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 EFRAG

PUBLIC CONSULTATION SURVEY

DRAFT AMENDED ESRS

 JULY 2025



Amended ESRS - Exposure Draft 2025 Public Consultation Survey

This document contains the public consultation survey questions. Please note, that the survey itself is provided with an online tool, which should be used to respond to it:

<https://survey.alchemer.eu/s3/90874765/Amended-ESRS-Exposure-Draft-July-2025-Public-Consultation-Survey>

All documents and materials are available on the EFRAG webpage:
<https://www.efrag.org/en/amended-esrs>

INTRODUCTION

Welcome to the EFRAG Survey on the Amended ESRS Exposure Drafts 2025! Please submit your answers by 29th September 2025 by clicking on the 'Submit' button at the bottom of the survey.

Please note that you can save the draft survey, and go back to it at a later time, by clicking on the 'Save and continue later' button in the top right corner of the page. EFRAG will only take into consideration surveys where the 'Submit' button has been used.

For any technical queries regarding the survey, please contact efragsecretariat@efrag.org

INTRODUCTION TO ESRS SIMPLIFICATION:

Building on CSRD 'Wave 1' feedback and based on the mandate from the European Commission, EFRAG is proposing a simplified set of European Sustainability Reporting Standards (ESRS), reducing datapoints by 57% while retaining the core objectives of the EU Green Deal.

IN A NUTSHELL: WHY AND HOW IS EFRAG SIMPLIFYING ESRS REPORTING

1. Combining two policy priorities: reducing the administrative burden and ensuring quality sustainability reporting

In the European Green Deal, the EU set out its ambition to become a decarbonised economy by 2050 and foster sustainable development for European businesses. To support this ambition, several pieces of legislation were adopted, including the Corporate Sustainability Reporting Directive (CSRD) and the related ESRS. Large public interest entities with more than 500 employees, which include publicly listed companies in the EU, were the first to report in line with the CSRD and ESRS for the reporting year 2024. Initial feedback from these companies and from those that will be subject to the CSRD and ESRS in the future, centred around the fact that the information required by the ESRS was too detailed and the reporting processes too complex.

To increase European competitiveness and reduce the administrative burden placed on companies, the European Commission (EC) decided to review European reporting legislation. This initiative, launched on February 26 2025, is also known as the 'Omnibus'. The EC tasked EFRAG, who drafted the initial ESRS, to significantly simplify the ESRS without compromising the objectives of the Green Deal and the much needed quality of reported data.

2. Gathering evidence: capitalising on a wealth of knowledge and experience

During the second quarter of 2025, EFRAG collected feedback to structure its simplification efforts. A survey gathered over 800 responses, many stakeholder events were organised, and interviews were held with a variety of companies, investors, and other stakeholders. The aim was to learn from their experience of implementing the ESRS or using the ESRS as input for decisions. The focus of EFRAG has not only been on datapoint reduction, but on a reduction in efforts required to comply with the CSRD and ESRS.

3. Elaborating simplified standards: levers of simplification and review of datapoints

EFRAG systematically used six 'top-down' levers of simplification to address sources of complexity:

1. Simplification of the Double Materiality Assessment (DMA) – the DMA is the process to prioritise sustainability topics for reporting: the amendments simplify the DMA process and documentation for audit purposes.
2. Better readability and conciseness of the sustainability statements: improved flexibility on how to organise the information, more emphasis on how the company manages its sustainability issues.

3. Elimination of the overlaps between general disclosures and topical standards: deleting most granular narrative requirements in topical standards.
4. Improved understandability, clarity and accessibility of the ESRS standards: voluntary disclosures eliminated, clarified language, various concepts are simplified, text is shortened.
5. Introduction of several burden-reduction reliefs: new flexibilities and reliefs have been included. For example, information does not have to be reported if it requires undue cost or efforts.
6. Enhanced interoperability with global reporting standards: various changes have been implemented to further enhance interoperability with other standards, in particular the IFRS Sustainability Disclosure Standards.

In parallel, EFRAG performed a critical ‘bottom-up’ review of all datapoints to prioritise direct relevance and usefulness in decision-making, with a focus on core data. This work results in a reduction of 57% in ‘mandatory’ datapoints (which are all to be reported only if material). In addition, all ‘voluntary’ datapoints are eliminated. Counting both mandatory and voluntary datapoints, the total number is reduced by 68%. The length of the ESRS is reduced by over 55%.

The simplification will contribute to a significant overall reduction in reporting efforts.

4. Consulting stakeholders on draft simplified standards

As a next step, EFRAG is launching a public consultation today on the draft simplified Standards (exposure drafts) and welcomes your input. The consultation will run until the 29 September, and EFRAG will deliver its technical advice to the EC by the end of November.

INTRODUCTION TO THE QUESTIONNAIRE:

Context

This questionnaire gathers feedback on the 12 Amended ESRS Exposure Drafts ('Amended ESRS' or 'EDs' or 'the Amendments'). In accordance with EFRAG's Due Process Procedures, the purpose of this consultation is to gather feedback and comments from a variety of stakeholders. EFRAG is interested in getting feedback on whether the Amendments proposed in the ED achieve the desired outcomes in terms of simplification and whether EFRAG has appropriately reflected in the Amendments the suggestions collected in the public call for input and outreach program run in April and May 2025.

EFRAG is performing the simplification exercise following a specific mandate from the European Commission (EC) described in the Explanatory Memorandum ('EM') that accompanies the Omnibus proposal. The Amendments assume that the CSRD will be modified according to the Omnibus Proposal issued by the European Commission ('EC') in February 2025. Comments that go beyond the EFRAG simplification mandate, such as questioning the content of the CSRD or asking to modify the ESRS in a way that is not compatible with the simplification mandate, will not be considered.

The EDs are accompanied by a Basis for Conclusions which illustrate the reasoning of the EFRAG Sustainability Reporting Board ('SRB') and EFRAG Sustainability Reporting TEG ('SR TEG') in preparing the Amendments. The rationale for change at paragraph level in the 12 Standards can be found in the 'Log of Amendments per Standard' annex of the Basis for Conclusions ('BfC').

All the Exposure Draft documents and materials are accessible at this link <https://www.efrag.org/en/amended-esrs>

Call for interest in participating to the cost benefit analysis on the simplification exercise

In parallel with the public consultation on the ESRS simplification, EFRAG has launched a cost-benefit analysis ('CBA') conducted by external consultants.

