

# Unpacking CSRD transposition across Europe

**WEBINAR**

**8 OCTOBER, 12:00-13:15 CEST**



**ACCOUNTANCY  
EUROPE.**





**WELCOME**

**Vita Ramanauskaitė**

**Manager, Head of Sustainability**



**CLOSE TO 1 MILLION  
PROFESSIONALS**



**26 EU  
MEMBER STATES**



**49 INSTITUTES**



**35 COUNTRIES**



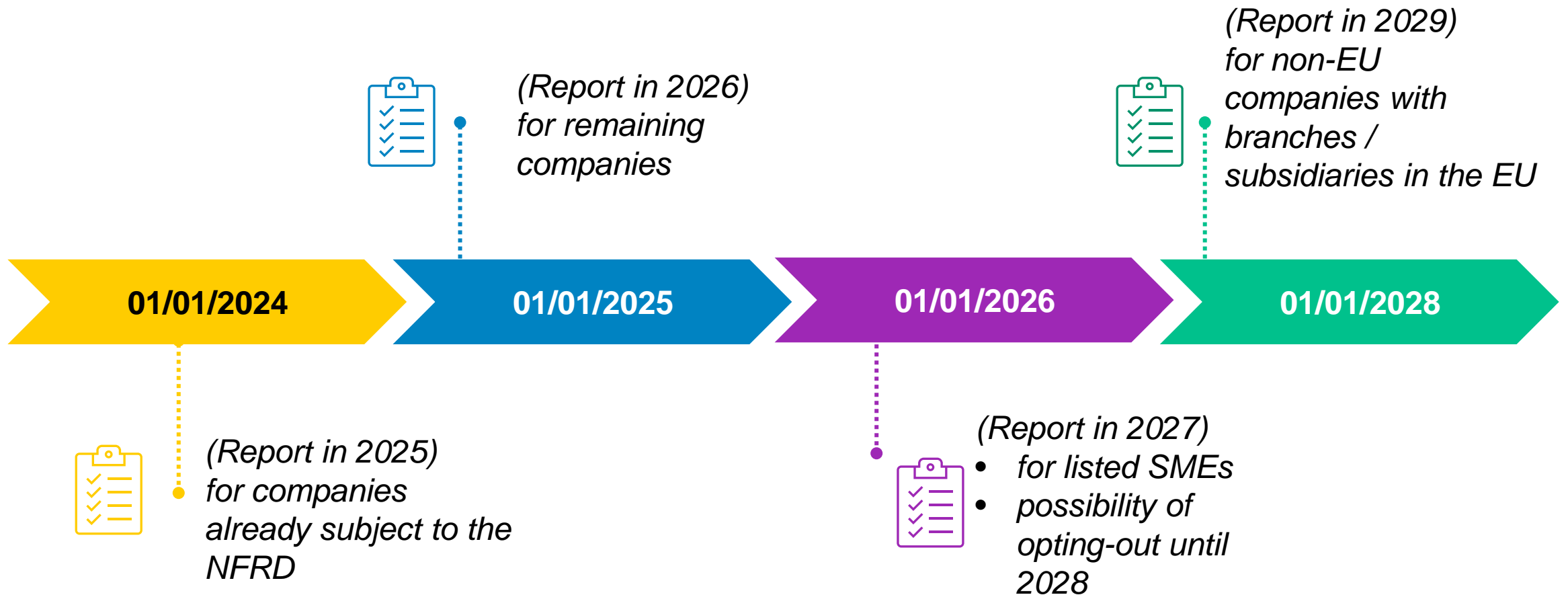
# **EU CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD)**

# CSRD – key changes

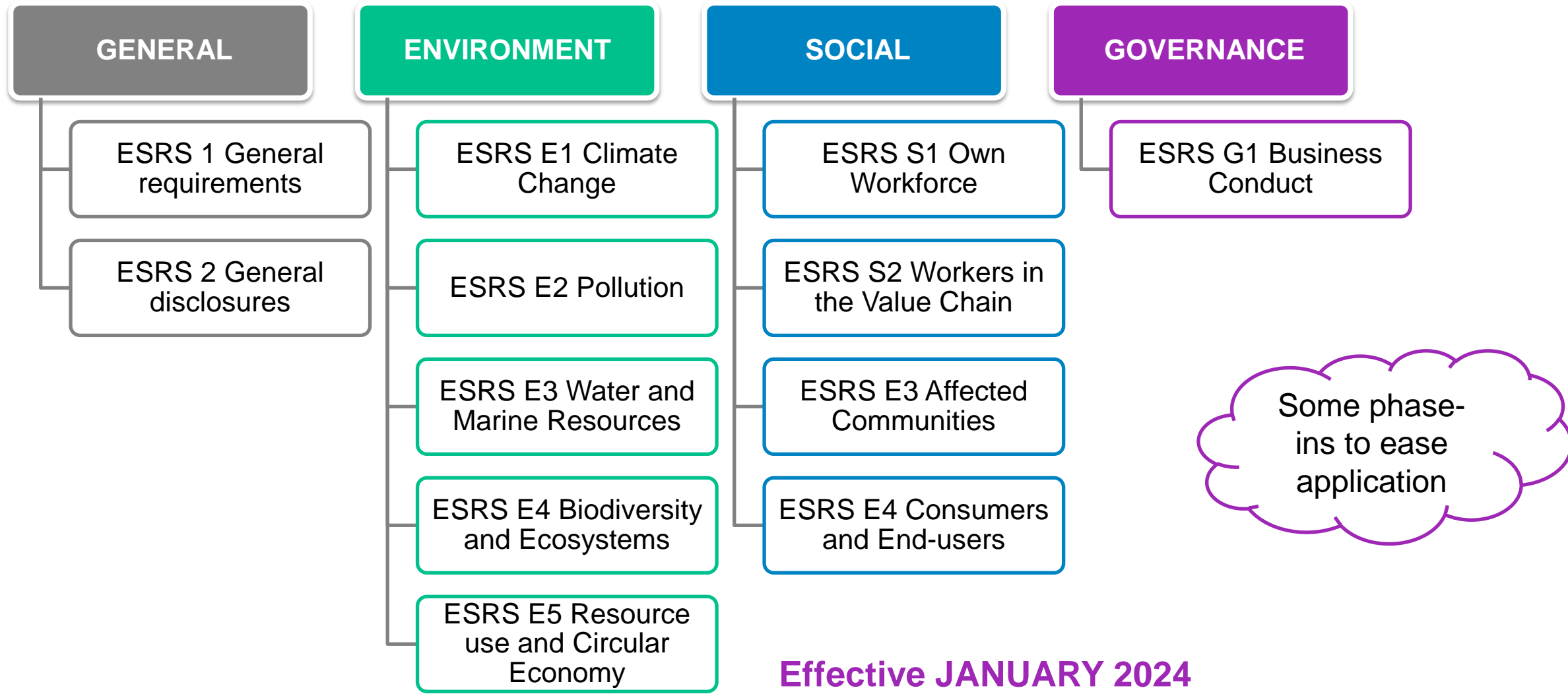
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- Expanding **scope** for all listed & large companies, from 12k to 42.5k EU companies
- Mandatory reporting in accordance with **European Sustainability Reporting Standards (ESRS)**
- **Digital tagging** of reported sustainability information in accordance with taxonomy
- **Requirement for (limited) assurance** over sustainability reporting
- Law transposition in EU Member States to be done **by 6 July 2024**

