

Appendix 1: *ESRS 2 results and assessment of the consultation comments*

**Q1: Please, rate to what extent do you think DR 2-GR 1
– General characteristics of the sustainability reporting
of the undertaking**

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1			not in set 1	set 2	no
2. More AG to be developed in the future					
3. Specific wording comments: Remove "where applicable" in paragraph 5 (d); Remove references to EU legislation still in development and to acts and plans which are not legislation; Define/better align "business card" (name of section 1)	wording	No	delete.	wording to be adapted	no
4. Due diligence: to be in line with the last version of the CSRD	Due diligence	No	already identified in ERS1	to be aligned	Due diligence
5. Architecture: more alignment with TCFD and ISSB needed	ISSB and TCFD alignment	yes - T1	already raised in ERS1. Text already aligned	wording to be aligned, additions to be assessed in light of EU law/ambitions/double materiality	ISSB alignment for ERS 2
6. Align the text with the final CSRD: e.g., only one presentation option	CSRD	yes - DG2	already identified in ERS1	to be aligned	CSRD alignment
7. Need to prioritize material information, in order to provide added value and reduce costs	Materiality	no	Simplify wording, eliminate redundancies and see if additional guidance are needed		Simplification issue paper
8. Better align with ISSB on the core elements of their proposals (architecture, reporting boundaries, terminology, materiality assessment)	ISSB and TCFD alignment	no			ISSB alignment for ERS 2

**Q1: Please, rate to what extent do you think DR 2-GR 1
– General characteristics of the sustainability reporting
of the undertaking**

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
9. An integrated reporting option should be allowed	integrated reporting	no	incompatible with the CSRD	no action	no
10. Consider flexibility to integrate upcoming EU legislation introducing new sustainability reporting requirements. No need to double report but cross-referencing instead.	Structure	no	This comment is asking to limit the references to actual regulation (not future EU regulation). An appendix with illustration of how regulation references in art. 29 of the CSRD are incorporated is being prepared as required by the CSRD.	to be aligned (appendix with the references incl. regulation)	no
11. Create a general overview and hierarchy of applicable regulations, to facilitate the application in disclosures and simplifying the standards update process.	Structure	no	This comment is asking to limit the references to actual regulation (not future EU regulation). An appendix with illustration of how regulation references in art. 29 of the CSRD are incorporated is being prepared as required by the CSRD.	to be aligned (appendix with the references incl. regulation)	no
12. Additional burden and significant lack in reporting competence in the implementation of the standards at company, consultancy and auditor level.	Additional burden	No	this is already allowed in the standard	No action	no
13. Risk of checklist by being too prescriptive in the reporting requirements	Wording issue	no	Simplify wording, eliminate redundancies	to be aligned	no
14. Consistency between financial and non financial: clarification in scope	CSRD	not an issue	done through connectivity exercise	no action	no

**Q2: Please, rate to what extent do you think
DR 2-GR 2 – Sector(s) of activity**

n.	Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1.	Out of scope of Set 1	digitisation		part of set2	no action	no
2.	More AG to be developed in the future					
3.	Specific wording comments: Avoid using "significant" and "material" interchangeably as this creates confusion; "Market" and "customer group" are not defined (Appendix 6); Reporting on «significant internal transactions » will be difficult to implement (AG5); There is no definition of the concept of "internal transactions" (GEN).	wording	No	Not appropriate to have a definition for for 'market' and 'customer group' as they need to be entity-specific. Definition of 'internal transactions' to be included. Need to clarify use of "material" and "significant".	to be aligned (as described in the comments)	no
4.	Information requirements and AG are too granular and extensive	granularity	Yes - T3	This comment suggests to reduce granularity of AG2/AG12 and par. 12 b, c and d. AG6 is commercially sensitive (simplification to be considered). Role of IFRS 8 in AG 7 and AG 11 seems different (to be clarified). AG 12 could be moved to SEC 1 (disagree as this part of the general description of the business model). Breakdown by headcount and country excessive (disagree, as breakdown of HC by country is necessary in order to understand impact profile incl. for social issues). Sector breakdown should be IFRS 8 and not NACE (disagree as NACE is the link to sector specific standards and IFRS 8 doesn't foster comparability and doesn't support information about impact profile as NACE does). The details provided by country/sector/market is supported by comments from civil society as necessary to understand impact profile.	to be aligned (as described in the comments)	no
5.	Need to prioritize material information, in order to provide added value and reduce costs	missing	No	simplification will be put in place	to be aligned	no
6.	Better align with ISSB and avoid duplication	ISSB alignment	No			ISSB alignment for ERS 2
7.	Eliminate the term 'significant' (DR 2-GR2 and AG) and state clearly that the information disclosed must be comprehensive and not omit anything that is relevant from a double materiality perspective	more guidance needed on materiality	yes - T3	This comment focuses on significant sectors and countries: definition of significant omits elements of impact materiality as it is defined in financial terms (agree, need to consider also impacts when defining significant). Replace country with jurisdiction (agree). Eliminate significant (disagree as we need a materiality filter.	to be aligned (as described in the comments)	no
8.	EFRAG hasn't yet considered in a final stage the digital guidance on the disclosure requirements.	digitisation		set2	no action	
9.	The current preferred requirement to have all ESRS disclosures in one section is not in line with principles of integrated reporting.	integrated reporting	No	CSRD has decided on one single section.	no action	no
10.	sectoral information must not omit anything that is relevant from a double materiality perspective	GEN	No	set2	no action	no