Amended ESRS Exposure Drafts – July 2025 Public Consultation Survey

The purpose of this CBA is to assess the potential costs and benefits of the proposed simplifications to the ESRS.

For the analytical purpose of this CBA, in the coming weeks EFRAG will share the external consultants' CBA survey link. We kindly invite you to respond to the CBA survey as your input will be essential for the analysis.

Questionnaire instructions

This invitation to comment includes 30 questions (General feedback), in addition to those necessary to capture the profile of the respondent, and allows the respondent also to provide more detailed comments at level of Disclosure Requirement ('DR') or paragraph of the ED. It is structured in 3 parts:

Part 1. Profile of the respondent (always required)

Part 2. General feedback (respondents can choose the questions to which they reply)

Part 3. Detailed feedback at level of DR or paragraph of the ED (optional).

Each part includes multiple questions. Except for part 1, you can select which questions you want to answer and skip the other questions in each part. Part 3 intends to collect granular feedback and it is optional. You are invited to respond to Part 3 when you intend to comment on the simplifications implemented in a Disclosure Requirement (DR) or even paragraph of the Standards.

Respondents are kindly invited to avoid repeating the same comments in two or more parts/questions.

Each question asks if you AGREE / PARTIALLY AGREE AND PARTIALLY DISAGREE / DISAGREE with the proposals in the ED. In all cases, you are invited in your comments to explain why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any. The length each comment is of 300 words.

Please note that EFRAG only considers the surveys for which the submission procedure is completed and successful. You will receive an email confirming receipt of your response on the submission. We recommend you to check your spam folder when looking for the confirmation email.

EFRAG assumes that you give consent to publish your responses. Please select NO here if you do not want that your responses are made public.

☐ Yes

☐ No

PART 1: Information about the respondent: Q1 – Q10

1) Please enter the following information:*

Name: _____

Surname: _____

Name of organisation: _____

2) Please enter your email*

3) Which of the following stakeholder types do you represent?*

Company (Preparers)

☐ Preparer (non-financial institution preparing a sustainability report)

☐ Business association (other than association of financial institution)

Users

☐ User (analyst, data provider, rating agency, etc.)

☐ National supervisory authority & regulator

☐ User Association

Financial Institutions

☐ Bank

☐ Asset manager/Investor

☐ Insurance

☒ Association of financial institutions

Other stakeholders

☐ Consultant (including software vendor)

☐ Other - please specify (required): _____ *

☐ Auditor

☐ (National) standard setter

☐ NGO

☐ Academia

4) Preparers: Please disclose your company's revenue in EUR below (at group level, if applicable)*

Revenue: _____

5) Preparers: Please disclose your company's total assets in EUR below (at group level, if applicable)*

Total assets: _____

6) Preparers: Please select your company size by employees (at group level, if applicable)*

- ☐ Less than 1000 employees
- ☐ More than 1000 employees and less than 3000
- ☐ More than 3000 employees and less than 5000
- ☐ More than 5000 employees

7) Country of headquarters*

8) Preparers: Is your company in scope for the preparation of ESRS sustainability statements under the CSRD (adopted in 2022)? [Companies in scope: over 250 employees, €50 million in net turnover, or €25 million in total assets]*

- ☐ Yes – but the CSRD has not been transposed in the jurisdiction
- ☐ Yes - from 2024 and the relevant jurisdiction has transposed the CSRD
- ☐ Yes - from 2025 and the relevant jurisdiction has transposed the CSRD
- ☐ Yes - from 2026 and the relevant jurisdiction has transposed the CSRD
- ☐ No
- ☐ No, but it is done/intended to do on voluntary basis

9) Preparers: Did your company prepare a sustainability statement for Financial Year 2024?*

- ☐ Yes, based on the ESRS Delegated Act published in 2023
- ☐ Yes, based on another sustainability standards or (national) legislation
- ☐ No

10) Preparers: Does your company also prepare or intend to prepare a sustainability statement under IFRS S1/S2?*

- ☐ Yes
 - ☐ No
-

PART 2: GENERAL FEEDBACK: (Q10 – Q31)

This part asks questions about:

- (1) the main simplifications implemented,
- (2) specific requirements for which EFRAG SRB members expressed reservations and remaining concerns, in the approval of the Exposure Drafts (EDs),
- (3) overall feedback at standard level and
- (4) any other comments.

The main simplifications implemented are grouped into “Levers” of simplification, as described in the Basis for Conclusions (BfC).

11) Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reporting

Rationale for the changes

The Amendments have clarified **the requirements in ESRS 1 Chapter 3 about** materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4).

Link here to access the [Log of Amendments](#), ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale.

The [Explanatory Memorandum \(EM\)](#) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: *“[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process.”*

Description of the changes

To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA):

1. A new part presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1)
2. More prominence has been given to materiality of information as a general filter and all the requirements are subject to it.
3. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22)
4. It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information
5. Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2)
6. To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed
7. The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status.
8. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, to avoid long lists of sites being included in the sustainability statement.

Please do not comment here in “Gross versus Net” as it is covered by the next question.

Question

If you intend to provide feedback also on Part 3 of this questionnaire (at the level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here.

Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?

☐ YES

☒ PARTIALLY AGREE/PARTIALLY

DISAGREE ☐ NO

[COMMENTS – max 300 words]

Clarification on IRO and topics is considered helpful (ESRS 1, paragraphs 2 and 22)

The simplified DMA approach, particularly for complex value chains, risks reducing the scope of reported information. We welcome (1) additional guidance to safeguard the robustness of assessments and (2) more substantial reporting on an assessment process, including more detailed information on the assessment related to UNGPs and OECD Guidelines, which we find highly useful, and materiality thresholds that they have implemented.

The choice between a top-down or bottom-up DMA approach provides valuable flexibility for different undertakings' circumstances. We recommend making the topic list in Appendix A illustrative rather than mandatory.

The top-down approach too requires thorough documenting, also on how companies aim to avoid blind spots, covered by the text "unless an assessment at the individual level of IROs is needed to conclude on their materiality". We recommend that companies conduct a quick-scan of the initially non-material topics to ensure they do not miss blind spots.

The option to disclose on the IRO level (compared to topical level) might result in a lower level of inter-company comparability. We recommend there be more guidance on the practical differences between these approaches, with examples to help preparers make appropriate choices.

We encourage that undertakings shall disclose what triggered changes in the results of the materiality assessment from previous periods.

