

ESRS Set 1 revision: Questionnaire for public feedback

1.

Following a public call for contributions from EFRAG, this survey has been prepared by the EFRAG Secretariat to support the collection of written input that will inform the revision of ESRS Set 1.

The contributions will be anonymized and leveraged only in aggregate form, however name of contributors will be made available following your consent.

For viewing purposes, a pdf version of the questionnaire is available [here](#).

Questionnaire for public input on simplification of ESRS

EFRAG wishes to collect input from all the stakeholder categories on how to simplify ESRS, following the [Omnibus proposals](#) issued by the European Commission on 26 February 2025 and the [mandate](#) that EFRAG received on 27 March 2025.

SECTION 1 – PARTICIPANT GENERAL INFORMATION

1.1 Guidance for respondents

Where not specifically indicated, EFRAG welcomes input on question from all stakeholder categories.

Comments are most helpful when they:

- answer questions as stated;
- state the DR or paragraph(s) of ESRS Set 1 to which they relate;
- explained the cause of the identified issue; and
- describe practical example(s) relevant to the questions;
- include clear suggestions of amendments, if appropriate.

Please note the following elements for the compilation of the questionnaire:

Respondents can save the draft questionnaire and return to it at a later time. EFRAG will only consider submitted surveys.

Respondents can select and focus on the areas that are most impactful, thus do not have to consider all questions

For the questions requiring inclusion of a reference to IG3, and for consistency among the different replies, please indicate specific DPs that require consideration in your view by copy pasting the code defined in [IG3 – List of ESRS Data Points](#) (see column ID).

1.2 Respondent profile

Where not specifically indicated, questions refer to all stakeholder categories.

First Name:

Hilde

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Telephone number:

+32473221896

Name of organisation:

Accountancy Europe

Do you consent to make publicly available only the name of your organisation as contributor to this questionnaire, while the content of your contribution will be anonymized and leveraged only in aggregate form?

Yes

Type of organisation (Drop down menu with the following categories):

Other (please specify - textbox to open)

User (subcategories to open):**Other (please specify)**

Accountancy Europe unites 49 professional organisations from 35 countries that represent 1 million qualified accountants, auditors and advisors. Accountancy Europe is in the EU Transparency Register (No 4713568401-18)

Function in the organisation:

Deputy CEO

Country (principal location):

Belgium

Sector(s) (if applicable)

Accountancy sector

If preparer, please specify whether you prepared an ESRS sustainability statement for your 2024 year end:

If yes

Please specify whether it was a voluntary or mandatory application

Please indicate if the ESRS sustainability statement was assured (limited/reasonable)

Please add an hyperlink to the report [add box for including hyperlink]

If preparer, please specify your size in terms of employee number:

2. (untitled)

SECTION 2 – GENERAL ASSESSMENT (OPTIONAL)

As preparer/user/other stakeholder, could you share your overall assessment about the implementation challenges and benefits that you have experienced or observed?

We recognise that many of the current implementation challenges come because of the rushed due process by which the ESRS were developed. The standards had not been field-tested, and therefore, the experience of the first wave reports is the first-field test of the standards. From our perspective, we note the following challenges:

- the overly granular standards (whereby 'material information' is not the overarching concept) which has partially led to overloaded reports where it is difficult to understand how well a company is performing in regards of sustainability
- comparability of reports, even for companies within the same sectors
- different levels of maturity in ESG matters: e.g., ESRS E1 reporting is of a higher quality than other environmental standards
- making double materiality assessments and reporting of only the resulting material information (see our comments below)
- value chain considerations (see our comments below) .

3. (untitled)

SECTION 3 – QUESTIONS

1. PART 1 – HOW TO IMPROVE THE MATERIALITY ASSESSMENT

The Materiality Assessment process is critical to establish the perimeter of the sustainability statement and pivotal to ensure that undertakings only report material information, that they do not report unnecessary information nor dedicate excessive resources to the materiality assessment process.

Initial feedback seems to suggest that required disclosures on the process may be too detailed and the outcome of the process may lead to disclose too many/too detailed IROs. The Omnibus proposals have identified this area as to be clarified.

1.1. From your perspective (preparer/user/others), please share your suggestions on how to improve the ESRS provisions on materiality indicating the most critical and the most useful elements, in relation to

How to improve the ESRS provisions on materiality, in relation to:

- the definition of material impacts, risks and opportunities (IROs) under double materiality assessment

Please detail ESRS provisions on materiality improvements:

See our general comments in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- the process to determine material matters, including how to factor implemented mitigation and prevention actions in the materiality assessment and how to define thresholds striking the right balance between completeness and decision-usefulness of information.