**Q2: Please, rate to what extent do you think
DR 2-GR 2 – Sector(s) of activity**

n.	Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
11.	Need for non-rebuttable presumption for all SFDR-relevant data points.	GEN	No	ESRS 2 is already mandatory in all cases. To be considered after general direction on Approach to materiality	to be considered	Approach to materiality
12.	The classification of sectors should be done using NACE classification	GEN	No	Comments are split: some oppose the use of NACE codes (and support IFRS 8), others support NACE codes.	no action	no
13.	AG5's requirements (i) and (ii) may result in disclosure of sensitive information	GEN	No	The comment criticises AG 5 (description of intercompany transactions) for being commercially sensitive. Disagree that this should be eliminated, as intercompany are essential to appreciate impact profile.	no action	no
14.	Concerns on granularity, information not being necessarily relevant, plus additional requirements in AG2-AG12 being excessive and too detailed	connectivity	No	Incorporation by reference should be possible from financial statements (agree and it is already like that in the ED), but scope differs (disagree as this referred to the group not the value chain). Missing definition of internal transaction, market and customer group (disagree, we cannot provide definition of market or customer group as they need to be entity-specific). Agree that we can mention examples of internal transactions. Need to add 'any revenue' in 12 a, b and c (disagree: no need to qualify 'any').	to be aligned (as described in the comments)	no
15.	Do not duplicate information already disclosed in financial statements, instead allow incorporating information required by reference	connectivity	No	Duplication of information in §12 Alignment on headcount as used in IFRS	Incorporation by reference avoids duplications in par. 12. Headcount to be aligned.	no
16.	Clarify definitions, e.g. "significant markets" and "significant customer groups"	definition	No	Missing definition of headcount: employees? It should be FTE and not headcount. Agree that consistency with financial statement is needed.	to be aligned (as described in the comments)	no
Addition from external consultant coding Consistency of description of activities Reconsider relevance of AG						

Q3: Please, rate to what extent do you think DR 2-GR 3 – Key features of the value chain

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation, sector specific standards.		Not part of set 1.		
2. More AG to be developed in the future	Value Chain	No.	Phasing in approach needed. First entities to be controlled. Later value chain.	CSRD allows phasing in on value chain information (Art. 19a, 3). Change wording.	Issue paper on Value Chain
3. needs to clarify value chain /process	More AG in future sets but clarification of value chain in Set 1 already.	yes	Value chain	to be aligned	Issue paper on Value Chain
4. Exemptions for subsidiary undertakings from direct reporting obligations when they are included in the consolidated management report (IRO)	New text of the CSRD and high level indicators are being added in ERS 1.	yes	Subsidiary exemption	to be aligned	Subsidiary exemption
5. Provide practical examples in AG for the collection and verifiability of information from counterparties (use of approximations)	definition of value chain	No.	Need for guidance, except phasing in is decided.	to be aligned	Issue paper on Value Chain
6. Need for reconciliation with ISSB/TCFD etc.	ISSB reconciliation	Yes.		to ba	ISSB issue paper
7. Align the principle in pa.15 (which describes the value chain by providing an overview of the processes within a company) with Integrated Reporting Framework	integrated reporting	No.	incompatible with CRSD	no action	no
8. Wording/definition comments: Define "key" elements (pa.16), Clarify "objective" (pa.17), More guidance for "value chain" definition and perspective	wording (key)	Yes, but not all - DG7	Further clarification is needed regarding the breakdown on entity level and end-user-levels. Definitions of "Key"	draft to be amended	
9. Granularity/complexity/relevance of information	Merge of DR2-GR3, DR2-GR4, DR2-SBM 1 and confidentiality of AG14	Yes in regards to merging - T1 No in regards to quality.	Merge of DRs and GR ok.	to be aligned	simplification issue paper
10. Digitalisation should be carefully considered. Promote a machine-readable format and consider adding metadata to contextualise information that will be available through digital reporting.	digitisation		Set 2.	no action	
11. Avoid/Delete AG that requires disclosing confidential information (AG14)	AG14 confidentiality : to be deleted?	No-	to be discussed	to be discussed	
12. Reference to financial reporting / Some requirements are already in financial reporting		Yes.			
13. Specificities of financial undertakings (clarification of extent of the value chain, additional sector-specific disclosure requirements)	Financial companies to provide certain sustainability-related information		Set 2.	no action	