# CSRD application



# European Sustainability Reporting Standards – Set 1



284 Pages ESRS, 1134 Datapoints, 83 Disclosure requirements

# CSRD: assurance

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- EU-wide **limited assurance requirement**, ultimate goal is **reasonable assurance** (= audit)
- Statutory auditor's opinion on sustainability reporting
- EU Member States can permit **another auditor** or **independent assurance service provider (IASP)**

## EU assurance standards

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- EC shall adopt EU assurance standards via delegated acts:
  - **limited assurance standards** by 1/10/2026
  - **reasonable assurance standards** by 1/10/2028
- MS may apply national assurance standards, procedures or requirements in the meantime
- CEAOB non-binding guidelines on limited assurance on sustainability reporting (Sep 2024)



# CSRD – professional education

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- Statutory auditors have to acquire **theoretical & practical** knowledge should be acquired on sustainability reporting and assurance
- **(at least) 8 months** of practical **training** in sustainability assurance or other sustainability related services
- CSRD foresees a grandfathering clause
- Member States should set out equivalent requirements for IASPs (if authorised) as regards training and examination, continuing education

# CSRD: Member State options

<p>...may exclude certain undertakings from the CSRD scope on a case by case basis (under CRD)</p>	<p>...may permit to exclude commercially sensitive information from sustainability reporting</p>	<p>...may require that the consolidated management/sustainability report is published in an accepted language</p>	<p>...may require undertakings to publish the management report on their website or make a copy available upon request</p>	<p>...may allow a statutory auditor other than the financial statements auditor to express the opinion on sustainability reporting</p>	<p>...may allow an independent assurance services provider to express the opinion on sustainability reporting</p>	<p>...may require subsidiary undertakings and branches to send information about net turnover generated in the Member State and in the EU</p>
<p>....may permit that periods of study can count towards professional activity periods (related to qualification through long term experience of statutory auditors)</p>	<p>...MS may apply national standards, procedures or requirements pending the Commission's adoption of an assurance standard on the same subject matter</p>	<p>...the assurance report may be included as a separate section of the audit report where the same statutory auditor carries out the assurance engagement</p>	<p>....may allow for a transition period for persons carrying out quality assurance reviews on sustainability reporting by exempting them until the end of 2025 from the requirement to have relevant experience in sustainability reporting or the assurance of the same</p>	<p>...may decide not to lay down rules for administrative sanctions for infringements which are already subject to national criminal law</p>	<p>...may allow the functions assigned to the audit committee relating to sustainability reporting and relating to the assurance of sustainability reporting to be performed by the administrative or supervisory body as a whole or by a dedicated body established by the administrative or supervisory body</p>	<p>...may exempt undertakings from filling the management report with the Companies Registration Office provided the report can be readily obtained from the undertaking at a price not exceeding its administrative cost</p>



# CSRD TRANSPOSITION: INSIGHTS

# CSRD transposition status (EEA countries)

## Transposed

- Bulgaria
- Croatia
- Czech Republic\*
- Denmark
- Finland
- France
- Hungary\*
- Ireland
- Italy
- Lithuania
- Romania\*
- Norway
- Slovakia
- Sweden