The amendments on value chain integration would benefit from stronger integration of due diligence with value chain reporting. When negative material impacts are recognised during due diligence, engagement actions should be required. Undertaking should disclose the rationale for value-chain boundaries, coverage of value-chain information per material topic, and brief data-quality grading for key metrics. Where PAT do not extend into the value chain for material IROs, undertakings explain constraints and leverage mechanisms with time-bound extension plans.

12) New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impacts

Rationale for the changes

To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the Double Materiality Assessment (DMA) (the so called "gross versus net" issue). The EFRAG Sustainability Reporting Board (SRB) has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.

Description of the changes

Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when

the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.

Key discussion points at EFRAG SRB level

Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, **a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.**

Question

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by **answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here.**

Do you agree that the **new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?**

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS does not agree with EFRAG's proposal on the new guidelines for a hybrid approach and urges EFRAG to adopt one consistent approach to reporting actual and potential impacts.

The majority of DUFAS members prefers a gross approach enabling transparency around inherent risks to

- promote assessment and reporting before remediation, providing insight into the effectiveness of remediation and the actual reduction of adverse impacts. This transparency is essential in avoiding bias in final outcome, which a net approach may cause by understating risk exposure.
- improve comparability among firms, helping distinguish between those with no impacts and those that actively mitigated them.
- enhance year-on-year comparability of reporting in ESG performance, underscoring the need to differentiate between firms with no impacts and those that have mitigated them after facing challenges.

On the other hand, members preferring a net approach indicate that it better reflects the actual situation. Also, the auditor's conclusion on the sustainability statement implicitly covers a net approach. And a more extensive sustainability statement based on gross might be at odds with the simplification objective. However, a net approach would still need transparency on the outcomes of mitigation or prevention measures implemented before the impact occurred, especially when due to mitigating measures a topic is assessed as immaterial for reporting purposes.

Additionally, the term "supportable evidence" in ESRS 1 (paragraph 35) could create ambiguity due to its vague definition and its reliance on accountants' interpretation during DMA and annual reports. Clarifying whether reported impacts stem from previous periods – even if remediated – would greatly benefit investors. For instance, if a company reports 12 health and safety impacts, it's unclear whether these are new or unresolved from earlier reports.

Finally, we recommend removing Appendix C and clearly defining the "gross" approach to ensure consistency and comparability across undertakings.

Call for interest in participating to the field test

To address this complexity of this issue, EFRAG will run a targeted field test and is interested in involving a

diversified sample of companies. It will entail participating in dedicated working sessions with EFRAG Secretariat. The company is expected to present how the new guidance will affect the outcome and process of the DMA in each case, after having simulated the application of the revised requirements. A questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8th and 26th September 2025.

To confirm your interest in participating to the field test on 'Gross versus Net' field test, please send an email to this address: grossnetfieldtest@efrag.org by August 18, 2025.

13) Improved readability, conciseness and connectivity of ESRS Sustainability Statements

Rationale for the changes

Starting **with the input gathered from the first-time adopters**, EFRAG has introduced several changes to **support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole**. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) Chapter 4).

Description of the changes

EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information, **discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8)**.

Question

Do you agree that **these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?**

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS is in favour of the reduction of duplications (clarifications on connected information).

DUFAS agrees with the proposed amendments. As users of sustainability information, we recognize that it is unnecessary for companies to duplicate content various times in the annual report. Especially, as the basis for conclusions mentions, in the area of policies-actions and targets.

The use of appendices for detailed metrics also provides more overview for users.

Lastly, we note that the optional inclusion of an executive summary at the beginning of the statement may serve the interest of some users. We ask EFRAG to clearly specify the safeguards (following from the ESRS principles for quality of information and/or from the Accounting Directive) that govern the quality of an executive summary whether as part of the sustainability statement or of the management report.

14) Restructuring of the architecture and interaction between ESRS 2 and Topical Standards

Rationale for the changes

The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical Standards. They have also introduced a more principles-based and less prescriptive approach to the requirements in policies, actions and targets (PAT). These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4).

The [Explanatory Memorandum \(EM\)](#) (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards.

Description of the changes

To achieve this objective, EFRAG has implemented the **following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information:**

1. Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose.
2. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application.
3. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical Standards (e.g. resilience in ESRS E1).
4. The requirement to disclose PAT for material IROs, if adopted, is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained.
5. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed.

Question

Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?

() YES

(X) PARTIALLY AGREE/PARTIALLY

DISAGREE () NO

[COMMENTS – max 300 words]

DUFAS does not support elimination of the requirement to disclose whether the undertaking plans to implement a PAT for material topics, and neither that the timeline has been eliminated. Transparency requires explanation when PAT are absent, particularly for material negative impacts and risks. Elimination might lead to weaker accountability and comparability for investors. It could allow companies to simply state 'no PAT' at topic level without explaining where gaps remain and how they intend to close the gaps.

We argue that an "explain if not" approach would better serve stakeholders: undertakings should disclose why PAT have not been developed for material risks and negative impacts, distinguishing these from opportunities where PAT may be less critical. This maintains accountability without excessive prescription, ensuring that the absence of PAT represents a deliberate strategic choice rather than oversight. Transparency about risk management decisions is essential for stakeholder confidence and comparability between undertakings

DUFAS expresses concern relating to the reformulation of certain mandatory datapoints into Application Requirements (ARs). The legal status/requirements of application requirements might send mixed signals to companies, as companies might not understand that it relates to mandatory methodological guidance. This could weaken enforceability and comparability.

Lastly, it is important that companies report information that is most material to them. We believe that the restructuring of the architecture establishes more concise reports and prevents unnecessary duplication of information.

15) Improved understandability, clarity and accessibility of the Standards

Rationale for the changes

The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which had a status problematic to

understand. These Amendments are described as **Lever 4** in the Basis for Conclusions (BfC) (Chapter 4). The [Explanatory Memorandum](#) (EM) (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards.

Description of the changes

To achieve this objective, EFRAG has implemented the **following changes**:

1. “May disclose” datapoints have been all eliminated.
2. All the “shall disclose” datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are **relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering ‘how to disclose’ guidelines**.
3. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS.

Question

Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance (‘NMIG’).

If you intend also to provide feedback on **Part 3**, when providing your comments, please refrain from **duplicating the comments that you will provide at Standard or DR level**.

Do you agree **that these proposed amendments achieve the desired level of clarity and accessibility?**

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS agrees that the Amendments materially improve clarity and accessibility. Eliminating “may disclose,” relocating mandatory application guidance directly under each Disclosure Requirement (DR), and streamlining language deliver on Lever 4’s aim of improved understandability, clarity, and accessibility.