Q3: Please, rate to what extent do you think DR 2-GR 3 – Key features of the value chain

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
14. Alignment with CSRD	CSRD alignment	No	alignment planned with the final CSRD. Already identified in ERS1	draft to be amended	
15. Quality of reported data will in most cases not pass the audit by an independent auditor	auditability	No.	Auditability should be assessed by auditors. And auditors didn't raise this point	no action	no
16. DR should not be rebuttable	Rebuttable presumption	No		see under Q2.	Materiality Issue paper
Addition from external consultant coding					
Clarification on value chain definition, scope and description needs					
Restrict the value chain scope and limit the description requirements					
Phase-in for financial undertakings					

Q4: Please, rate to what extent do you think DR 2-GR 4 – Key drivers of the value creation

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation, sme		set2	no action for set 1.	
2. More AG to be developed in the future					
3. Wording/definition comments: Use a simpler language, Refrain from using other terms than “material” or define “key” (“key elements”), Align definition of “value creation” or provide more guidance, Definition of stakeholders is too broad	Clarification needed : DR2-GR4 useful?	No.	Definition of stakeholders is aligned with CSRD so we cannot have it narrowed down. Value chain, refer to the paper. Ok to replace 'key' with 'material' but need to be consistent across all the standards.	to be aligned ('key')	Value chain issue paper
4. Alignment with ISSB	ISSB alignment	Yes.		to be aligned (unless technically justified by EU ambitions/double materiality)	ISSB issue paper
5. value creation process	Value creation	No.	This comment is asking: rephrasing this DR to the ESG drivers that impact a company's value creation, how these are integrated in the business model and how these play out in terms of outputs and impacts – for the company and for its key stakeholders identified. Agreed. They also suggest to make IR Framework optional. It is indirectly applicable via paragraph 154 of ERS 1 so no need to refer specifically to IR Framework.	draft to be aligned	no
6. Need for simplification and less level of detail	Simplification of language.	No.	simplification of wording	to be aligned	Simplification issue paper
7. merge/or remove DR	DR2-GR3, DR2-GR4 and DR2-SBM 1	Yes - T1	to be considered for simplification	to be aligned	Simplification issue paper
8. audibility	auditability	No.	This comment relates to definition of stakeholders (too broad). See above, definition comes from the CSRD and cannot be changed.	no action	no
9. removal of rebuttable presumption	rebuttable presumption	No.	to be discussed	to be discussed	Materiality issue paper
<p>Addition from external consultant coding DR2-GR4 could equally part of the financial reporting</p>					

Q5: Please, rate to what extent do you think DR 2-GR 5 – Using approximations on the disclosure in relation to boundary and value chain

