

Transparency International UK and Transparency International France Joint Response to:

EFRAG's Public Consultation on The Revised Exposure Draft European Sustainability Reporting Standards (ESRS)

This document presents Transparency International UK's and Transparency International France's response to EFRAG's public consultation as part of the European Commission's simplification initiative (the Omnibus package) which covered, among other legislative areas, the EU Corporate Sustainability Due Diligence Directive, the Corporate Sustainability Reporting Directive and its accompanying ESRS.

This consultation addressed the proposed revised ESRS. It opened in July 2025 and closed on 29 September 2025.

Included in this document are the survey questions forming this consultation and, in blue text, our submitted responses. Where we did not provide a response, we have included "No response submitted".

The full survey is provided online, along with other documents relevant to this EFRAG consultation, at: <https://www.efrag.org/en/projects/esrs-simplification?page=documents>

SEPTEMBER 25, 2025
TRANSPARENCY INTERNATIONAL UK

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 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.

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: [Transparency International UK](#) _____

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]

We welcome the fact that the proposed amendments have retained the Double Materiality Assessment, and we believe that the amendments to the Double Materiality Assessment process strike an acceptable balance between simplification and robustness.

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]

No response submitted.

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]

No response submitted.

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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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

PARTIALLY AGREE/PARTIALLY

DISAGREE NO

[COMMENTS – max 300 words]

We see the merits of standardising General Disclosure Requirements (GDRs) for policies, actions and targets (GDR-PAT) across the topical standards. However, we believe this could lead to reporting companies not disclosing material information in three main instances:

- (1) **deleting Disclosure Requirements (DRs) requiring certain specific datapoints** risks companies omitting material information from their disclosures. For example, deleting DR 10c) requiring companies to provide “details on the establishment of internal whistleblower reporting channels, including whether the undertaking provides for information and training to its own workers and information about the designation and training of staff receiving reports”.
- (2) **deleting DRs on the company’s timetable for implementing a policy where it does not have a policy in place.** For example, DR 10 b) (amended) stated, “where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption, it shall state this and whether it has plans to implement them and the timetable for implementation”. Amended DR 10b (now DR 8) now states, “In addition to the information required by ESRS 2 GDR-P, the undertaking shall disclose: a) the circumstance when it has no policies on anti- corruption or anti-bribery consistent with the United Nations Convention against Corruption”. We find the wording “the circumstance when” to be unclear and recommend amending ESRS 2 paragraph 30 (62 amended) to include the wording “and the timetable for implementation” after “it shall disclose this fact”.
- (3) **lack of requirement for companies to disclose their plans and/or timeline for implementing policies or procedures where these are not in place.**

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]

While it is positive that voluntary disclosures have been retained, the legal status of the NMIG remains unclear. This uncertainty risks limiting its effectiveness within the ESRS, as stakeholders may question the authority of the guidance. Placing voluntary disclosures in a separate document, particularly one whose legal standing is not yet defined, creates a risk that key examples will be overlooked. For example, the guidance in NMIG 1 relating to paragraph 7 (Policies – anti-corruption and bribery) which, provides important information that enables stakeholders to hold companies accountable for their approach to anti-bribery and corruption.

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]

[The lack of a clear legal status of the NMIG within the ESRS framework reduces its authority and risks weakening its role in guiding consistent sustainability reporting.](#)

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]

[No response submitted.](#)

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]

No response submitted.

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 Option 1

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]

No response submitted.

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

No response submitted.

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]

No response submitted.

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]

No response submitted.

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 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), 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	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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

(Amended ESRS E3 paragraph 17)	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]

We welcome the move to make new DR 10 (c) mandatory and the recognition of the importance of training for high-risk teams, such as procurement. Sales and business development teams are all higher risk

Recommendation: Retain wording as included in the amended exposure draft in new DR 10 (c).

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.
E2-4 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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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]

[No response submitted.](#)

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

[COMMENTS – max 300 words]

[No response submitted.](#)

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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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].

No response submitted.

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]

No response submitted.

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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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]

No response submitted.

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]

No response submitted.

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]

No response submitted.

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

No response submitted.

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

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]

No response submitted.

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 [link](#)

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	()	()	()
ESRS 2	()	()	()
ESRS E1	()	()	()
ESRS E2	()	()	()
ESRS E3	()	()	()
ESRS E4	()	()	()
ESRS E5	()	()	()
ESRS S1	()	()	()
ESRS S2	()	()	()

Amended ESRS Exposure Drafts – July 2025 Public Consultation

ESRS S3	()	()	()
ESRS S4	()	()	()
ESRS G1	()	()	()
Glossary	()	()	()

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

No response submitted.