Please detail ESRS provisions on materiality improvements:

See our general comments in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- the process to determine material information to be reported (information materiality, ESRS 1 – paragraph 31 and 34)

Please detail ESRS provisions on materiality improvements:

See our general comments in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- the disclosures related to the process according to IRO-1

Please detail ESRS provisions on materiality improvements:

Considering the experience with the first reports, we invite EFRAG to consider simplifying this disclosure requirement to ensure better reporting particularly as this is a mandatory disclosure requirement. Specifically, we have noticed companies providing boilerplate information or companies reluctant to report information claiming methodologies are 'sensitive information'.

For further general comments, see our response in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- the disclosures related to the outcome of the process (SBM 3)

Please detail ESRS provisions on materiality improvements:

EFRAG could consider simplifying this disclosure requirement as we have noticed challenges for entities to break down their strategy in too much detail or link it with impacts for various reasons, including 'sensitive information'.

For further general comments, see our response in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- the inclusion of material information based on entity-specific disclosures

Please detail ESRS provisions on materiality improvements:

See our general comments in the "Other" box.

In addition, and specifically to this point, it is important to consider the effects of this ESRS simplification/reduction exercise on the entity-specific disclosures. That is why we insist on a process that prioritises relevant information and ensures that the standards retain what would be considered as useful information by users. We caution for automatic deletion of DRs or DPs solely for the sake of achieving an objective of reduction as it may ultimately impair understandability and comparability of ESRS reports. Indeed, if a matter is considered material, entities will report that information either guided by the provisions of the standard, or, if completely missing from the standards, will report only entity-specific information on that impact, risk and opportunity.

How to improve the ESRS provisions on materiality, in relation to:

- the value chain

Please detail ESRS provisions on materiality improvements:

EFRAG's IG2 Value Chain Implementation Guidance provides useful guidance, however, we call for clarification and further guidance on the following:

(a) Value chain boundaries: It is key to determine where the value chain starts and ends, to include it as part of the materiality assessment when identifying material IROs, and to report material information about the value chain. This is particularly important for conglomerates and financial institutions, which may have very large value chains. More guidance and examples, including the factors to consider when determining these boundaries, would help ease reporting burdens. Furthermore, a clear definition of an undertaking's "own operations" should be embedded in the binding legal text (as we witnessed ongoing discussions in this regard, e.g. EFRAG discussions regarding draft ID 803). For consolidated reporting, this definition should include clear rules for the handling of subsidiaries that are not consolidated for financial reporting.

(b) Operational control: we appreciate the useful guidance and examples on operational control in EFRAG's VC IG. However, there is a need for full clarification or interpretation in the environmental ESRS on this principle on:

- assessing operational control, including criteria or factors to be used/considered, how judgement is exercised and how the criteria or factors relate to the accountability of the reporting entity related to the ESG related matters;
 - treating business relationships for various entities, particularly those holding associates in their business model
- These concepts are particularly challenging for financial institutions, as they need clearer definitions and interpretations based on their sector experience. This would include also practical applications of the concepts of value chain for financial institutions, including for example, dealing with a business relationship with the government, addressing the funding element and its impacts over the value chain of the clients, etc. We also call to clarify how these provisions are aligned to those of the Corporate Sustainability Due Diligence Directive.

How to improve the ESRS provisions on materiality, in relation to:

- the aggregation/disaggregation of information

Please detail ESRS provisions on materiality improvements:

See your general comments in the "Other" box.

How to improve the ESRS provisions on materiality, in relation to:

- other (open a box to specify).

Please detail ESRS provisions on materiality improvements:

EFRAG should use stakeholders' feedback from the first-time ESRS reports to understand the challenges and experience with this key concept both in the standards' provisions and in the additional EFRAG guidance. We believe that the double materiality assessment needs to be strengthened to lead to the selection of genuinely decision-useful information to report, which would automatically reduce reporting burden and the number of datapoints reported. As part of this exercise, it could also be useful if as part of strengthening the double materiality assessment, EFRAG reconsidered the relationship between material impacts, risks and opportunities (IROs) and sustainability matters (inducing topics-subtopics) as well as with material information useful for decision-making. We recognise difficulties in mapping or allocating the material IROs resulting from the Double Materiality Assessment (DMA) to the "sustainability matters" (topics, sub-topics, and sub-sub-topics). For example, some IROs are linked to multiple matters, which can lead to duplication, while others—especially entity-specific ones—are not always easy to assign. A reporting structure more focused on material information as a result of material IROs could enhance clarity on how the entity manages its IROs as well as would help avoid redundancies. This would in turn meet the CSRD's objective for sustainability reporting in providing users with an understanding of the material IROs.