We broadly agree that the proposed amendments to ESRS 1 improve clarity and accessibility. The restructuring of disclosure requirements (DRs) and application requirements (ARs) into clearly delineated sections enhances usability. The removal of “sub-subtopics” and the consistent use of “topics” and “sub-topics” simplifies navigation and interpretation. The clearer articulation of double materiality—particularly the distinction between impact and financial materiality—supports more consistent application across sectors.

To make these improvements unmistakable in practice—and auditable—we recommend two targeted enhancements:

1. Stamp the assurance scope on AR. Open ESRS 1 with a single explicit sentence that Application Requirements attached to a DR are mandatory and within assurance scope. In the standards text, prefix every AR block with “Mandatory application requirements” (not just “AR”). This removes residual ambiguity created by moving content out of appendices and ensures preparers, assurers, and users interpret AR consistently.
2. Introduce stable IDs for every mandatory datapoint and AR. Assign durable identifiers (e.g., E1-6.M1 for a datapoint and E1-6.AR1 for its application requirement) and require their use in cross-references and digital tagging. Stable IDs will make the standards easier to navigate, reduce mis-tagging risk, and facilitate high-quality digital reporting and tool support.

With these adjustments, the separation between mandatory and non-mandatory content will be clear at a glance, consistently interpreted across entities and assurers, and straightforward to implement in systems and tags. We therefore agree with the proposal, subject to the enhancements above, which are fully aligned with the intent of Lever 4 to remove “may” provisions, streamline drafting, and clarify the structure between mandatory and non-mandatory content.

16) Usefulness and status of “Non-Mandatory Illustrative Guidance” (NMIG)

As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been

moved to “Non-Mandatory Illustrative Guidance” (**‘NMIG’**). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that:

- a) was in the Delegated Act
- b) is now deleted; and
- c) contributes to the overall datapoints reduction.

It contains ‘how to report’ guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act.

You are invited to provide your comments on the purpose of NMIG, if any.

You can access the NMIG at this [link](#).

Select the NMIG from this dropdown menu of NMIG **guidelines**:

Insert dropdown list of 12 NMIG’s and an option to pick ‘All’
[COMMENTS – max 300 words]

[Select: All]

We acknowledge that the non-mandatory illustrative Guidance could provide useful support for companies by clarifying how to report and providing practical examples. This can enhance consistency and ultimately improve the decision-usefulness of information investors depend on.

However, the current legal status of NMIGs seems to remain uncertain, and this creates ambiguity. We want to emphasize the importance of legal certainty. We agree with EFRAG's recommendation that the European Commission should not include NMIG content within the Delegated Act. Including this material in legally binding regulation would risk creating ambiguity about its status and potentially trigger additional compliance efforts, undermining the simplification objectives.

However, if the European Commission decides to include NMIG content in the Delegated Act, it should be structured as an annex with clear introductory language stating that the content provides guidance and examples only. The annex introduction should explicitly clarify that undertakings are not required to justify non-compliance with these illustrative elements, distinguishing them clearly from mandatory disclosure requirements. We request clarification on the intended final use of this guidance, its legal status, and a clear statement that these are non-mandatory standards.

Additionally, we highly recommend combining all guidance. Throughout 2024, various forms of guidance (e.g., Q&As, Implementation Guidance) have been issued to support firms in preparing their sustainability reports. Our preference is to combine all forms of guidance (‘combined guidance’) to make it easier for reporting companies to seek support in their implementation, referring them to a single document rather than multiple documents.

17) Burden reliefs and other suggested clarifications

Rationale for the changes

The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4).

The [Explanatory Memorandum](#) did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB’s IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless **included the following objective (page 5): [the simplification]**

will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation.

Description of the changes

EFRAG has implemented the following changes:

1. The relief “undue cost or effort” has been introduced, including for the calculation of metrics.
2. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods.
3. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91).
4. Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60).
5. Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21).
6. When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)).
7. A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1, Chapter 5.4) allowing the undertaking to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period.
8. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions.

Following the EC representatives’ recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.

Following the EC representatives’ recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.

Question

EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard.

Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them.

Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders’ demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB’s IFRS S1 and S2?

☐ YES

☒ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS acknowledges that the introduction of a horizontal undue cost or effort relief seems pragmatic, but there is a risk companies will invoke this widely, especially in value-chain metrics. From an investor standpoint, broad or repeated use could fragment datasets and erode cross-issuer comparability. Any relief should be bounded by clear safeguards. For instance, disclosure why the relief applies; disclosure of scope left out and material gaps. Without such safeguards,

decision-usefulness and portfolio-level aggregation might suffer.

DUFAS notes that flexibility to use estimates could be helpful for preparers, but investors need estimates that are assurable, transparent and comparable. We would like to emphasize the importance of stringent criteria regarding estimation methodology and transparent reporting on the estimation methodology, uncertainty ranges/sensitivities, data coverage percentages, plans to improve data availability /quality over time. This will help preserve decision-usefulness and comparability for investors.

Regarding the balance between burden relief, preserving transparency and interoperability with the ISSB's IFRS S1 and S2: We support maximum interoperability between ESRS and IFRS S1/S2 without diluting double materiality. Our clients need both the financial lens (IFRS S1/S2) and the ESRS impact lens. Key points:

- * ESRS E1 must remain broader than IFRS S2 (impact + risk, including target alignment, transition capex, etc)
- * Alignment should not dilute ESRS ambition
- * The real value for investors is linking sustainability impacts to the financial statements, not just aligning ESRS and S2 wording

18) Relief for lack of data quality on metrics (ESRS 1 paragraph 92)

Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here.

Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?

☐ YES

☒ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS supports that investee companies strike a balance between identifying and uncovering available information without undue cost or effort to conduct their assessments and report on their metrics. We emphasize the importance that companies use this as a learning curve, having to continuously improve over time.

Our concern is that repeated use of narrow scopes could weaken trend and peer comparability and complicate assurance. To preserve reliability, any reliance on reliefs should be accompanied by clear guardrails, e.g. explicit rationale for invoking the relief and the decision criteria applied, scope transparency, time-bound improvement plans, method transparency.

As the Basis for Conclusion mentions, the objective is to align with the IFRS S1 reliefs, which enhances interoperability.

19) Relief for anticipated financial effects

Rationale for the changes

Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial

effects is particularly challenging. **This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 4 Lever 5). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.**

Description of the changes

The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11):

- a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS.
- b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2.