34) Any other comments

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

No DRs on “corporate culture” despite being a G1 Business Conduct sub-topic. A company may not be prompted to disclose material information on how it fosters its corporate culture, and related actions, targets and metrics, by ESRS GDR-P because companies do not tend to have a specific policy on their culture.

Opportunity to reinsert DRs on beneficial ownership. The [April 2022 exposure draft G2 Business Conduct](#) at DR G2-8 stated: “43. The undertaking shall provide information about its beneficial owners (as defined in article 3(6) of Directive (EU) 2015/849) and control structure. 44. The principle to be followed under this disclosure requirement is to provide transparency on the individuals who ultimately own or control the undertaking’s organisational and control structure, including beneficial owners. 45. The disclosure required by paragraph 43 shall include information on the identity of who the ultimate beneficial owners or those who control the undertaking are, together with their respective ownership or control percentages.” This DR was removed from the [November 2022 exposure draft](#) because, “the EFRAG considered the information to be superfluous in the context of beneficial ownership registers in the EU and a tenuous link to bribery/corruption.” As included in the [due process note](#). However, a ruling of the Court of Justice of the European Union (CJEU) on 22 November 2022 annulled provisions in the 5th Anti-Money Laundering Directive requiring public access to beneficial ownership information. This means that DR G2-8 is no longer superfluous and is indeed [critical for understanding corruption and bribery](#) related IROs and performance.

We would like to note that this submission is supported by Transparency International France and Transparency International UK.

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

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	()	()	()	()	()

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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

Amended ESRS Exposure Drafts – July 2025 Public Consultation

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:

ESRS ED 2025 Chapter or Disclosure Requirement	Paragraph	Do you agree?	Comments/Suggestion	Validation
				Please select a chapter or DR or the Exposure Draft
				Please select a chapter or DR or the Exposure Draft
				Please select a chapter or DR or the Exposure Draft
				Please select a chapter or DR or the Exposure Draft
				Please select a chapter or DR or the Exposure Draft
				Please select a chapter or DR or the Exposure Draft

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.**

Amended ESRS Exposure Drafts – July 2025 Public Consultation

Transparency International detailed comments

<p>This template is to be used to provide comments to specific paragraphs of the Amended ESRS 2025 Exposure Draft (ED). <u>Only column A to F should be changed.</u> The filled in file can be uploaded as part of the Survey on Section 3 of the Public Survey:</p> <p>In this section – which is optional - you can select to provide your opinion on the level of simplification achieved for one or more Disclosure Requirement (DR) or Chapter in case of ESRS 1 and to provide your comments on the corresponding paragraphs of the 12 EDs.</p> <p>Do you agree that the proposed Amended ESRS strike an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?</p> <p>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. Please start selecting the chapter or DR you would like to comment on and afterwards the paragraph. After having selected the paragraph you could comment at paragraph level [MAX 200 words comments].</p>					
ESRS ED 2025 Chapter or Disclosure Requirement	Paragraph	Do you agree?	Comments/Suggestion	Validation	Word count
G1 - Objective	ESRS G1 - 4. (c)	I agree	Amending Disclosure Requirement 2c (in the adopted ESRS G1 Business conduct 2023), now Disclosure Requirement 4c in the exposure draft, to streamline wording to “political influence and lobbying activities” is a positive change, as it clarifies the focus of the disclosure requirement. Recommendation: Retain wording as included in the amended exposure draft.	Ok	52
G1-1 - Policies related to business conduct	ESRS G1 - 7.	I disagree	Deleting “how it fosters its corporate culture” from Disclosure Requirement 7 in the Exposure Draft 2025 (removes the only Disclosure Requirement on “corporate culture” despite this being an ESRS G1 sub-topic (see “Objective” paragraph 2). Stakeholders need to know how companies foster good corporate culture, which underpins responsible business conduct. Recommendation: (1) retain the original wording in Disclosure Requirement 7 (in the adopted ESRS G Business Conduct 2023) and (2) clarify in ESRS 2 how reporting companies should disclose information on material topics or sub-topics where there is not a specific policy in place.	Ok	93
G1-1 - Policies related to business conduct	ESRS G1 - 7.	I disagree	We understand the rationale for deleting Disclosure Requirement 9 (in the adopted ESRS G1 Business Conduct 2023). We do not believe Disclosure Requirement 7 in the Exposure Draft 2025, sufficiently covers this information. In our experience, companies are unlikely to have a specific company policy on “company culture” and therefore may not be prompted to disclose material information if referring to ESRS GDR-P alone. Recommendation: (1) retain the original wording in Disclosure Requirement 9 (in the adopted ESRS G Business Conduct 2023)	Ok	82