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation		set2	no action	
2. More AG to be developed in the future					
3. Pros and cons of using estimations/approximations	Clarification	No	Proposal for all the DR GR from 1 to 10: eliminate from ESRS 1 the equivalent concept, incorporate in ESRS 2 corresponding DR any eventual missing elements in the concepts. This will simplify ESRS 1. Also, merge from GR 5 to GR9 in only one GR.	to be aligned	No
4. Too complex/complicated (e.g. inclusion of entities under the proportional consolidation method; how to include qualitative information proportionally)	Clarification	No.	The Principle in ESRS 1 is that entities are accounted in the sust. statements in the same way they are in the financial statements for connectivity, reliability and cost considerations. If they are accounted for at equity, they stay accounted at equity also in sust. statements. Clarification needed in par. 63 'entities accounted for IN FINANCIAL STATEMENTS'.	no action	No
5. ISSB/GRI alignment	ISSB alignment	No	to be aligned (subject to double materiality/EU ambitions)	to be aligned	ISSB alignment / GRI alignment
6. Need for more guidance (e.g. on the conditions, criteria, applicability of approximations)	More guidance needed	No.	Provide guidance in App. G.		no
7. DR 2-GR 5 and DR 2- GR 6 should be merged	Merge of GR 5 and GR 6	No	-Proposal for all the DR GR from 1 to 10: eliminate from ESRS 1 the equivalent concept, incorporate in ESRS 2 corresponding DR any eventual missing elements in the concepts. This will simplify ESRS 1. Also, merge from GR 5 to GR9 in only one GR.	to be aligned	No
8. Quality of reported data will in most cases not pass the audit by an independent auditor	auditability	No	Point not raised by auditors	no action	no
9. DR should be removed and replaced by a disclosure principle	DR 5 in ESRS 1 ?	No.	-Proposal for all the DR GR from 1 to 10: eliminate from ESRS 1 the equivalent concept, incorporate in ESRS 2 corresponding DR any eventual missing elements in the concepts. This will simplify ESRS 1. Also, merge from GR 5 to GR9 in only one GR.	to be aligned	No

Addition from external consultant coding
Alignment with CSDDD and UNGP guidelines
GR6 to be included in ESRS1

Q5: Please, rate to what extent do you think DR 2-GR 5 – Using approximations on the disclosure in relation to boundary and value chain

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
------------	--	--	----------------------------	---	--

DR under § 24b) should be included in the description of risks

Q6: Please, rate to what extent do you think DR 2-GR 6 – Disclosing on significant estimation uncertainty

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation		set 2	no action	
2. More AG to be developed in the future	guidance needed	Yes.	set 2	no action	Issue paper on principle (time horizon)
3. Metric of risk should belong in the general risk description	wording	No	Simplify the wording of the DR	to be aligned	no
4. Quantitative information should be preferred to qualitative one	wording	No	This principle is currently aligned with IFRS S1 par. 83.	no action	no
5. Need for consistency of financial data between in Sust.Report and Financial Reporting	Alignment with IFRS S1	Yes	Already covered in ESR S1 par. 137/140	no action	no
6. Proxies/estimation not allowed under Art. 8, Delegated Act of the Taxonomy Regulation	Missing	No	Proposal to replace 'approximation' with estimation using secondary data (market/sector/peers data).	to be aligned	Value chain
7. Merge DR 2-GR 5 and DR 2-GR 6	Wording and more guidance	No	See above		
8. Undertakings should disclose the inputs and methodology used to arrive at estimates.	Missing	No	agreed	to be aligned	no
9. Concept of materiality should limit the level of detail	granularity of materiality	Yes - G3	DR limited to 'significant' estimation uncertainty + already aligned with IFRS	no action	no
10. Disclose lack of data	Wording and more guidance	No	This concept is already used in financial reporting + aligned with IFRS S1	no action	no
11. Application Guidance should specify the methodology and assumptions needed for approximations of information on value chain	more guidance needed	No	More guidance in future sets of standards.	no action	no

Addition from external consultant coding

GR6 to be included in ESR S1
DR under § 24b) should be included in the description of risks
More alignment with IFRS
provision of a list of sources to estimate IROs

Q7: Please, rate to what extent do you think DR 2-GR 7 – Changes in preparation and presentation

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation		set 2	no action	
2. More AG to be developed in the future					
3. Combine ESRS 1 and ESRS 2 / Replace DR with a disclosure principle in ESRS 1	Merge ESRS1 &2	No	Move from ESRS 1 to ESRS 2 the principles underpinning the GRS and merge GR as proposed in previous points. ESRS 1 should stay as concepts and principles need to be separate from discoscure requirements.	no action (but merge content related to GR from ESRS 1 to ESRS 2).	no
4. Limit the obligation of re-stating information	limit restatement	No	Proposal to require only explanations and not restatement for value chain; restatement only for financial reporting perimeter.	to be aligned	value chain
5. name reason for change	wording	No.	25 d: change to the wording d) to "if impracticable or too onerous" (allow to omit restatement if too onerous).	to be aligned	no
Addition from external consultant coding					
Restatement should not be mandatory					
Communicate reason for restatement	already in the ED				

