



Belief

Belief Group AS main points:

We believe that questions and demands from enterprises subject to CSRD will quickly arise for those not subject to CSRD, and that a voluntary reporting standard could be a suitable tool for all those not subject to CSRD to respond when asked about sustainability.

For it to function as intended, we believe there must be a clear and evident connection between mandatory and voluntary standards. The terms should be identical for similar matters. The designation and numbering of the points to be reported should be identical. In the current proposal, this is not the case. See the comparison of ESRS Set 1 and VSEM Basic module in the table below.

To prevent the voluntary standard from becoming too extensive, there could be "jumps" in the numbering from the ESRS, which should be resolved by listing all points not applicable in the correct order but indicating "Not applicable for VSME". This way, there will be a clear connection between mandatory and voluntary standards.

We believe the division between PAT and BP modules will confuse both users and preparers and suggest that there are only two levels: 1 basic (or entry level) for micro-enterprises, and then a level 2 that all companies that are not micro must fill out in addition to the entry level.

Double materiality is a fundamental principle that is easy to understand and should guarantee that all enterprises work with what is material. Therefore, we believe that everyone who reports must start with a double materiality analysis, including micro-enterprises.

Attestation will entail an additional cost for enterprises, which will be challenging for many. We therefore support that there should not be a requirement for attestation but that it is done by self-declaration.

SRS Nr	ESRS	VSME Nr	VSME
BASIC MODULE			
ESRS 1	General requirements	B1	Basis for preparation
ESRS 2	General disclosures	B2	Practices for transitioning..
E1	Climate change	B3	Energy and Greenhouse Gas Emissions
E2	Pollution	B4	Pollution of air, water, soil
E3	Water & marine resources	B5	Biodiversity
E4	Biodiversity & ecosystem	B6	Water
E5	Resource use and circular economy	B7	Resource use, circular economy, and waste management
S1	Own workforce	B8	Workforce – general characteristics
S2	Workers in the value chain	B9	Workforce – health and safety
S3	Affected communities	B10	Workforce – remuneration, collective bargaining, and training
S4	Consumers and end-users	B11	Workers in the value chain, affected communities, consumers, and end-users
G1	Business conduct	B12	Convictions and fines for corruption and bribery

We would like to see an evaluation of a possible requirement for those companies reporting under CSRD where they are not allowed to request more information from SMEs if the SMEs have reported under VSME.