Amended ESRS Exposure Drafts – July 2025 Public Consultation

G1-1 - Policies related to business conduct	ESRS G1 - 8. (a)	I disagree	<p>Amending Disclosure Requirement 8a in the Exposure Draft 2025 to remove the reference to “whether it has plans to implement them and the timetable for implementation” is concerning because stakeholders need to understand a company’s timetable for implementing critical company policies where not in place.</p> <p>Recommendation: (1) retain the original wording in Disclosure Requirement 10 b (in the adopted ESRS G1 Business conduct 2023) (2) and/or amend ESRS 2 para. 30 (62 amended) to require companies to disclose the timeline for implementation where they do not have the policy in place.</p>	Ok	90
G1-1 - Policies related to business conduct	ESRS G1 - 8. (a)	I disagree	<p>The protection of whistleblowers is a G1 Business conduct sub-topic and, therefore, ESRS 2 GDR-PAT disclosures apply. Given the sub-topic's importance, we are, however, concerned that deleting the Disclosure Requirement 10c i. (in the adopted ESRS G1 Business conduct 2023) (whether the company provides training whistleblower reporting channels and to staff receiving reports) and 10 c ii. in the adopted ESRS G1 Business conduct 2023 (measures to protect workers against retaliation) means that companies may omit to report material information. Transparency International’s research shows that 19 EU countries do not comply fully with the EU Whistleblower Protection Directive (link https://www.transparency.org/en/publications/how-well-do-eu-countries-protect-whistleblowers-speakup) and, therefore, specific DRs on companies’ actions to operationalise their whistleblowing channel and protect whistleblowers from retaliation are critical to ensure companies are supporting and encouraging workers to raise concerns.</p> <p>Recommendation: (1) retain the original wording in Disclosure Requirement 10 (c) i. and ii. (in the adopted ESRS G1 Business Conduct 2023), and/or (2) include ARs that set out what companies should disclose on whistleblowing channels and whistleblower protection from retaliation.</p>	Ok	170
G1-1 - Policies related to business conduct	ESRS G1 - 8. (b)	I disagree	<p>Amending Disclosure Requirement 8b in the Exposure Draft 2025 to remove the reference to “whether it has plans to implement them and the timetable for implementation” is concerning because it is unclear whether this information would be required through GDR-PAT as the company does not already have a policy in place. Stakeholders need to understand a company’s timetable for implementing critical company policies if they are not already in place. Protecting whistleblowers is critical for encouraging workers and third parties to raise concerns.</p> <p>Recommendation: (1) retain original Disclosure Requirement 10 d)(in the adopted ESRS G1 Business Conduct 2023) (2) and/or amend ESRS 2 paragraph</p>	Ok	126

Amended ESRS Exposure Drafts – July 2025 Public Consultation

			30. (62 amended) to require companies to disclose the timeline for implementation where they do not have a policy in place.		
G1-1 - Policies related to business conduct	ESRS G1 - 8. (b)	I disagree	We acknowledge that EFRAG have kept the protection of whistleblowers as part of the sub-topics in G1 Business conduct, and because of this, the ESRS 2 GDR-PAT applies, which we welcome. However, the deletion of 10 e (in the adopted ESRS G1 Business conduct 2023) removes the requirement for companies to disclose whether the company has the procedures in place to investigate incidents and whistleblower reports promptly, independently, and objectively. This aspect may be overlooked by reporting companies without a specific reference in the topic disclosures. Stakeholders need to know that companies have the appropriate procedures in place to act on whistleblower reports to ensure both internal and external trust in the company. Recommendation: (1) retain original Disclosure Requirement 10 e) wording (in the adopted ESRS G1 Business conduct 2023), or (2) include ARs that set out what companies should disclose on their procedures for investigating reports by whistleblowers promptly, independently and objectively.	Ok	152
G1-2 - Actions related to business conduct	ESRS G1 - 10. (b)	I disagree	Deleting Disclosure Requirement 18 b (in the adopted ESRS G1 Business Conduct 2023) on whether the reporting company separates investigators or the investigating committee from management during investigations would remove material information on the company's anti-corruption and anti-bribery IROs. The independence of investigators from the team under investigation is crucial for ensuring an impartial investigation and to remove conflicts of interest. Recommendation: 1) retain Disclosure Requirement 18 (b) wording (in the adopted ESRS G1 Business conduct), or (2) include ARs that set out what companies disclose in reference to anti-corruption and anti-bribery investigations.	Ok	93