Q8: Please, rate to what extent do you think DR 2-GR 8 – Prior period errors

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation		set 2	no action	
2. More AG to be developed in the future					
3. Align with ISSB S1	Missing (adjusted events)	Yes	To be aligned (par. 71 of ERS S1)	To be aligned	no
4. Replace DR with a disclosure principle in ERS 1	principle to be in ERS1	No.	See proposal in previous questions	To be aligned	no
5. This information should not be required centrally	availability of information	No.	This DR requires to present information for errors, but does not mandate the location (central rather than next to each datapoint).	no action	no
6. events after reporting date					
7. Clarification on wording that only "material" errors should be corrected	Clarification that only "material" errors should be corrected.	No.	Agree (also to align with IFRS par. 84)	To be aligned	no
Addition from external consultant coding Remove this DR to be more aligned with ISSB Combine ERS1 &2					

Q9: Please, rate to what extent do you think DR 2-GR 9 – On other sustainability reporting pronouncements

n.	Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1.	Out of scope of Set 1					
2.	More AG to be developed in the future	digitalisation		set 2	no action	
3.	DR 2-GR 9 should be voluntary	references to other sustainability standards	no	This DR is applicable only when other standards are used voluntarily on top of ESRS. It is not creating additional burden.	No action	no
4.	Definition/clarity needed (e.g. what 'generally accepted' is; definition of 'pronouncement'; what exactly needs to be disclosed)	Wording (generally accepted)	No.	Wording to be refined	to be aligned	no
5.	reference	Nature of the DR: voluntary?	No.	This DR is applicable only when other standards are used voluntarily on top of ESRS. It is not creating additional burden.	No action	no
6.	Encourage to disclose related data	alignment	No.	Agree: when the voluntary information is presented in ESRS statements next to ESRS disclosure, companies should identify separately this information, explain whether whether they meet ESRS quality criteria and explain why the company has decided to report on them.	to be aligned	No
7.	Clarify that it does not extend the audit procedures to other sustainability reporting pronouncements	auditability	No.	ESRS cannot mandate audit requirements. The proposal to separately identify this additional voluntary information will help to distinguish between the two sets of info. In the BC to be explained that the inclusion of this info doesnt imply that the undertaking has assessed compliance with these other frameworks/standards.	no action	no
8.	Not within CSRD/compliance document/declutter	other EU regulations	No.	Agree: when the voluntary information is presented in ESRS statements next to ESRS disclosure, companies should identify separately this information, explain whether whether they meet ESRS quality criteria and explain why the company has decided to report on them.	No action	no

Q9: Please, rate to what extent do you think DR 2-GR 9 – On other sustainability reporting pronouncements

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
Addition from external consultant coding					
encourage explaining additional disclosures					
Clear alignment with other standards					
Remain voluntary					

Q10: Please, rate to what extent do you think DR2-GR 10 – General statement of compliance

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation.		set 2	no action	
2. More AG to be developed in the future					
3. Exemption for subsidiaries when sustainability reporting is done at group level.	Structure	Yes - T1	Simplify 30b and transfer AG 22 and AG23 to para. 30.	to be aligned	No
4. Too granular and not relevant (e.g. pa. 30 (b)(i))	Scope	Yes - T1	Simplify and eliminate 30 b i	to be aligned	No
5. Remove 30b, delete AG23	Relevance of § 30b (i)	Yes - T1	AG 23 duplicates IRO, delete	to be aligned	No
6. A statement of non-compliance is missing (e.g. due to transitional exception rules or because disclosure may be considered as being voluntary)	Missing (see e.g. ESRS 1 para. 93 "decides to disclose").	No	Par. 93: when an undertaking has a policy it discloses it. No need for a non-compliance statement.	no action	no
Addition from external consultant coding Suppress or delete some parts of the requirement					

Q11: Please, rate to what extent do you think DR 2-SBM 1 – Overview of strategy and business model