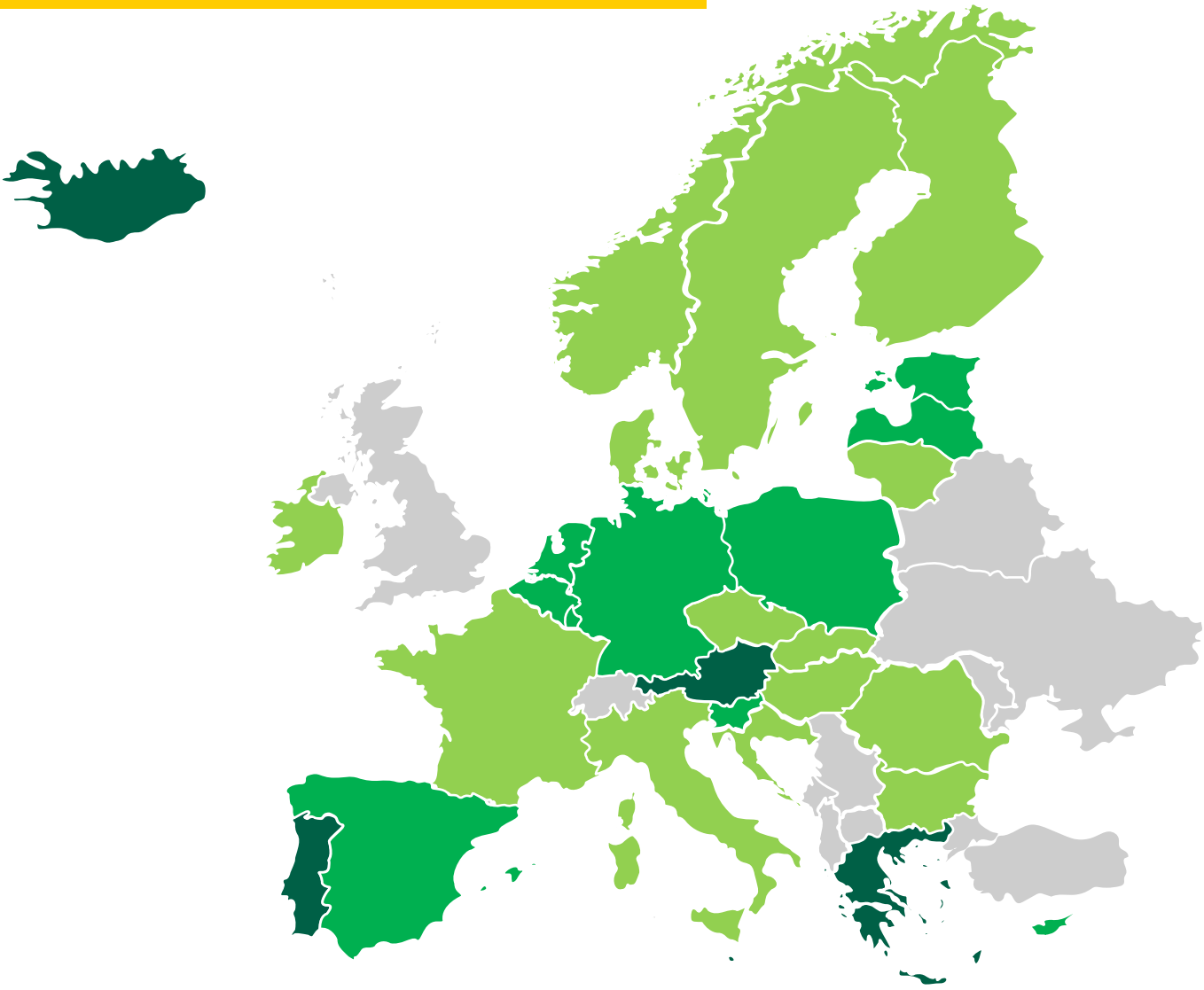
\*CSRD has been partially transposed

## Draft/law proposal

- Belgium
- Cyprus
- Estonia
- Germany
- Latvia
- Luxembourg
- Netherlands
- Poland
- Slovenia
- Spain

## Draft 'in progress'

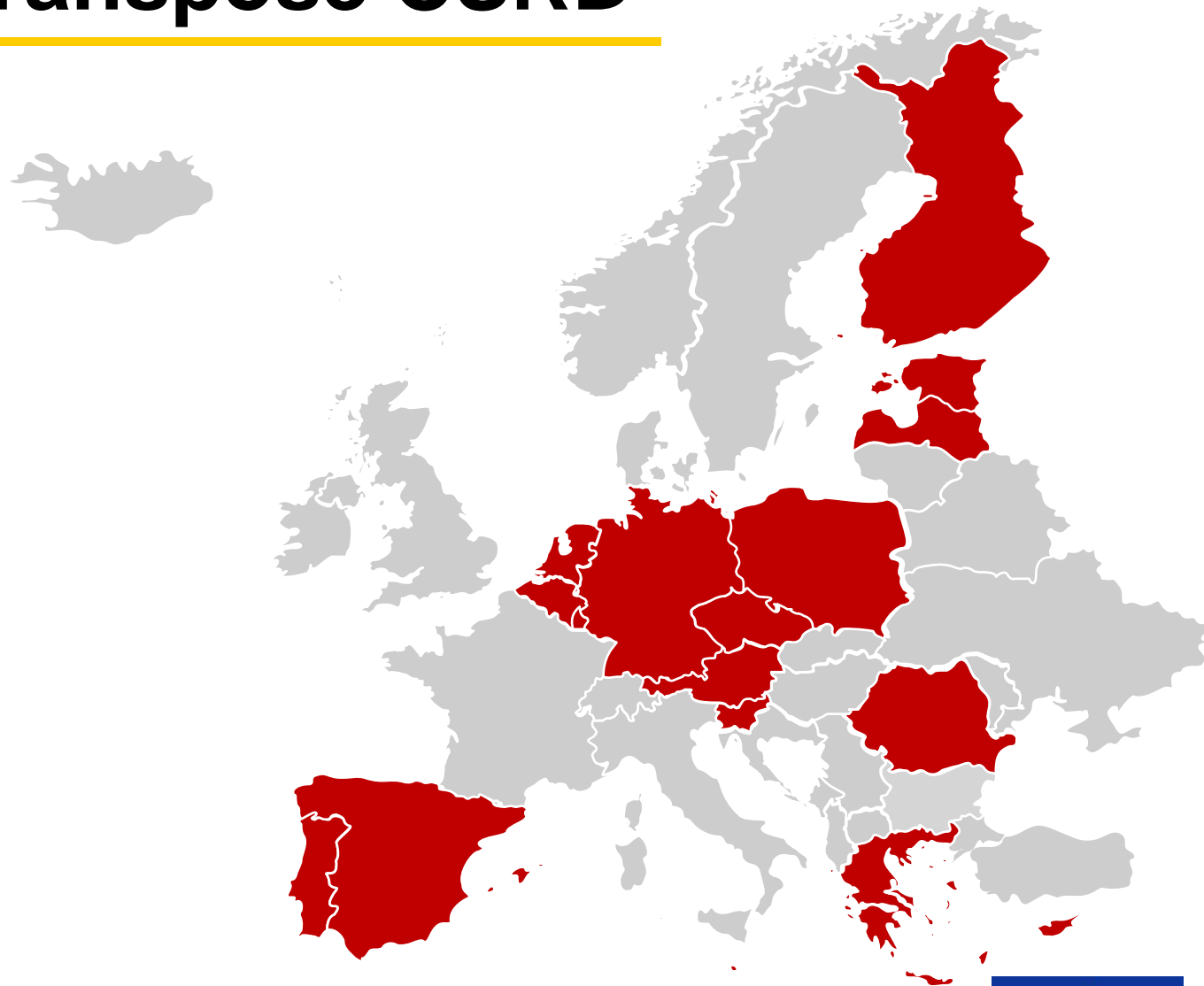
- Austria
- Greece
- Iceland
- Malta
- Portugal



# EC calls on MS to fully transpose CSRD

The EC sent a letter of formal notice to 17 Member States for failing to notify their national measures to transpose the CSRD