This could also include making the 'materiality of information' the overarching principle in ESRS reporting. In addition, it would also be useful to reassess the relationship between 'significant' and 'material' information. EFRAG's IG1 Materiality Assessment Implementation Guidance and IG2 Value Chain Implementation Guidance already address many difficult matters such as the materiality assessment process, consolidation considerations, differences between own operations and value chain. However, the double materiality assessment remains a challenge for preparers, particularly when it comes to quantifying the impacts aspect of the materiality, and prioritising matters. Even though EFRAG provides information on whether and how remediation, prevention and mitigation actions for impacts can be considered when performing the double materiality assessment in IG 1 (FAQ 23), we call for embedding a clear and principle-based approach regarding remediation, prevention and mitigation actions in the impact materiality assessment in the binding legal text.

In addition, as per our ESRS perspectives: materiality assessment (<https://shorturl.at/CNAMk>), we call for the ESRS to clarify as part of the standards to be adopted via delegated act the following items:

- (a) Value chain in the materiality assessment: how to incorporate the value chain in the materiality assessment and how to determine how far to go in the value chain for this assessment
- (b) Group materiality assessments for consolidation purposes: how to consolidate, aggregate and disaggregate IROs?
- (c) Materiality assessment for social topics: materiality for these topics, both for own operations and value chain is new, particularly when adding human rights considerations to the elements of the assessment. Clarification (guidance and examples) on this matter could help stakeholders align their practices and expectations.
- (d) Financial perspective of double materiality: More clarification (guidance and examples) on identifying, assessing and reporting on material risks and opportunities, developed in collaboration with the ISSB would be useful. Particularly, it is important to:
 - emphasise the relationship between IROs, particularly for impacts that give rise to risks and opportunities
 - clarify whether risks and opportunities are to be assessed before actions, and (c) understand how to navigate "opportunities", which borders with sensitive information.
- (e) A process for more complex companies: we call for guidance for financial institutions, conglomerates and multinational enterprises which have very complex own operations and value chains. This would also help align expectations as without clear boundaries, these companies' materiality assessments may include the whole world.

1.2. OPTIONAL: If possible, and if not specified already under point 1.1 above, please identify the narrative disclosure requirements (DRs) or datapoints (DPs) that raised the most critical challenges in determining the material information to be reported and share your suggestions.

Disclosure requirements (DR)

Datapoints (DP)

Comment on challenge:

Suggestion:

Accountancy Europe supports a practical approach to this ESRS revision process based on evidence collected from field-testing the ESRS from the first wave of reporting. Therefore, we suggest EFRAG prioritises the feedback received from preparers and users for this question. However, it is always important to ensure that the revised ESRS are fit-for-purpose in providing decision-useful information that serves as a catalyst towards more sustainable business models.

4. (untitled)

PART 2: HOW TO STREAMLINE NARRATIVE INFORMATION

Narrative information is a key part of sustainability reporting, in particular with respect to governance, strategy, business model, as well as policies, actions and targets (PATs). It is a key factor to meet the quality characteristics of relevance of information and fair presentation^[LS1] of the situation of the undertaking with respect to its sustainability matters. However, narrative information is difficult to compare. In determining the content of narrative information to be reported per disclosure requirements, ESRS combine a principles-based disclosure objective with a list of “shall” datapoints.

Initial feedback seems to suggest that the “shall disclose” datapoints in ESRS Set 1 may be too detailed and too prescriptive in that regard and that a proper balance between relevance/fair presentation, comparability and preparation effort has been difficult to achieve. The Omnibus proposals suggest to consider this point carefully for burden reduction purposes.

2.1. From your perspective (preparer/user/other), please share your suggestions on how to simplify narrative information, in relation to:

The options to reduce the number of “shall” datapoints (DPs):

Deleting datapoints that are not critical

Suggestions:

Accountancy Europe insists EFRAG should not run a mechanical “deletion” exercise but should rather aim for decision-useful standards and to remember that the ultimate objective of the CSRD and ESRS as part of the Green Deal is to serve as a catalyst towards more sustainable business models.

The options to reduce the number of “shall” datapoints (DPs):

Other – please specify.

