



EFRAG

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Below please find general comments on **Draft EFRAG IG 1: [Materiality assessment implementation guidance](#)**.

1. Include a table indicating the disclosures to be presented for the sustainability topics identified as material. This would enhance consistency among different entities, while contributing towards reaching the objective of having the necessary disclosures.
2. More guidance as to how an entity identify and evaluate the relevant disclosures, both for the entity itself and also with respect to the industry they operate in. There is a need for more sector specific disclosure guidance and guidance on what the companies are expected to consider.
3. Definitions and the extent of the stakeholders – how far reaching or what type of stakeholders shall an entity be looking at keeping in mind that each industry has different stakeholders. High-level guidance with the relevant criteria for both financial and non-financial topics is necessary.
4. There is a need for more guidance as to how:
 - an entity assigns weight to the different stakeholder groups and how an entity can justify removing a topic if there is only a minority that thinks that this item is material.
 - the result is to be validated.
 - the entity's operational value chain is identified when doing the materiality assessment.
5. The guidance could explain the link between the CSDDD and the materiality assessment. How is the CSDDD going to impact the materiality assessment of entities?
6. Given that there are no thresholds, what other criteria is expected to be applied when assessing the double materiality concept?

Kind Regards,

Malta Institute of Accountants (MIA)