- Austria
- Belgium
- Cyprus
- Czech Republic
- Estonia
- Finland
- Germany
- Greece
- Latvia
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovenia
- Spain



# Sustainability assurance provision

- by another auditor: likely in +/- all MS
- by independent assurance service provider (IASPs)

## Yes

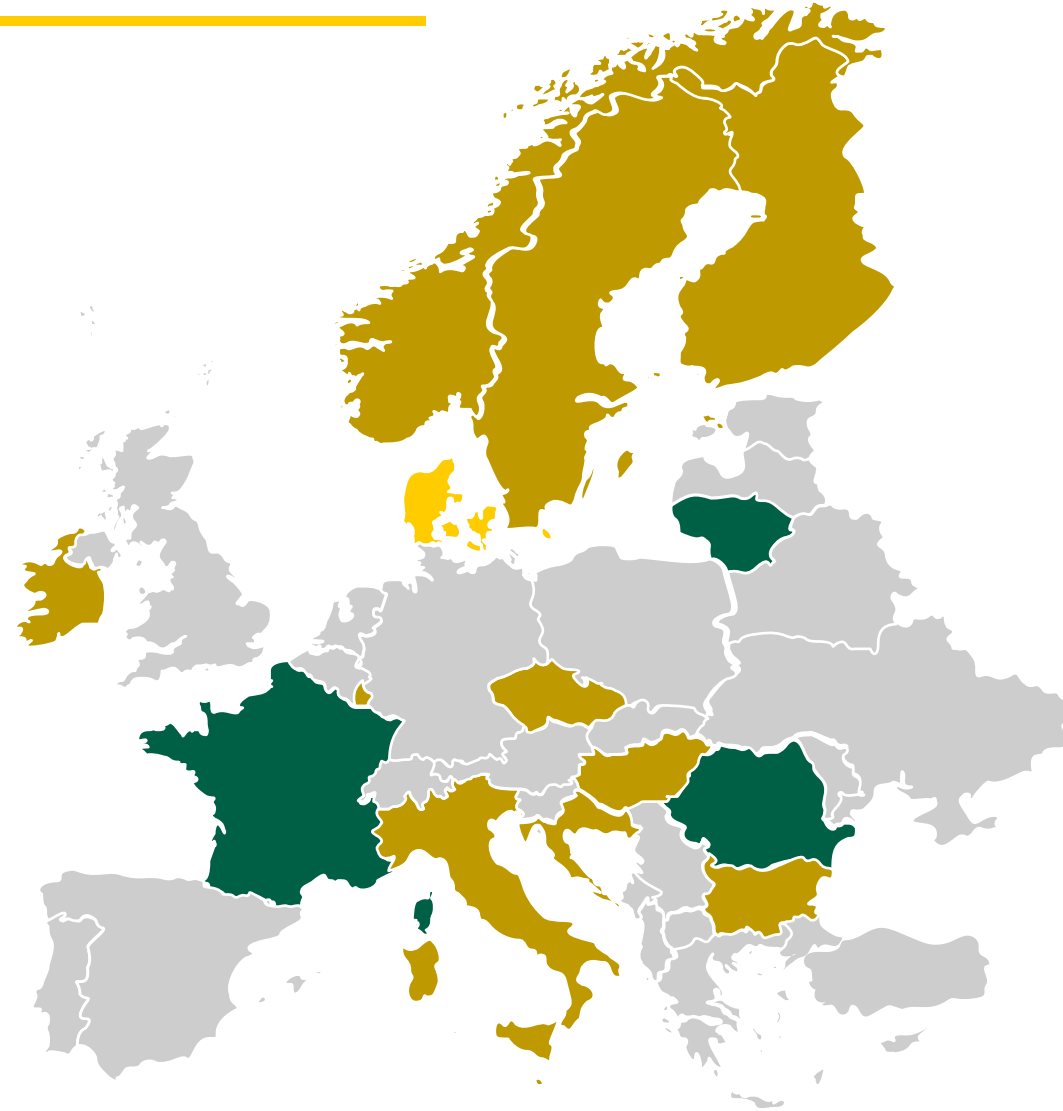
- France
- Lithuania
- Romania
- Czech Republic
- Finland
- Hungary
- Ireland \*

## Likely

- Denmark
- Italy\*
- Norway\*

## No

- Bulgaria
- Croatia\*
- Sweden



\*These countries might opt for IASPs in the medium to long term (e.g. after 3 years' time)  
Slovakia did not provide any indication yet