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	Comment on digitalisation.		set2	no action	
2. More AG to be developed in the future					
3. part of general business strategy and double work	Wording	Yes. There is no CSRD requirement that a company should have a sustainability strategy.	Simplify the AG. Par. 35 c) to be modified 'a description of whether and to what extent sustainability matters are reflected in the undertakings business model and strategy and its mission, vision, purpose, and values.	to be aligned	no
4. AG24, 25 challenging	Clarification of definitions	Yes, AG 24, AG 25.	Clarify value for all stakeholders VS enterprise value creation. Also, AG 25 (e) clarify inputs and relationship with sustainability.	to be aligned	no
5. alignment with ISSB	Alignment with ISSB	No.	Alignment of definitions and terms needed (however need to cover here also value created for stakeholders other than investors).	to be aligned	no
6. further requirements in AG/definitions	Missing § AG25(f) of the DR 2-SBM 1 duplication with DR 2-GR 4	Yes	Delete due to duplication / merge GR 3, GR 4 and SBM 1	to be aligned	no
7. too granular/not relevant	granularity	Yes, AG 24, AG 25.	see above + wording to be simplified	to be aligned	no
8. Merge DR2-GR3, DR2-GR4 and DR2-SBM 1	Merge DR2-GR3, DR2-GR4 and DR2-SBM 1	yes; TEG feedback.	agreed	Draft to be amended.	no
9. exemption for sensitive information	Confidentiality	No.	Already in CSRD 19a) point 3	no action	no
10. delete 35a, mission, vision,purpose	Wording (related to mission, vision, purpose)	No.	Mission, purpose, vision. value are commonly used. No need to define them.	no action	no
Addition from external consultant coding					
Allow for pictorial format					
Clarify definitions: inputs, outputs and outcomes, business model vs strategy, stakeholders					

Q12: Please, rate to what extent do you think DR 2-SBM 2 – Views, interests and expectations of stakeholders

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	Digitalisation.		set 2		
2. More AG to be developed in the future	Guidance		set 2		
3. too detailed/fragmented	Reorganisation needed	No.	Usefulness to AG 30 c) and 38 a), b) to be considered/ Simplification needed. Agreed to simplify, however this DR covers stakeholders engagement and a central disclosure across all topics is necessary.	to be aligned	no
4. focus on how organized and used	Stakeholder engagement	Yes. G5	Refocus this DR on methodology and results: how stakeholder engagement is organized and how it is being used – based on the individual needs (and impacts) of different organizations.	to be aligned	no
5. duplication DR 2-sbm 1 and 2	Merge SBM1 & SBM2	No.	Reorganisation in one DR in order to eliminate duplication. See also comment n° 7 in Q4 and 9 in Q3 related to the merge of DR3, DR4 and SBM1	to be aligned	Simplification issue paper
6. clarity on wording/guidance	Definition of stakeholders // key stakeholders	Yes.	see above	see above	no
7. additional dr in ag	Disclosure requirements are too granular. They build on GRI standards, by transforming many guidance in requirements (e.g., item c- ii) of paragraph 41 of the ED on how the organisations' strategy and business model aim to prevent negative impacts.	No.	AG30 seems to be a disclosure requirement	to be aligned	Simplification issue paper
8. Should be principle based	stakeholder's expectations	No.	To be simplified	to be aligned	no
9. merge SBM 2 and 3	material sustainability impacts (IRO)	No.	SBM 1, 2, GR 3 and 4 to be merged. SBM 3 and SBM 4 are needed separately (impacts/R&O).	no action	no
10. focus on relevant stakeholders	Stakeholders process	Yes.	Already like this: ESRS 2 AG 30 'key relevant' stakeholders. Double check that this is clear enough	to be aligned	no
11. disclose on stakeholder engagement process	link with DR S1-2, DR S2-2, DR S3-2 and DR S4-2 ?	No.	Streamline to avoid redundancies.	to be aligned	simplification issue paper
12. Amendment of SBM 2 to also require information about how a company engages with stakeholders	link with DR 2-SBM2	No.	see above	see above	no

Addition from external consultant coding

The DR should target the stakeholder engagement process
 Difficulty for summarising stakeholders views
 harmonisation of definitions : stakeholders, key stakeholders, affected stakeholders, users

Q13: Please, rate to what extent do you think DR 2-SBM 3 – Interaction of impacts and the undertaking’ strategy and business model