Suggestions:

Accountancy Europe recognises that understandability and usability are challenges of the first wave reports. However, we note that experience with the GHG metrics table in ESRS E1 is positive and suggest EFRAG explores the possibility of providing the quantitative information prescribed in the ESRS in a tabular form. This would improve usability and facilitate digital tagging.

In addition, we suggest EFRAG:

- eliminates duplications between ESRS 2 and topical standards, and
- revisits the concepts of MDRs, and the respective disclosure requirements linked with them, as they often result in repetitions.

On another note, it may be useful to also consider whether to retain all 12 ESRS or merge standards that overlap with each other, such as the social standards.

Please find below our rationale for not selecting the other 2 options part of this question.

Accountancy Europe disagrees with merging datapoints as a way of reducing the granularity of standards. This approach was already applied in the past by EFRAG and it resulted in unclear disclosure requirements which consisted of many objectives but not clearly specified information to meet each objective. In addition, merging datapoints does not result in reduction.

Instead, we suggest EFRAG uses the first ESRS reports as field-testing to understand each disclosure requirement objective's usefulness and the experience in providing information that meets these objectives. Based on this feedback, EFRAG should consider streamlining the standards and clarify exactly what information is needed to meet which objective specifically.

We similarly do not support voluntary disclosures and "may" disclosures in ESRS as they:

- do not fit well with the materiality principle in the ESRS: the company's materiality assessment determines its material impact, risks and opportunities (IRO) and then, the company provides the respective relevant disclosures. Therefore, the sustainability statements should include only material information that is useful to users to understand the company's material IROs.
- overload the sustainability statement: this undermines the overall objective of sustainability reporting, including understandability, a key qualitative characteristic of information.
- are not a practice used by international standards setters: standards, such as the International Sustainability Standards Board (ISSB)'s IFRS S2 Climate-related Disclosures (IFRS S2), usually only consist of "shall" disclosures, as standard setter's role is to develop disclosures expected to meet users' needs in case an IRO is material.
- consist of 24% of all the datapoints in the current ESRS : it is important not to mechanically delete all "may" disclosures but instead consider decision-useful and purposeful information, which may result in the reclassification of those disclosures to mandatory, inclusion as examples, or deletion.

To further reduce datapoints, we suggest removing and reclassifying all disclosures (mandatory and voluntary) from the "Application Requirements" (AR) section, which currently represents approximately 22% of the datapoints. We suggest recategorising this section to:

- if some of the current AR disclosures are decision-useful, they should be moved to the main text of the standards as "shall" disclosures; the rest should be deleted
- retain only elements that ensure consistency in the application of the requirements of the main standards
- move examples and other guidance to guidance that is not adopted as delegated act.
- do not fit well with the materiality principle in the ESRS: the company's materiality assessment determines its material impact, risks and opportunities (IRO) and then, the company provides the respective relevant disclosures. Therefore, the sustainability statements should include only material information that is useful to users to understand the company's material IROs.
- overload the sustainability statement: this undermines the overall objective of sustainability reporting, including understandability, a key qualitative characteristic of information.
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- retain only elements that ensure consistency in the application of the requirements of the main standards
- move examples and other guidance to guidance that is not adopted as delegated act.

The potential overlaps between minimum disclosures requirements (MDRs) on Policies Actions and Targets (PATs) that are located in ESRS 2 and PAT "shall" datapoints located in topical standards:

Please select:

Simplifying MDRs on policies in ESRS 2

Comments

Please select:

Simplifying MDRs on actions in ESRS 2

Comments

Please select:

Merging MDR of ESRS 2 with “shall” PAT datapoints of topical standards

Comments

As noted above, we suggest revisiting the MDRs as they often result in duplications.

Forward-looking information

No comments.

On the other hand, please indicate the most critical and the most useful elements to be retained

Accountancy Europe considers the following the most critical elements to be retained in the ESRS:

- the 4-pillar (TCFD/ISSB) structure of the standards, whereby the disclosure requirements are grouped in (1) governance, (2) strategy, (3) impact, risks and opportunities management and (4) Metrics & Targets
- ESRS elements that are fully aligned to or interoperable with the ISSB and GRI standards
- key elements to the standards such as the qualitative characteristics of information, definition of terms and objectives of standards and disclosure requirements (which can be revised to confirm the objective per se).