# National assurance standard

MS may apply national assurance standards, procedures or requirements

## Yes

- Croatia
- Czech Republic
- Finland
- France
- Ireland
- Italy
- Sweden

## Likely

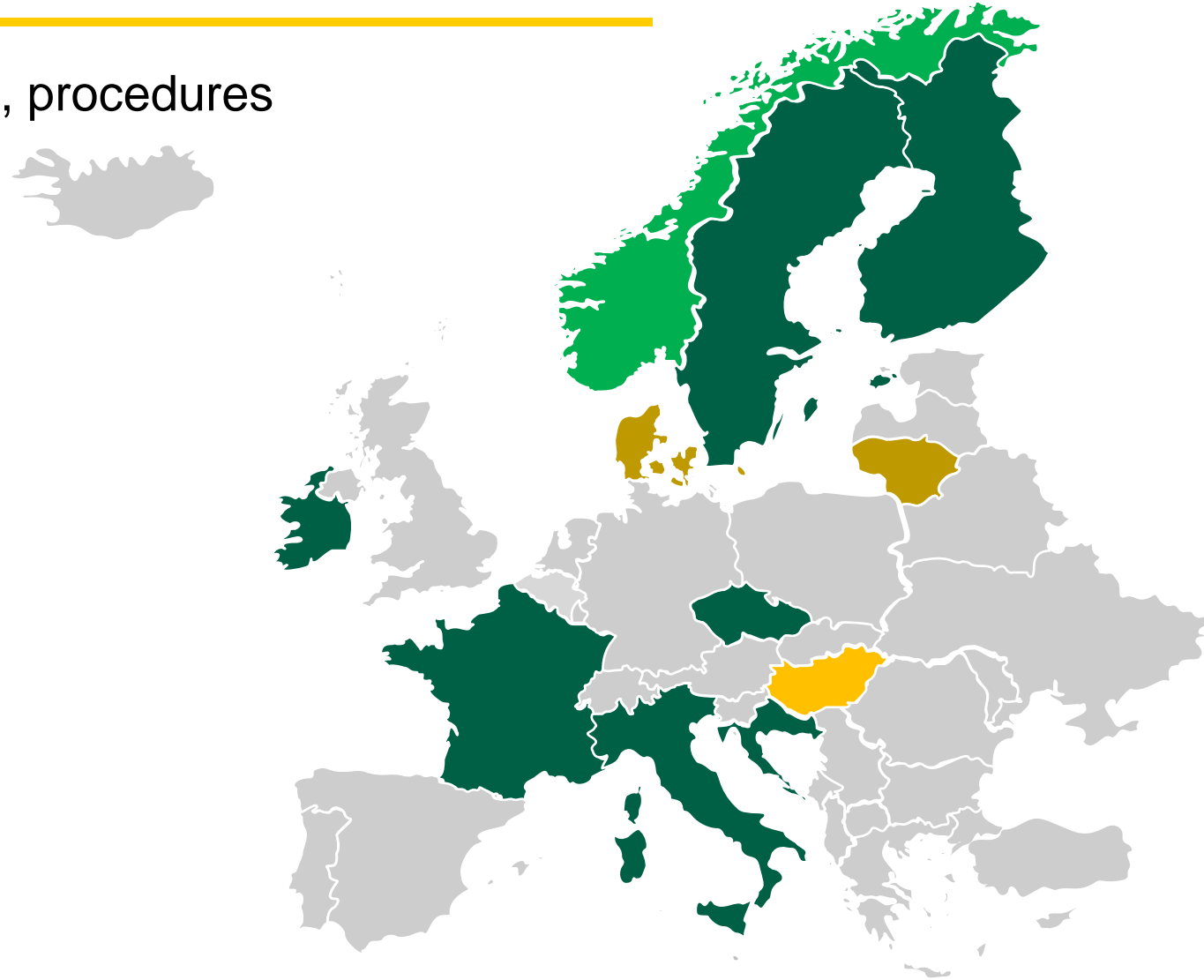
- Norway

## Unlikely

- Hungary

## No

- Denmark
- Lithuania





# UNPACKING TRANSPOSITION

- **Anne Lenglet**, Sustainability Reporting Technical Leader, PwC
- **Vaida Kačergienė**, President, Lithuanian Chamber of Auditors
- **Petra Jirková Bočáková**, Director, ESG Core Assurance Leader, PwC
- **Sara Lissdaniels**, Sustainability Specialist, FAR (Institute for the accountancy profession in Sweden)





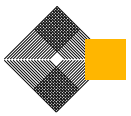
# UNPACKING TRANSPOSITION IN FRANCE

**Anne Lenglet**

Sustainability Reporting Technical  
Leader, PwC

# CSRD – Transposition in France





# Overview of the main points of the transposition in France



**Scope and application dates & Specific thresholds for large groups**

**Laws impacted by the CSRD**

**Content & Possibility of omitting certain information**

**Oversight & Dedicated committee**

**Assurance**

**Sanctions**





# French entities in scope and application dates

## New legal entities

- All companies in commercial form including **SAS**
- All credit establishments and insurance companies, regardless of their legal form
- **Other specific French entities** such as cooperative companies

## Application dates

### No change compared to CSRD

The first application dates will be:

- in 2025, for the 2024 financial year: large public interest entities with more 500 employees.
- in 2026, for the 2025 financial year: other large entities not meeting the criteria set out above;
- in 2027, for the 2026 financial year: listed SMEs;
- in 2029, for the 2028 financial year: non-EU groups



# French definition of large groups

## Specific thresholds for large groups

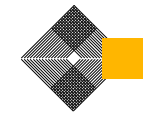
- **"Large groups"** that exceeds 2 of the 3 thresholds:
  - > € 30M balance sheet (vs € 25M);
  - > € 60M turnover (vs € 50M);
  - > 250 employees

## Large groups =

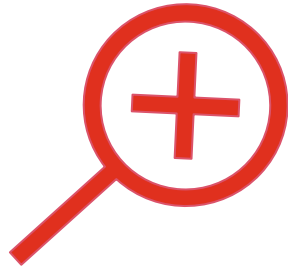
consolidating parent and companies under **exclusive and joint control**



In France thresholds have to be assessed before eliminating intra-group operations



# Laws impacted by the CSRD



## French laws impacted by the CSRD

Today various extra-financial transparency systems for companies (regulatory millefeuille with redundancies)

**DPEF**

**Devoir de  
vigilance**

**BEGES**

....



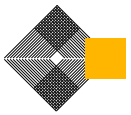
# Contents of the sustainability reporting

**Possibility of omitting certain information (relating to impending developments or matters in the course of negotiation)**

- the disclosure of such information would be seriously prejudicial to the commercial position of the undertaking
- provided that such omission does not prevent a fair and balanced understanding of the undertaking's development, performance and position, and the impact of its activity



**In exceptional cases**



# New responsibilities of the audit committee or another specialised committee

## Dedicated committee vs Audit committee

*France allows the functions assigned to the audit committee relating to sustainability reporting and relating to the assurance of sustainability reporting to be performed by a dedicated body established by the administrative or supervisory body*

- Monitoring the preparation process of **the two reports**
- Monitoring the effectiveness of internal quality control, risk management and internal control systems for **both reports**
- Monitoring the internal audit, if applicable, in connection with **the two reports**

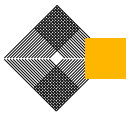




# The certification of sustainability information

**Who will be able  
to certify the  
information ?**

- **Statutory auditor(s)** (French CAC)  
Joint verification possible with the Co-CAC
- **or another auditor**
- **or accredited independent third-party body (OTI)**
  - for example, lawyers or chartered accountants
  - same requirements as statutory auditors in terms of training, independence and inspection by the H2A



# What are the provisions regarding the mandate ?

## Duration of the mandate

**Mandate of 6 years**  
at the shareholders' meeting

### **Alternatives possible for the 1st nomination**

#### **1st nomination :**

- for the **remaining duration** of the financial audit mandate
- **or for a mandate of 3 years, then 6 years**
- **or 3 years then** for the remaining duration of the financial audit mandate

