**Eni - Comments related to Double Materiality Implementation guidance**

**2.4 Scope of application of the materiality of information**

We believe that it would be useful to receive further guidance, including through examples, with reference to the definition of the materiality of the various datapoints; in fact, in the standards and in the guideline, there is a paragraph that clarifies that individual datapoints are not necessarily material even though the topic is material, but without making explicit criteria for making this judgment, nor examples.

We think this is an extremely relevant point since the preparation of the sustainability statement should not be an exercise of mere compliance but, rather an opportunity to elaborate useful information for the reader on impacts risks, opportunities and in this regard, it should not be watered down by ineffective disclosures. On the other hand, in the absence of uniform criteria for all companies, in our opinion there is the risk that the principle of comparability and adequate representation of information would not be met. To give an example for our industry, water and related consumption is certainly a material topic but the single indicator related to water intensity we do not believe is very relevant since the indicator is constructed using net revenues as the denominator. In our industry we operate with high volatility in commodity prices. Even though such information would be easily available for publication it would not be useful for the user. On this aspect, we believe that further discussion in the guideline considering such cases is necessary.

**3.7 Deep dive on financial materiality: Setting thresholds – Par. 124.**

It could be useful to provide some examples on the financial effects associated with dependencies on natural and social resources that do not meet (or do not yet meet) the criteria for accounting recognition and also on the process of setting adequate thresholds.

**FAQ 8: May the undertaking consider only the sustainability matters in ESRS 1 AR 16?** Considering EFRAG's current work in developing the new sector standards we would have liked to have more clarity in the guideline in terms of the materiality process to be followed until the sector standards would be finalized or at least a reference to the methodology that will be presented in the sector standards We would expect that with the emission of sector standards some topic would be considered material by definition.

**FAQ 22: Is a multi-sector group required to include metrics for the entire group or only data related to the material IRO? – par. 210.**

*“Once metrics have been assessed for materiality and determined to be material, the data for the entire group shall be included in the metrics”.* This sentence should be accompanied by another one specifying, that when the topic is material for only part of the group, there should be no disclosure of any related metrics for the whole group. Moreover, Paragraph 103 of ESRS 1 states:

*Where the undertaking identifies significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries, the undertaking shall provide an adequate description of the impacts, risks and opportunities, as appropriate, of the subsidiary or subsidiaries concerned.*