Some of the EFRAG SRB members noted that **Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.**

Question

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here.

Please select **from the alternatives below the one that represents your view:**

☒ I agree with Option1

☐ I agree with Option 2

☐ I disagree with both Options

[IN ALL CASES, PROVIDE THE RATIONALE FOR YOUR PREFERENCE AND SUGGESTIONS FOR IMPROVEMENTS IF ANY]

[COMMENTS – max 300 words]

DUFAS strongly prefers option 1, as it is most aligned with the IFRS relief, and large undertakings in scope of the CSRD are familiar with this type of reporting. As EFRAG notes, the likelihood that the undertakings do not have skills, capabilities or resources is highly limited. For institutional investors, information on anticipated financial effects is highly useful as we aim to realise long term value creation. As it presents a "comply or explain" mechanism, it challenges undertakings to be transparent about their progress and priorities. It pushes the field forward by encouraging the development of more mature reporting practices, rather than allowing a default to less informative qualitative disclosures. For sustainability reporting to be truly meaningful, it must connect impacts and risks to financial figures.

However, we stress the importance of the applicable conditions and safeguards (on the use of the relief) to be further specified. We believe that the availability of climate risk metrics is important. For that reason, the effects of both options should be assessed as preparers often raise undue costs and burden as a reason for not providing this information. It would be valuable to assess and specify the conditions under which it can be invoked by a preparer and whether it could negatively impact on the wide availability of climate risk metrics.

In terms of conditions and safeguards, we suggest:

1. Phase-in requirement for companies to comply with qualitative information in the first three years of reporting, with quantitative information to be reported afterwards.
2. Companies should provide a clear rationale for invoking any relief, specify the methodology and uncertainty assumptions applied, and outline concrete improvement plans — comparable to the 'best-effort' obligation under SFDR.

20) ESRS E1: Disclosures on Anticipated Financial Effects

The content of the disclosure requirements on anticipated financial effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3 to avoid duplication of input. Your comments on those provisions can only be provided here.

Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 **strike an acceptable balance between (i) simplification and reporting effort and (ii) users' needs?**

☐ YES

☒ PARTIALLY AGREE/PARTIALLY

DISAGREE ☐ NO

IF YOU REPLIED NO, SELECT THE PARAGRAPH ON WHICH YOU WANT TO EXPRESS AGREEMENT / DISAGREEMENT [SCROLLING MENU]:

☐ ESRS E1 - 40. (a)

☐ ESRS E1 - 40. (b)

☐ ESRS E1 - 40. (c)

☐ ESRS E1 - 40. (d)

☐ ESRS E1 - 41. (a)

☐ ESRS E1 - 41. (b)

☐ ESRS E1 - 41. (c)

☐ ESRS E1 - 41. (d)

☐ ESRS E1 - 41. (e)

☐ ESRS E1 - 41. (f)

☐ ESRS E1 - 42.

[COMMENTS – max 300 words] – AVAILABLE IN ALL CASES

DUFAS welcomes the amendments that keep the criteria aligned with the primary data requested by banks, as this is also useful information for other financial institutions. As the log of amendments notes, the changes are also aligned with IFRS S2.

We recognize the practical challenges undertakings may face due to evolving methodologies and data availability. To ensure these disclosures are both feasible and effective, we strongly advocate for the consistent application of the "comply or explain" principle.

This approach would require undertakings to disclose the required quantitative information by default. If they are unable to do so, they must provide a clear and substantive explanation for the omission. This explanation is, in itself, a valuable piece of information, offering insight into a company's risk management maturity and data infrastructure.

Applying the "comply or explain" principle will increase adoption rates by providing necessary flexibility in the short term, while simultaneously fostering greater transparency. It maintains the ambition of achieving full quantitative

disclosure as methodologies mature, ensuring that the reporting framework remains both practical for preparers and decision-useful for stakeholders.

21) Enhanced interoperability with the ISSB's Standards IFRS S1 and S2

Rationale for the changes

EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's Standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Chapter 4, Lever 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability.

One of the [Explanatory Memorandum](#) (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting Standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.

Description of the changes

To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments.

1. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information.
2. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR 19), aligned with the financial control approach in the GHG Protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20).
3. The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20).
4. The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16).
5. Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1.
6. The reference to IFRS industry-based guidance and SASB Standards as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards).
7. The datapoint reduction resulted in the elimination of 7 "shall" datapoints described in Basis for Conclusions (BfC) (Chapter 4, Lever 6).
8. Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4, Lever 6).

Question

Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS welcomes the amendments, including the IFRS reliefs as well as the language that is more common between the two standards, that aim to increase interoperability with other international standards. We support retaining maximum interoperability between ESRS and IFRS S1/S2 without diluting double materiality. Clients need both the financial lens (IFRS S1/S2) and the ESRS impact lens.

Our key points:

1. ESRS E1 must remain broader than IFRS S2 (impact + risk, including target alignment, transition capex, etc)
2. Alignment should not dilute ESRS ambition
3. The real value for investors is linking sustainability impacts to the financial statements, not just aligning ESRS and S2 wording

Accordingly, it is important that any reliefs introduced in the exposure drafts should not negatively impact interoperability, particularly those reliefs that go beyond the ones described in the ISSB standards. This could be the case for the reliefs on climate-related disclosures in E1, as they may result in placing the ESRS standards below the global baseline. We suggest ensuring further alignment between the ESRS E1 climate standard and IFRS S2, to avoid unnecessary reporting burden on undertakings that have to disclose under CSRD and ISSB.

22) Reduction in the number of mandatory and voluntary datapoints

The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3.

The [Explanatory Memorandum](#) (page 6) specified that “the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking.”

To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction.

Do you agree that the proposed **reduction in “shall disclose” datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?**

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

☒ I BELIEVE SOME OF THE DELETED CONTENT SHOULD BE MAINTAINED (PLEASE SPECIFY IN THE COMMENTS BY INDICATING THE RELEVANT PARAGRAPH IN THE STANDARD)

[COMMENTS – max 300 words]

DUFAS acknowledges that the proposal ensures ESRSs are structured better and redundancy is reduced. This is a good outcome as it ensures the core of the ESRSs is maintained. The 57% reduction in “shall disclose” datapoints can support greater proportionality and usability for preparers, particularly during first-time application. However, whilst the number of datapoints has significantly decreased, this doesn’t necessarily translate to equal/equivalent reduction in burden.