2.2. OPTIONAL – If possible, and if not specified already under point 2.1 Please identify the most critical narrative disclosure requirements and/or datapoints that require clarification, and share your suggestions

Please organise your comments and suggestions according to the sequence of the standards (cross-cutting, E topical, S topical, G topical):

Disclosure requirements (DR)

Datapoints (DP)

Comment:

Suggestions:

Accountancy Europe supports a practical approach to this ESRS revision process based on evidence collected from field-testing the ESRS from the first wave of reporting. Therefore, we suggest EFRAG prioritises the feedback received from preparers and users for this question. However, it is always important to ensure that the revised ESRS are fit-for-purpose in providing decision-useful information that serves as a catalyst towards more sustainable business models.

2.3. OPTIONAL If possible, and if not specified already under point 2.1 above, please beyond the need for clarification, identify the 10 most challenging narrative disclosure requirements (DRs) with an indication of the least important or most problematic datapoints (DPs) to prepare and share your suggestions:

Please organise your comments and suggestions according to the sequence of the standards (cross-cutting, E topical, S topical, G topical):

Disclosure requirements (DR)

Datapoints (DP)

Comment on the challenge:

Suggestions:

Accountancy Europe supports a practical approach to this ESRS revision process based on evidence collected from field-testing the ESRS from the first wave of reporting. Therefore, we suggest EFRAG prioritises the feedback received from preparers and users for this question. However, it is always important to ensure that the revised ESRS are fit-for-purpose in providing decision-useful information that serves as a catalyst towards more sustainable business models.

5. (untitled)

PART 3: HOW TO IMPROVE QUANTITATIVE INFORMATION AND EU REGULATION RELATED INFORMATION

Quantitative information (metrics) is in principle comparable (over time and between undertakings). Initial feedback seems to suggest that some required metrics may be too granular and/or not decision useful or may be difficult to prepare (due to difficulty to collect basic data or lack of maturity of the matter).

Furthermore, EU Regulations related information (SFDR, Climate Law, Pillar 3, Benchmark) was included in ESRS Set 1 to facilitate the appropriate flows of information between the various actors, in order to create consistency in reporting. In this context, its relevance with respect to general purpose sustainability reporting was not assessed by EFRAG. Initial feedback seems to suggest that certain datapoints may not meet the criteria to be included in the general-purpose sustainability reporting.

In addition, with respect to Article 8 of the Environmental Taxonomy Regulation 2020/852, it was decided to offer a placeholder in the sustainability statement for the information required under this regulation. In this context, its relevance with respect to general purpose sustainability reporting was not assessed by EFRAG. Initial feedback seems to suggest that this information has increased significantly the volume of information reported in the sustainability statement.

3.1. Please identify the most challenging quantitative DRs/DPs and share your suggestion on how to address the issue, in terms of:

- The relevance (least important, critical)
- The difficulty to prepare
- The need for clarification

Please organise your comments and suggestions according to the sequence of the standards (cross-cutting, E topical, S topical, G topical):

Disclosure requirements (DR)

Datapoints (DP)

Comment on the challenge:

Suggestion:

Accountancy Europe supports a practical approach to this ESRS revision process based on evidence collected from field-testing the ESRS from the first wave of reporting. Therefore, we suggest EFRAG prioritises the feedback received from preparers and users for this question. However, it is always important to ensure that the revised ESRS are fit-for-purpose in providing decision-useful information that serves as a catalyst towards more sustainable business models.

3.2. Do you have suggestions regarding EU regulation related datapoints (DPs)?

Accountancy Europe believes the EC is best placed to run this ESRS consistency check with other EU laws, including considerations on if/how to apply the materiality principles on these datapoints. Therefore, we suggest the EC undertakes this workstream and EFRAG focuses its resources on the other requests for ESRS amendments.

3.3. Do you have suggestions regarding Article 8 of the Environmental Taxonomy Regulation 2020/852 related information and its inclusion in the sustainability statement under a placeholder approach?

6. (untitled)

PART 4: HOW TO ADDRESS THE SIMPLIFICATION OF THE STANDARDS (STRUCTURE AND PRESENTATION) AND THE NEED FOR INTEROPERABILITY

Initial feedback seems to suggest that the current structure and presentation of reporting requirements in the standards may be difficult to understand and use and may have contributed to the inclusion of repetitive and duplicated content within the sustainability statement.

In addition, to avoid unnecessary regulatory fragmentation that could have negative consequences for undertakings operating globally, ESRS Set 1 has been drafted with the objective to contribute to the process of convergence of sustainability reporting standards at global level. The Omnibus proposals suggest to further enhance the already very high degree of interoperability with global sustainability reporting standards.