No mandatory tender offer



# Assurance - French guidelines from H2A



**H2A national guidance for assurance engagements (published 2nd Oct. 2024) :**  
<https://h2a-france.org/publications/la-h2a-publie-les-lignes-directrices-relatives-a-la-mission-de-certification-des-informations-en-matiere-de-durabilite-et-des-informations-taxonomie/>



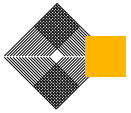
# Education qualification requirements

For CAC and OTI  
registered before  
1 January 2026

- a **transitional regime** : "grandfather clause"
  - which replaces the permanent regime
  - and requires the completion of **90 hours** of specific training in sustainability approved by the H2A

For CAC and OTI  
registered from  
1 January 2026

- a **permanent regime**
  - which requires the completion of a training period of **8 months** with a professional authorised to perform sustainability audit assignments
  - and the successful completion of a **written test** on sustainability



# A limited assurance report that mentions the consulting of the CSE

Limited Assurance Report: 4 distinct conclusions	
1	Compliance of the DMA process with ESRS
2	Compliance of information provided in the sustainability statement with ESRS
3	Compliance of Taxonomy with EU regulation
4	Compliance of ESEF tagging

## Obligation of consulting the social and economic committee (CSE)

### Consultation of the CSE during 3 recurring consultations:

- ❖ on the strategic orientations of the company
- ❖ on the economic and financial situation of the company
- ❖ on the social policy of the company, working conditions and employment



**In France, the auditor must specifically confirm in his report that the CSE was consulted**



# French specific sanctions

## Specific Sanctions

### Sanctions relating to the sustainability report

- Any person may request the court:
  - Either to order the company (under penalty) to communicate the report
  - Or to appoint a representative responsible for this communication
- Possibility of excluding from public procurement procedures the company which has not published its sustainability report

### Sanctions relating to failure to appoint the CAC or the OTI

- Failure to appoint a CAC or OTI:  
€30,000 fine and two years imprisonment for the manager
- Obstructing the CAC or OTI checks:
  - €75,000 fine and five years imprisonment for the manager



# Corporate Sustainability Reporting Directive Transposition in Lithuania

Vaida Kačergienė  
Lithuanian Chamber of Auditors

# Local Legislation

**In place and effective from 1 July 2024**

No separate law – instead, change of

Financial Statement Audit Law

to

**Financial Statement and Other Assurance Service Law**



# Sustainability Assurance Specialists – Auditors and IASPs

## Certified Members of Lithuanian Chamber of Auditors (LCA)

Certified auditors – full membership

IASPs – associated members

Until 31 December 2025

From 1 January  
2026

Expected from  
second half 2025

20 hours  
qualification  
course and  
certification  
without exam

Courses  
organised only by  
LCA

Courses program  
reconciled with  
POB and officially  
published as  
legal document

8 month practice

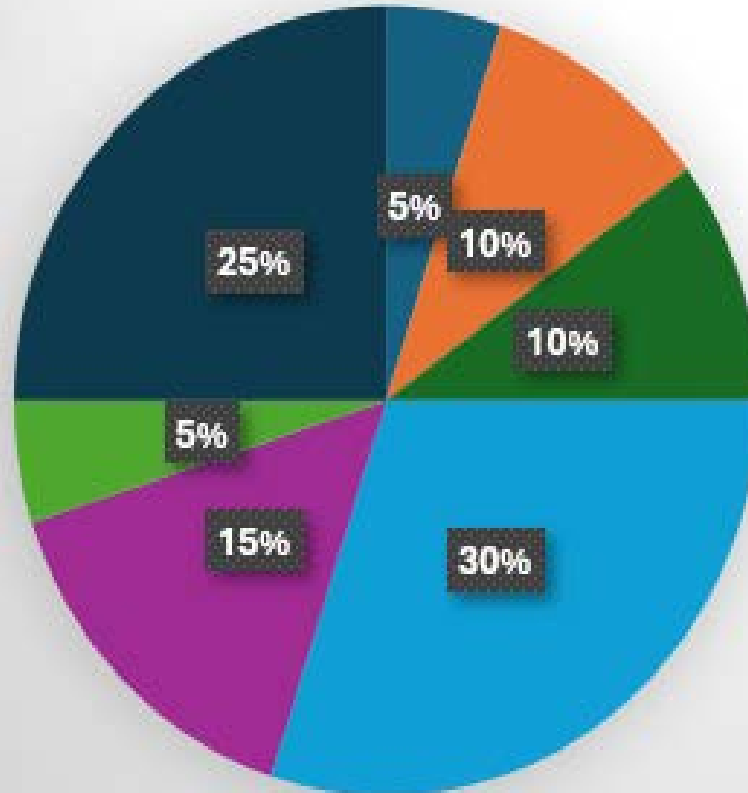
Exam organised  
by LCA

8 month practice

Exam organised  
by LCA



# Qualification Courses



- I. The concept and structure of sustainability
- II. The EU Green Deal and the EU Taxonomy for Sustainable Activities
- III. Regulating sustainability accountability and assurance in the EU
- IV. Sustainability reporting standards
- V. Putting sustainability reporting requirements into practice
- VI. Professional ethics and quality assurance
- VII. Sustainability reporting standards and their application

# Service providers – Legal Entities

Assurance service may be provided only by legal entities having certified sustainability assurance specialist

(individual specialist may register individual activity, but this is equalised to a legal entity status)

**Audit Firms**

Registered by LCA and  
under supervision of LCA

**Non Audit Firms**

Certified by National  
Accreditation Office

# Quality Assurance – System of Quality Management

Service provider

Audit firm - mandatory ISQM

Non audit firms

PIE Audit and Assurance

Non PIE Audit and Assurance

ISQM non mandatory,  
requirements to be determined

Lithuanian POB (AVNT)

Lithuanian Chamber of Auditors  
(LCA)

National Accreditation Office

# Quality Assurance – Assurance Report

Service provider and specialist

Audit firm

Non Audit Firm

PIE Audit and Assurance

Non PIE Audit and Assurance

PIE Sustainability Assurance

Non PIE Sustainability Assurance

Lithuanian POB (AVNT)

Lithuanian Chamber of Auditors (LCA)

Lithuanian POB (AVNT)

Lithuanian Chamber of Auditors (LCA)

# Sustainability Practice and Exam

Requirements for practice to be determined (ongoing process)