We also refer to our response to Q29 regarding insufficient coverage of SFDR datapoints in the proposals.

23) Six datapoints exceptionally moved from “may” to “shall”

In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are, in EFRAG’s opinion, justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint

reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC), Appendix 3).

Datapoint	Rationale for moving from “may” to “shall”
ESRS E3 Water - Own operations total withdrawal (Amended ESRS E3 paragraph 28 (c))	This requirement should not create an additional burden, as reporting water consumption already relies on understanding the water balance, including both withdrawals and discharges. Given this, the change from optional ('may') to mandatory ('shall') reflects the importance of these metrics in completing the water balance equation and ensuring fair presentation of material IROs. Water withdrawal—defined as the volume of water removed from ecosystems—is a key indicator for assessing pressure on local water resources, particularly in water-stressed regions.
ESRS E3 Water – Own operations total discharges (Amended ESRS E3 paragraph 17)	This requirement should not impose an additional burden, as reporting water consumption already depends on understanding the water balance, including both withdrawals and discharges. Accordingly, the change from optional ('may') to mandatory ('shall') reflects the importance of these metrics in completing the water balance equation and supporting the fair presentation of material IROs. Water discharges, in particular, serve as a complementary indicator to water withdrawals, providing a fuller picture of pressure on water resources.
ESRS E4 Biodiversity and ecosystems- Disclosure of transition plan for biodiversity and ecosystems	Changed to mandatory as this disclosure is considered highly decision-useful for users in relation to undertakings operating in certain sectors. Disclosing information on a transition plan (TP) is conditional to have one that is publicly released. This does not add burden as the plan is already public and the information normally available. Implementing TPs, and disclosing on them, is an area that is normalizing and expected to become increasingly important in future years.
ESRS G1 Business conduct– Training of procurement team (Amended ESRS G1 paragraph 10 (c))	The revision G1 has consolidated previous scattered datapoints on training in one generic provision, while specifying the target audience considered critical in sustainability (such as the procurement team). This DP is an important information related to management of suppliers’ relationship for which several other DPs have been deleted.
ESRS G1 Business conduct confirmed incidents (Amended ESRS G1 paragraph 14) (1) Nature of incidents (2) Number of incidents	ESRS G1 did not include any mandatory metric on incidents of corruption and bribery, except for the SFDR indicators. This provision replaces narrative information about corruption and bribery with a quantitative metric. The definition of confirmed incidents is well provided in the Glossary. The required disclosure does not include names or persons involved nor other recognisable characteristics, so that it does not interfere with any legal process.

Do you agree that these exceptions to the general rule are appropriate and justified?

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS in general supports the proposal to exceptionally move these disclosures from “may” to “shall”, provided they remain subject to the double materiality assessment.

For E4 we do note that transition plans are already inherent to the general PAT disclosures under E4, if considered material. It feels redundant to have another disclosure on this, which aims to include information on targets, key actions, financial planning, governance of the plan. At the same time, the second part of the newly proposed disclosure on transition plans which requires a clear explanation of how the undertaking’s strategy and business model will evolve to become compatible with relevant global goals, such as halting and reversing global biodiversity loss in line with the GBF, is relevant.

24) Four new mandatory datapoints (exception)

In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified.

It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. **In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the**

achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6).

Datapoint	Rationale for new datapoints
ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement	This may be considered as a new datapoint but replaces several datapoints compared to the Delegated Act. The undertaking now must only state when certain principles were applied and when there is a divergent application from the general requirements, this means that it is not disclosed according to ESRS 1; examples are time horizons or changes in preparation or presentation of sustainability information.
E 2 - 4 Secondary microplastics resulting from the breakdown of larger plastic items or being unintentionally produced through the life cycle of the product.	The amount of secondary microplastics was already required to be reported in ESRS E2 through AR 20, which addressed both primary and secondary microplastics. However, the Q&A process and the outreach analysis highlighted a lack of clarity on the disclosure requirements in relation to primary and secondary microplastics. The
Clarification of former ESRS E2 paragraphs 28(b) and AR 20 leading to new added DP .	addition of a new qualitative datapoint on secondary microplastics, separate from the Set 1 microplastics datapoint, was favoured to improve clarity and simplify the understanding of the microplastics requirements. Secondary microplastics represent the main source of microplastics released into the environment.
E5-4 Percentage of total weight that are critical and strategic raw material Added draft ESRS E5 paragraph 15(c).	Added for better alignment with recent EU regulatory developments, particularly the Eco-design for Sustainable Product Regulation and Critical Raw Materials Act.
E5-5 Percentage and/or total weight for which the final destination is unknown. Added in draft ESRS E5 paragraph 18(e).	Added to allow mass balance of final destination of waste to be completely disclosed, not forcing undertakings to make unreasonable estimations but instead allowing them to disclose on the figures they have and can reasonably document.

Do you agree that these exceptions to the general rule are appropriate and justified?

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

[COMMENTS – max 300 words]

DUFAS welcomes the introduction of the new mandatory datapoints, as they are relevant to investors because they make explicit the elements that are critical for assessing a company's sustainability performance and risk exposure. From an investor standpoint, these datapoints will improve comparability, transparency and decision-usefulness without introducing undue burden, given particularly their direct link to existing disclosure objectives.

25) Emphasis on ESRS being a “fair presentation” reporting framework

The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practices. They think that the Amendments may result in increased legal risks and audit costs.

Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?

☐ YES

☒ PARTIALLY AGREE/PARTIALLY

DISAGREE ☐ NO

DUFAS welcomes the emphasis on ESRS as a fair-presentation framework, aligned with IFRS S1, and with materiality as a general filter. This could help reduce 'checklist-reporting' and improve decision-useful information for investors.

We suggest that further clarification is necessary on the framework to avoid divergent interpretations. We question whether fair presentation should solely on management judgement. To safeguard comparability and reliability, our members support some sort of safeguards. For example, for the accountant to monitor the fair presentation. Additionally, guidance is needed on how the fair presentation principle will be applied by assurance providers, as we have concerns that 'fair presentation' could be interpreted by auditors as 'true and fair view' of the annual accounts, which is a concept most commonly applied within the context of reasonable assurance engagement. Therefore, in line with paragraph 51 of the BfC, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers executes only a review of the process. Since EFRAG indicates that it is not their role to specify the auditor's role and mandate, we urge EFRAG to coordinate this issue with the European legislators.