5.1. Please share your suggestions on how to improve and simplify the current structure and presentation of the standards, in relation to:

Please select:

The relationship between cross-cutting and topical standards

Suggestions:

Please select:

The relationship between the main body of the standards and the application requirements

Suggestions:

As mentioned above, we suggest addressing the overlap between the ESRS 2 requirements and the requirements in the topical standards as well as reconsidering the MDRs.

In addition, we suggest recategorizing the "Application Requirements" (AR) section as follows:

- if some of the current AR disclosures are decision-useful, they should be moved to the main text of the standards as "shall" disclosures; the rest should be deleted
- retain only elements that ensure consistency in the application of the requirements of the main standards
- move examples and other guidance to guidance that is not adopted as delegated act.

Please select:

Any other matter

Suggestions:

A key challenge from the first ESRS reports is the overloaded reports, whereby it has been difficult to understand the company's sustainability performance and what is useful information to users. In addition to the suggestions above on the clarification of key ESRS concepts, we suggest EFRAG considers including in the sustainability statements' format a 'summary table' or a 'core' section, now or in the near future. This would be similar to the experience with financial reporting which start with the 4 primary financial statements and then continue with the notes to those financial statements. It is also a presentation concept we have explored in our Core & More series (<https://shorturl.at/7z2AE>), whereby we proposed the 'core report' would include a summary of the most relevant and material information, and the 'more reports' would include additional detailed information.

As mentioned above, we note that many current ESRS disclosure requirements are a result of the merge of various "old" disclosure requirements following previous reduction exercises when the standards were being developed. This has led to confusion as one disclosure requirement may have many objectives, and a list of information to disclose which is not clear as to which objective they correspond to and whether additional entity-specific information is needed to meet the objective. For example, disclosure requirement S4-1 Policies related to consumers and end-users has 2 objectives, but only one list of information to disclose.

We suggest EFRAG uses the first ESRS reports as field-testing to understand each disclosure requirement objective's usefulness and the experience in providing information that meets these objectives. Based on this feedback, EFRAG should consider streamlining the standards and clarify exactly what information is needed to meet which objective specifically, now or in the near future.

5.2. Regarding interoperability, please:

If you are a preparer, indicate if you are reporting under another framework and which one:

If you are not reporting under another framework, indicate if you intend to do so and use which one:

Please share any suggestion you may have to enhance the already high level of interoperability of ESRS with other frameworks (ISSB, GRI, TCFD, TNFD, CDP). Please indicate DR/DPs if relevant.

If you are a user/other type of stakeholder.

Share your views on the importance and usefulness of interoperability from your perspective:

Accountancy Europe supports both European and international sustainability reporting standards. Since the ESRS were issued, many jurisdictions have also incorporated sustainability reporting in their legal framework, many of them from endorsing the ISSB standards. We support aligned standards as they reduce burdens on the reporting ecosystem (for more, see our contribution ESRS perspectives: interoperability). We call for a set of revised ESRS that does not reduce the level of interoperability with ISSB and GRI.

7. (untitled)

PART 6 – ANY OTHER COMMENT OR SUGGESTION

For instance, among others, in relation to format and presentation of the sustainability statement and its relationship with other parts of the management report, the communication of the company, the reporting boundaries, etc.

Accountancy Europe appreciates that there is a different level of maturity between ESG topics, with climate being the most mature. Therefore, for some topics it may be too early to determine what information is useful or whether it serves its targeted purpose. Indeed, field-testing based on the first ESRS reports may result in some information not being reported or it being difficult to report, but this does not mean that such information is not decision-useful or purposeful. It is always important to ensure that the revised ESRS are fit-for-purpose in providing decision-useful information that serves as a catalyst towards more sustainable business models.

We also note that various formats of guidance have also caused confusion in the market: the ESRS' Application Requirements, EFRAG's Implementation Guidance, EFRAG's Q&A all address various types of application matters. We suggest EFRAG consolidates its approach in providing guidance, which should remain non-binding but would be more orderly.

Finally, we also refer to our recommendations related to the ESRS revision due process to define the "non-negotiables" in the due process, to run a practical and well managed process and to tailor the due processes to the amendments type, see <https://accountancyeurope.eu/wp-content/uploads/2025/04/250409-EFRAG-due-process-statement-Omnibus-ESRS.pdf?v1>

8. Thank You!

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

You will receive a copy of your submitted questionnaire in your email.

The EFRAG Secretariat will anonymise contributions and leverage them only in aggregate form.