

Paris, 21 May 2024

Subject: Mouvement Impact France welcomes the VSME ESRS exposure draft.

Dear Sir or Madam,

[Mouvement Impact France](#) is an employers organization representing more than 15, 000 French entrepreneurs committed to the ecological and social transition. Mouvement Impact France creates standards and a tool ([Impact Score](#)) for businesses to measure corporate impact on environment and society. This tool has been used by over 5,000 companies and is used by some local authorities to condition the granting of public subsidies.

Mouvement Impact France welcomes the adoption by EFRAG of the VSME ESRS exposure draft: we appreciate efforts to establish a EU-wide framework for sustainability reporting for SMEs and believe this is a major step forward for them to improve ESG transparency and performance.

However, we recommend incorporating an additional indicator enabling businesses to report on their legal forms, particularly in countries where stakeholder governance models are available (in France, société à mission, société commerciale de l'ESS, agrément ESUS, etc).

We also consider that data collected in other tools e.g Impact Score, B Lab Impact Assessment and other reporting frameworks (like GRI) should also be accepted for non-listed SME business partners in the value chain.

We also regret that the VSME ESRS focuses a lot on corporate social responsibility but does not take into account that much indicators related to the adoption by businesses of concrete impact strategies: we thus believe VSME ESRS could integrate some indicators developed in the Impact Score, such as the share of corporate turnover invested in a mission of ecological and/or social benefits or the share of businesses' sustainable purchases.

Finally, we strongly believe that to make the best possible decisions, you need to have the best information at your disposal: it is thus essential to encourage SMEs to report on their ESG performance. In this respect, we propose to work on the creation of a tool enabling businesses to make visible and easy-to-access for consumers and investors their ESG performance on the basis of ESRS reporting data: we are convinced this would help to make reporting an opportunity more than a burden for businesses.

Thank you for considering our feedback. We look forward to the continued development of the VSME ESRS and remain at the disposal of the experts to work on the great and efficient implementation of the VSME ESRS.

Yours sincerely,

Malo Bourel-Weeger
Head of European Affairs