

EFRAG's (draft) IG 2: Value chain implementation guidance (VCIG)

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What type of stakeholder are you?

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Additional comments:

Major comments:

- Regarding the FAQ process, we strongly recommend carefully considering which guidance to add; every new guidance, while not legally mandatory, can render interoperability with the ISSB more difficult. At least any guidance repeating the CSRD or ESRS legislative texts should be removed, and any add-on guidance should systematically be challenged against potential challenges for preparers when disclosing under both CSRD and ISSB in a single report.
- The document contains many redundancies, and several passages simply repeat the wording of the ESRS, which does not add any additional information or value (example MAIG, p. 5 (4.)) – precise and concise wording is key, to avoid guidance and regulation becoming even more extensive and complex, as already is (see high # of FAQs). Please refer to concrete proposals on how to streamline below.

Minor comments:

- The use of indefinite (legal) terms further increases the risk of additional reporting burden and complexity (see the example brought forward for the MAIG).
- General references to soft law, such as the OECD guidelines, further increase legal uncertainty due to their ambiguous and expansive requirements. General references are already included in the ESRS, therefore there is no value in adding further such general references; at most, it could be helpful for preparers to refer to very specific aspects of soft law that may be considered. Any such purely general references should be deleted.