Lastly, we have been consistently expressing support for the notion for reporting companies to submit their sustainability to a (binding or non-binding) vote at the AGM, to put sustainability reporting on a more equal footing with financial reporting and to increase the board's accountability regarding the sustainability performance of the company.

26) Exception for Financial Institutions' Absolute Climate Reduction Targets

One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.

☒ I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets (LINK TO TEXT BOX)

☐ I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets

Explain your reasoning and if you agree, elaborate on how financial institutions will give transparency and foresight to investors about their target setting and the evolution of their emissions [max 300 words].

DUFAS agrees with the proposal. We note that, if financial institutions have chosen an approach based on intensity targets, they should not be required to also have absolute targets (though they should report absolute emissions).

In this context, we do stress that CSRD reporting for asset managers should not relate to the client assets/investments.

27) ESRS S1: New Threshold for Reporting Metrics Disaggregated at Country Level

Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8). Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here.

Do you agree with the change to the **threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?**

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS does not agree with the removal of the threshold. While indeed the information is usually easily accessible and the additional burden is limited, removing the threshold of 10% causes situations in which detailed information for small offices in different countries still needs to be reported. The added value of the information is immaterial compared to the disclosures that already need to be made about the undertaking's employees, collective bargaining coverage, and social dialogue. Maintaining the 10% threshold helps report only about countries in which the undertaking has considerable employment relative to total employees.

28) ESRS S1: Calculation approach to adequate wages outside the European Union (EU)

The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability.

In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 b) i) to iii) to ensure transparency and comparability on this issue.

A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating in the field test on adequate wages, please send an email to fieldtestadeqwages@efrag.org by August 18, 2025.

Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages

in ESRS S1?

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS does not agree with the proposed change to the methodology. For investors to determine whether companies pay their employees an adequate wage, it is important to provide information on the methodology that is used. Without this, investors cannot judge the robustness of figures or compare across peers and time.

It is positive that key elements such as collective bargaining and the periodic revision of minimum wages in a country are explicitly included. However, we share the concerns flagged by the EFRAG SRB members. Our main concerns are:

It is insufficiently clear when a wage can be considered “adequate.” Now that there is an internationally recognized definition of a living wage by the ILO, it would be more logical to refer to this.

As currently phrased, it would be sufficient if employees’ wages meet the national minimum wage. The issue is that in many countries outside the EU, the minimum wage is far from adequate to meet basic needs, resulting in a significant gap between the minimum wage and a living wage.

The hierarchy of the listed elements is also problematic. A living wage estimate should be ranked higher than the publication of a minimum wage. It would therefore be more logical to reverse the order: if a living wage estimate is not available, then a minimum wage can be published. As currently formulated, a company that can report 100% of employees earning at least the minimum wage and labels this as adequate could be perceived as performing better than a company that can report a living wage for 80% of its employees. Since a living wage is higher than a minimum wage, this presents a misleading picture and sends the wrong incentives to companies.

29) SFDR and other EU datapoints in Appendix B of Amended ESRS 2

The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction.

Appendix 4 in the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now 1). The key changes for Social Standards (ESRS S1-S4) are:

- a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social Standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social Standards.
- b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified.

There were no changes in the ESRS G1.

In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased.

Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS notes that alignment with SFDR remains of crucial importance. In light of the upcoming SFDR revision, the revision of Annex I PAIs is also under consideration; it is crucial that sustainability-related disclosures under the SFDR rely on available reported data by undertakings under the CSRD. In the meantime, EFRAG should ensure that it retains within the ESRS all datapoints corresponding to the 14 mandatory PAIs. All SFDR Table 1 datapoints must remain mandatory within the ESRS topics, if material. These indicators are essential for the functioning of the SFDR and must remain fully available to financial institutions.

A key concern remains that not all mandatory SFDR PAI indicators are yet fully covered by ESRS datapoints. In particular, PAI 3 (GHG intensity of investee companies) and PAI 6 (Energy consumption intensity) are not directly addressed. For financial institutions this creates significant challenges: if they are required to calculate these indicators themselves, it will be resource-intensive, risk inconsistent methodologies across the market, and ultimately run counter to the policy objective of reducing reporting burdens. These challenges are underestimated in EFRAG's reasoning for deletion.

For the Social Standards (S1–S4), SFDR-related datapoints corresponding to PAI 10 (Severe human rights violations) and PAI 11 (UN Global Compact/ OECD Guidelines alignment) have been spread across the four standards. While this strengthens alignment with international due diligence frameworks (UNGP and OECD MNE Guidelines) and the ESRS double materiality approach, it complicates SFDR reporting. Investors must consolidate disclosures across multiple standards to report a single PAI indicator, increasing complexity and the risk of inconsistency. Greater centralisation or clearer cross-references would improve usability without undermining ESRS principles.

30) ESRS E4 DR E4-4

ESRS E4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets. As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS Set 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN.

Do you agree that EFRAG should review AR 26 in Amended ESRS E4? Please provide suggested wording.

☒ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☐ NO

You are invited to provide suggestions for improvements, if any. [TEXT BOX – 300 words]

We agree. The ESRS GDR-T still require companies to publish information on the methodology, baseline value, scope of target etc.

31) ESRS S1 DR15: Gender pay gap

Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint.

The voluntary datapoint on adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in ESRS Set 1. The deletion of the voluntary datapoint aligns with the general approach in the revised architecture.

Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS notes that the simplification of the ESRS is grounded in the “decision-usefulness” principle, enabling users, including asset managers, to assess and make informed decisions based on the availability of sustainability information. We emphasize that the adjusted gender pay gap is a significantly more relevant indicator for investors than the unadjusted gender pay gap.

We do understand that the mandatory unadjusted pay gap metric has been introduced to align with the SFDR PAI requirements, and indeed alignment with the SFDR is crucial. Furthermore, with the implementation of the EU Pay Transparency Directive, the unadjusted pay gap information will become much more broadly available through company-level gender pay reporting. However, the Directive also requires a joint pay assessment (Article 10) when gaps exceed 5%, using objective, gender-neutral criteria to explain and address disparities. This requirement in fact produces the adjusted pay gap information, but the outcomes do not have to be reported by the companies.

We therefore ask EFRAG to align the ESRS with this directive and include under the ESRS the key mandatory KPIs of the Pay Transparency Directive, including (in case of significant pay gaps above the defined threshold) a requirement to also disclose the adjusted pay gap in a way that is methodologically aligned with the joint pay assessment requirement. The ESRS requirement is of course subject to the topic having been identified as material for a company. Such alignment will significantly increase decision-usefulness for investors.