Amended ESRS Exposure Drafts – July 2025 Public Consultation

G1-2 - Actions related to business conduct	ESRS G1 - 10. (b)	I disagree	Deleting Disclosure Requirement 18 c (in the adopted ESRS G1 Business conduct 2023), means the company may omit explaining how it ensures findings from investigations, and outcomes, are reported upwards to senior leadership, which is essential if findings are to be acted upon and inform remediation. Recommendation: 1) retain Disclosure Requirement 18 (c) (in the adopted ESRS G1 Business conduct) wording, or (2) include ARs that set out what companies should disclose in reference to the procedures for reporting the outcomes of investigations.	Ok	82
G1-2 - Actions related to business conduct	ESRS G1 - 10. (b)	I disagree	Deleting Disclosure Requirement 19 (in the adopted ESRS G1 Business Conduct 2023) removes the requirement to disclose plans to adopt procedures to prevent, detect, and address allegations or incidents of corruption and bribery. It is unclear how the ESRS 2 GDR-PAT architecture applies where there is no policy and/or procedure in place. Recommendation: Amend ESRS 2 paragraph 30. (62 amended) to require companies to disclose their plans and timeline for implementing policies or procedures where these are not in place.	Ok	78
G1-2 - Actions related to business conduct	ESRS G1 - 10. (b)	I disagree	Amending Disclosure Requirement 20 (in the adopted ESRS G1 Business conduct 2023) from a mandatory to voluntary disclosure (to be included in the Non-Mandatory Illustrative Guidance) weakens this Disclosure Requirement.. Stakeholders need to know that companies are communicating their policy commitments in an accessible way and to check that commitments are understood. Recommendation: (1) retain original wording from Disclosure Requirement 20 (in the adopted ESRS G1 Business conduct 2023), or (2) include ARs that reference what companies should disclose in reference to the communication of anti-bribery and anti-corruption policies.	Ok	88
G1-2 - Actions related to business conduct	ESRS G1 - 10. (c)	I agree	We welcome the move to make new Disclosure Requirement 10 c mandatory and the recognition of the importance of training for high-risk teams, such as procurement. Sales and business development teams are all higher risk Recommendation: Retain wording as included in the amended Exposure Draft 2025 in new Disclosure Requirement 10 c.	Ok	51

Amended ESRS Exposure Drafts – July 2025 Public Consultation

G1-4 - Metrics related to Incidents of corruption or bribery	ESRS G1 - 14.	I agree	We welcome the amendment to make the new Disclosure Requirement 14 mandatory and appreciate that EFRAG recognised the gap that would have resulted from deleting DR 22. Without this change, there would have been no mandatory Disclosure Requirements on confirmed incidents. It is essential that at least one DR addresses confirmed incidents. Recommendation: Retain wording included in the amended Exposure Draft 2025 in new DR 14.	Ok	65
G1-4 - Metrics related to Incidents of corruption or bribery	ESRS G1 - 14.	I disagree	We are concerned that moving Disclosure Requirement 25 b), 25c) and 25 d) (in the adopted ESRS G1 Business Conduct 2023) to the NMIG may lead to these Disclosure Requirements being overlooked. Stakeholders need to have transparency on the action taken by companies on corruption incidents. While we recognise that these Disclosure Requirements were voluntary in ESRS G1 Business conduct, as Disclosure Requirement 25 (a) (in the adopted ESRS G1 Business conduct 2023) now Disclosure requirement 14 has been moved to mandatory content in the amended Exposure Draft 2025, we see this as an opportunity to consider moving Disclosure Requirements 25 b), 25 c), and 25 d) (in the adopted ESRS G 1 Business conduct 2023) to mandatory. Recommendation: (1) Review Disclosure Requirements 25 (b), 25 (c), and 25 (d) and consider including in mandatory content. (2) and/or include application requirements for amended DR 14 to include information relating to corrective actions.	Ok	152
G1-5 - Metrics related to political influence and lobbying activities	ESRS G1 - 16.	I agree	We welcome the amendment to Disclosure Requirement 16 as it has provided clarity to the disclosure by creating a distinction between DPs for political influence and lobbying activities.	Ok	28
G1-5 - Metrics related to political influence and lobbying activities	ESRS G1 - 17.	I agree	We welcome the amendment to Disclosure Requirement 17 as it has provided clarity to the disclosure by creating a distinction between DPs for political influence and lobbying activities.	Ok	28
G1-5 - Metrics related to political influence and lobbying activities	ESRS G1 - 17.	I disagree	We think that deleting Disclosure Requirement 10 d) (in the adopted ESRS G1 Business conduct) will make it more difficult to easily cross-reference information included in the relevant transparency registers. We do not believe this would be onerous information to disclose. Recommendation: 1) retain original wording in the adopted ESRS G1 Business conduct 2023 wording, 2) and/or include information previously included in an application requirement for new DR 17.	Ok	67