- For auditor's assistances registered in LCA, 8 months sustainability practice might be included in 3 years total mandatory practice as auditor's assistant

Challenges:

- Starting date
- Criteria for evaluation of qualification of practice passed
- Timing

Exam:

- Organised by LCA
- 1 exam
- At least some part shall include ethics, independence, quality management, assurance process and reporting

# Continues Training in Sustainability

## Auditors

- Continues training in sustainability
- Mandatory scope not determined
- Included in mandatory 120 hours continues training per 3 years
- Required only for those who will be certified as sustainability auditors

## IASPs

- Continues training in sustainability
- Mandatory not less than 16 hours per year
- May be in Lithuanian Chamber or elsewhere
- Mandatory to report to Lithuanian Chamber of Auditors

# Q&A ?

THANKS FOR YOUR ATTENTION 😊





# CSRD transposition in the Czech Republic

Ing. Petra Jirková Bočáková, FCA

**Ing. Petra Jirková Bočáková, FCA**

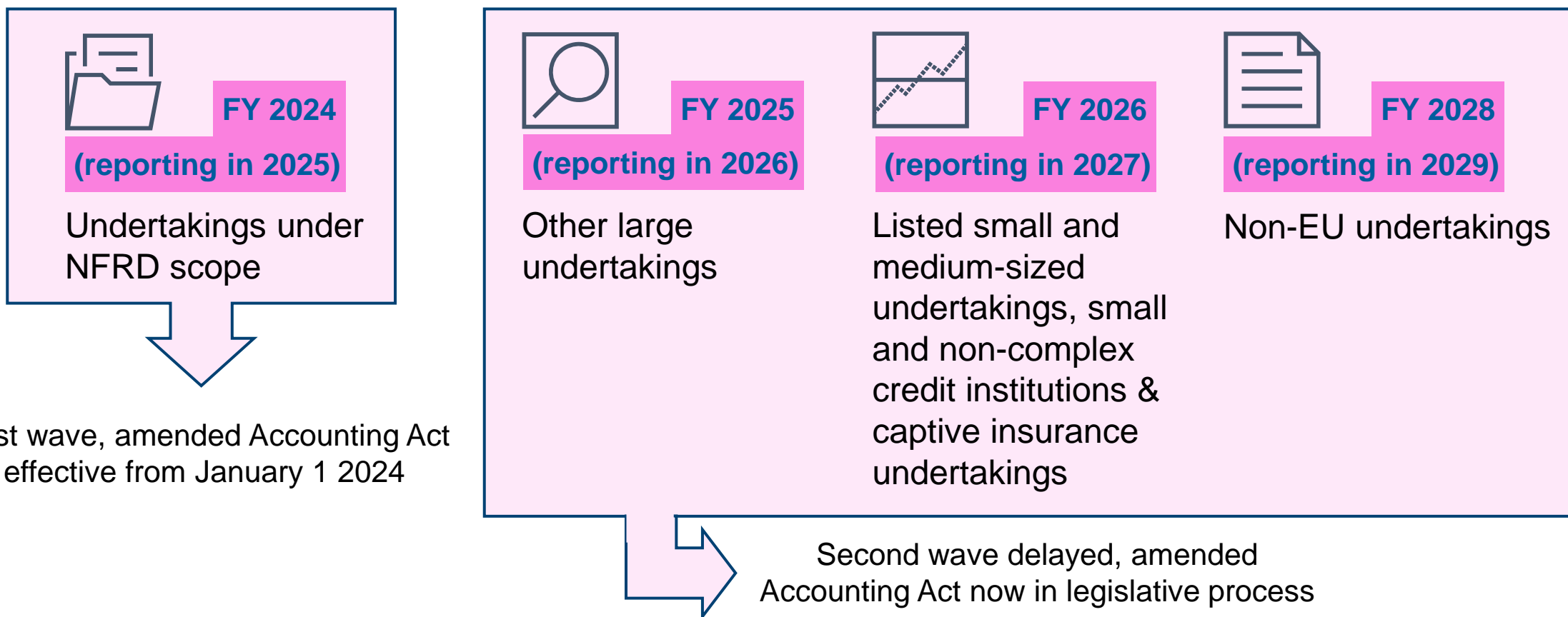
Director in the Audit Department of PwC

Chairperson of the ESG subcommittee of the Chamber of  
Auditors of the Czech Republic



# Accounting Act - scope

- In line with CSRD, no extension on scope proposed
- Estimation ~ 2 000 companies in total
  - But the number of the actual reporters will be lower due to consolidation exemption



# Supervision & penalties

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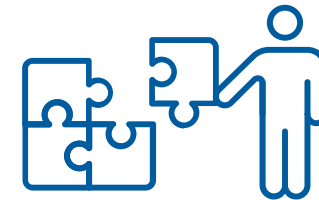
- Supervision of reporting requirements: **Ministry of Finance**
- Penalties for failure to issue a sustainability report
  - Fine of up to 3% of the total value of assets (resp consolidated assets) can be imposed for this offence
  - Offences are dealt with by the tax office



# Options chosen in the Czech Republic

## Amendments to Accounting Directive 2013/34/EU

- Information relating to **impending developments** or **matters in the course of negotiation** is allowed to be **omitted in exceptional cases** where, in the duly justified opinion of competent bodies, the disclosure of such information would be **seriously prejudicial to the commercial position** of the undertaking, unless failure to provide this information would make it impossible to fulfill the purpose of the sustainability report
- Statutory auditor other than the statutory auditor of the financial statements is allowed to express an assurance opinion on sustainability reporting
- **No IASPs** to provide sustainability assurance services → no existing supervisory authority, high administrative costs and small local market



# Options chosen in the Czech Republic

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## Amendments to Audit Directive 2006/43/EC

- Educational requirements for licensed auditors registered with the Chamber of Auditors of the Czech Republic to be approved to carry out sustainability assurance
  - 1) Those who complete all exams and get their licence before 31 December 2025 will need to comply with **specific CPD requirements**
    - Min. 40h ESG training „add on“ + knowledge check
    - Until 31 December 2025
  - 2) Those who complete the exams and get the licence after 31 December 2025
    - Written exam of professional competence and 8 months experience in doing ESG assurance
- Assurance standard **ISAE 3000**, later **ISSA 5000** after coming into force
  - Before the EC adopts an EU-level assurance standard
- Flexibility to include assurance report on sustainability reporting as a standalone report or a separate section of audit report
  - When the same statutory auditor carries out both audit of financial statements and assurance of sustainability reporting