We further note that EFRAG should also reiterate to the European Commission the importance of the EU Pay Transparency Directive being incorporated into national legislation by 7 June 2026, as this is essential to ensure consistent availability of this information across Member States.

32) ESRS G1 DR G1-2 and G1-6: Payment practices

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The revision of ESRS G1 have led - amongst others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs.

Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SMEs?

☐ YES

☐ PARTIALLY AGREE/PARTIALLY DISAGREE

☒ NO

[COMMENTS – max 300 words]

DUFAS is not supportive of the proposed changes, given that the procurement practices of large undertakings and the management of suppliers could be more transparent, as stringent practices may lead to a higher likelihood of negative impacts. This is for example the case when orders with strict deadlines can result in workers having to work overtime.

33) Overall feedback per standard

The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal.

Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation:

1. Definition of value chain for financial institutions (ESRS 1);
2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1);
3. Relief for omission of confidential/sensitive information (ESRS 1);
4. Phasing-in provisions (ESRS 1);
5. Clarify the meaning of 'compatibility with 1.5 degrees' for the Transition Plans disclosure (ESRS E1).

In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards.

If you intend to comment also at level of single DR in **Part 3 of this questionnaire**, you are kindly invited not to repeat the same content twice (here and in Part 3).

You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this [li](#)

In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this [link](#).

Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?

	I agree	I PARTIALLY AGREE/PARTIALLY DISAGREE agree	I disagree
ESRS 1	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
ESRS 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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ESRS E1	()	()	()
ESRS E2	()	()	()
ESRS E3	()	()	()
ESRS E4	()	()	()
ESRS E5	()	()	()
ESRS S1	()	()	()
ESRS S2	()	()	()
ESRS S3	()	()	()
ESRS S4	()	()	()
ESRS G1	()	()	()
Glossary	()	()	()

[IN ALL CASES COMMENTS ALLOWED – each item **300** words]

DUFAS reiterates its position that client assets should be explicitly excluded from the scope for purposes of CSRD reporting. In particular, some requirements have not been amended in the proposed revised ESRS, as they are indicated to be subject to Level 1 changes, including the value chain for FIs. Therefore, we do not interpret any changes that might indicate reference to the value chain for FI as such, including ESRS 1 paragraph 38 and ESRS 2 paragraph 68. We do welcome further clarity on the definition of FIs own operations in L1, in line with the presentation in paragraph 59 (p.42) of Log of Amendments ESRS 1 General Requirements stating that own operations relate to “assets, liabilities, income and expenses”.

EFRA also notes that some requirements were not changed in the amended ESRS as they are subject to level 1 changes, for example regarding ‘compatibility with 1.5 degrees’ for the Transition Plans disclosures. However, clarification is needed, for example regarding the base year (reference point) for measuring the reduction of greenhouse gas emissions and setting climate targets. Guidance on the comparability between disclosures, where the implementation year among different companies differs, as the CO2 data improves over time, would be helpful and would establish an accepted way of working for external auditors to ensure reliable information.

By way of guidance, we propose EFRA to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes. For financial accountability reports, including annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.

34) Any other comments

Please provide here any other comments **on the 12 EDs or on the Glossary** [max **300** words]

Regarding the inclusion of non-material information by user request, further clarification needed on whether this is only possible at a user's request (ESRS 1 paragraph 108) and the location of these extra disclosures (59 sub b of the BfC).

PART 3: Detailed feedback at level of DR or paragraph of the ED (optional)

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In this part (optional) you can select to provide your opinion on the level of simplification achieved for one or more DR (or chapter in case of ESRS 1) and to provide your comments on the corresponding paragraphs of the 12 Amended ESRS Standards.

You can access the Exposure Drafts of the **Amended ESRS** at this link: [Amended ESRS Exposure Draft July 2025 ESRS E1](#)

In case you would like to see the rationale behind the amendments, you can access the Log of Amendments at this link: [Log of Amendments of the ESRS Exposure Draft July 2025 ESRS E1](#)

Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?

When responding on Part 3 you will have the possibility to provide comments at paragraph level, in addition to commenting at DR (Chapter of ESRS 1) level. If you intend to provide comments at paragraph level, you are invited to do so by using the [provided Excel Template](#) (XLSX file). Please upload the filled in Excel Template in the designated box at the end of the survey. Be aware that comments provided in a different format than the provided template will create technical issues and EFRAG may not be able to process them.

[PLEASE NOTE THAT THERE WILL BE AN INTERACTIVE MENU, SO IN THE DIGITAL VERSION OF THE SURVEY THE RESPONDENT WILL SELECT THE TOPIC AND THEN CHOOSE IF THEY WOULD LIKE TO PROVIDE COMMENTS ON THE CORRESPONDING DR.]

	I agree	I PARTIALLY AGREE/PARTIALLY DISAGREE agree	I disagree	I would like to provide detailed comments on the DR	I would like to provide detailed comments on the paragraphs (via the Excel Template)
Disclosure Requirement E1-1 - Transition plan for climate change mitigation	()	()	()	()	()
Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	()	()	()	()	()
Disclosure Requirement E1-3 - Resilience in relation to climate change	()	()	()	()	()
Disclosure Requirement E1-4 - Policies related to climate change	()	()	()	()	()

Disclosure Requirement E1-5 - Actions and resources in relation to climate change	()	()	()	()	()
Disclosure Requirement E1-6 - Targets related to climate change	()	()	()	()	()
Disclosure Requirement E1-7 - Energy consumption and mix	()	()	()	()	()
Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	()	()	()	()	()
Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	()	()	()	()	()
Disclosure Requirement E1-10 - Internal carbon pricing	()	()	()	()	()
Disclosure Requirement E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	()	()	()	()	()

Providing detailed comments on paragraph level using the Excel Template Excel Template upload

If the respondent wishes to provide comments and suggestions at paragraph level it can do so via an Excel Template, EFRAG recommends to do so by downloading the Template from [here](#). The filled in Excel Workbook

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can then be uploaded as part of this survey. Please note that submissions of any other file that is not based on the Excel Template will not be processed and considered.

Preview of the downloadable Excel Template:

[illegible]

Please upload the Excel Template with detailed comments on paragraphs using the Browse button.

End of the survey

This page concludes and submits the survey. Kindly ensure that all questions you intended to answer have been completed before clicking the submit button.

Thank You!

Thank you for taking our survey. Your contribution is very important to us.

You will receive an email with your submission in a few minutes. **Please, check also your spam folder.**