# Options chosen in the Czech Republic

## Amendments to Audit Directive 2006/43/EC

- Functions assigned to the audit committee relating to sustainability reporting and assurance will not be performed by the administrative or supervisory body
- Investigations and sanctions - same as for statutory audits
  - Administrative sanctions conducted by the Chamber of the Auditors of the Czech Republic or Public Audit Oversight Board (defined offences)
  - Criminal offense under the Criminal Code – issuance of a false certificate and report



# Thank you for your attention

✉ [petra.bocakova@pwc.com](mailto:petra.bocakova@pwc.com)





# UNPACKING TRANSPOSITION IN SWEDEN



**Sara Lissdaniels**

Sustainability Specialist, FAR (Institute  
for the accountancy profession in Sweden)

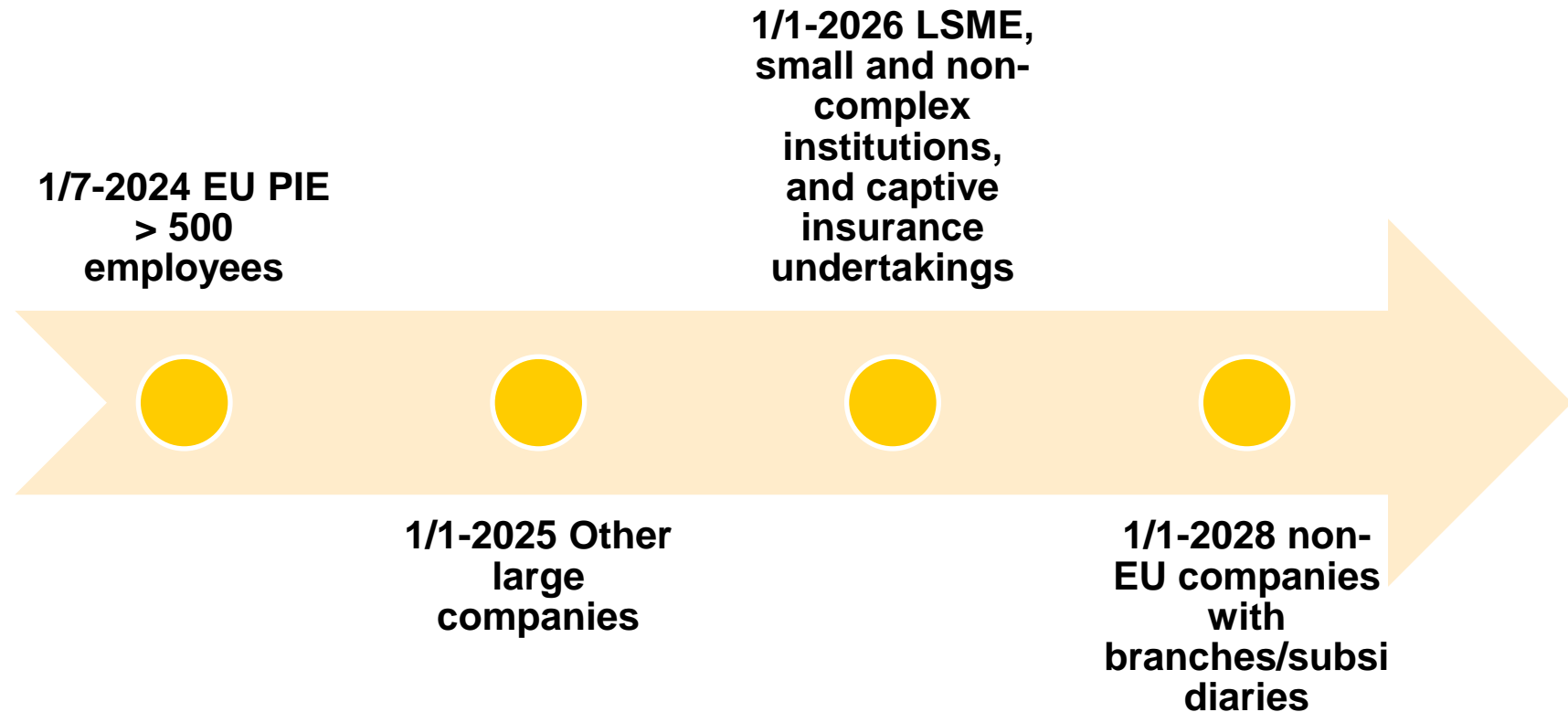


# Scope and application timeline

Companies in scope  
- in line with the  
CSRD,  
approximately:

- 1,600–2,000\* large companies
- 100 listed SMEs
- 140 financial institutions

A smaller number of  
subsidaies and  
branches



# Laws impacted by the CSRD

## Annual Accounts Act

- Including the annual accounts acts for credit institutions and securities companies, insurance companies

## Swedish companies act

- Including the Swedish savings banks act, act on banking and financing operations, act on the securities market the insurance operations, act on Foreign Branches, etc.

## Auditing Act and Auditors' Act

and

the acts on Economic Associations and Swedish Foundations.

- (due to economic associations and foundations are exempt from the reporting requirement)

# Oversight of reporting requirements

## Listed companies

- The Financial Supervisory Authority through the Swedish Accounting Standards Board, i.e., within the framework of existing supervision.

## Non-listed companies

- Not subject to special accounting supervision, i.e., only the assurance performed by the auditor.

# Educational qualification requirements for statutory auditors

- Only statutory auditors
  - Could be another auditor than the statutory auditor for the financial statements
  - Not IASPs
- Theoretical knowledge within the subjects in article 8 Directive 2006/43/EC
  - At university- or firm level.
- Test of theoretical knowledge and practical training
  - The written examination for statutory auditors will include the subjects in article 8
  - No add-on examination
  - Practical training before (in whole or partially) or after the written examination

# Assurance on sustainability reporting

Swedish assurance recommendation RevR 19 *The auditors review of the statutory sustainability report* (published June 26th)

- ISAE 3000
- ISSA 5000
- H3C
- CEA OB
- EU FAQ



**Q&A & CLOSE**

# THANK YOU!