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation		set 2	no action	
2. More AG to be developed in the future					
3. Clarity on business model	Clarification	No.	The comment is suggesting to refer to interactions of the STRATEGY with IROs as it is not clear how the BM interacts with IROs. Agree and propose to refer to Strategy only.	to be aligned	No
4. merge SBM1, 3 and 4	Merge with DR2-SBM 4	yes - DG 18/ DG 19 - G6/G7	Merge SBM 3 and SBM 4	to be aligned	No
5. too detailed and need guidance	Clarification	No.	Simplification (no additional guidance can be drafted at this stage)	to be aligned	no
6. duplication - proposed also by DR 2-IRO 2 and 3	Duplication of DR 2-SBM 3 and 4 with DR 2-IRO 2 and 3	yes - DG 18/ DG 19 - G6/G7	Merge SBM 3 and SBM 4	to be aligned	no
7. It should at least be clarified that IRO-2 and IRO-3 can be disclosed on an integrated basis	Duplication	yes - DG 18/ DG 19 - G6/G7	Merge SBM 3, SBM 4, IRO 2 and 3	to be aligned	no
8. resilience’ is an abstract concept, making it difficult to be verified.	Definition	No.	critical comment. definition of the concept of resilience (AG32b) - alignment with IFRS will help	to be aligned	no
9. consider the long-term time horizon under which the impact on the enterprise value should be considered. The horizon could vary based on the issue at hand	Time horizon	No.	The comment is not asking to modify the standard.	no action	no
Addition from external consultant coding					
Consider merging with SBM 1					

Q14: Please, rate to what extent do you think DR 2-SBM 4 – Interaction of risks and opportunities and the undertakings’ strategy and business model

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitalisation	not in set 1		no action	no
2. More AG to be developed in the future					
3. clarity/Guidance needed	Needed guidance	yes	Try to clarify better what is expected	to be amended	no
4. linkage of policy disclosures	Missing link with IRO in §47			to be amended	no
5. alignment with ISSB	ISSB alignment		Missing link with IRO in §47 See in particular IFRS S1 par. 14/15 for financial materiality	to be aligned (as per the general approach)	no
6. avoid duplication	Duplication with SBM1 and 3	yes - DG 18/ DG 19 - G6/G7	Merge SBM 3 and SBM 4	to be aligned	no
7. Suggestion to merge with SBM1 and SBM4	same as Q11	yes - DG 18/ DG 19 - G6/G7	Merge SBM 3 and SBM 4	to be aligned	no
8. 47(c) part i. and ii. should be removed	too detailed	No	47 (c) i and ii need to be kept in the standard as they are core. However all the text will be reviewed for simplification.	no action	no
9. some of the information required, by paragraph 47 (c) and (d) (and further complemented by AG 34, could be too sensitive to be disclosed	confidentiality	No	already covered by CSRD Art 19a) point 3	no action	no
10. If a general strategy is to be considered, principles of integrated reporting should be applied	integrated reporting	No	Mention integrated reporting to clarify that it is not the general strategy that matters here but the integration of sustainability in strategy. T	to be considered	no
11. need for datatool links	link with ESRS E4: https://www.iucn.org/regions/washington-dc-office/our-work/species-threat-abatement-and-recovery-star-metric https://www.ibat-alliance.org/ https://www.wri.org/aqueduct	No	Comment specific to IRO AG in ESRS E4	no actions for ESRS 2	no
12. auditability difficult	auditability	No	Noted	no action	no
Addition from external consultant coding					
provide additional guidance (resilience of the strategy)					

Q15: Please, rate to what extent do you think DR 2-GOV 1 – Roles and responsibilities of the administrative, management and supervisory bodies

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation	no	set2	no action	
2. More AG to be developed in the future					
3. the level of detail and the depth to report on in the organization is too granular	too granular	yes, T1	simplification needed	to be aligned	no
4. align terminology with ESRS2, G1	definition (governance bodies)	yes - DG 65	rationalisation of terms used	to be aligned	no
5. exclude other key personnel/operational personnel /management senior executives	Scope	no	Disagree that this DR should be limited to the governing body. See GRI 2-13: delegation of responsibilities in management of impacts. Important to disclose also other levels involved. Propose to add 'and management levels' in the title of this DR (as it is already in par. 50 of ESRS 2	to be aligned	no
6. wording change to include CEO or deputy CEO and also refer to expertise and skills as a whole or individually	refer also to level of granularity : to be analysed together		agreed	to be aligned	no
7. Additional guidance on the criteria relating to giving information on management members' level of expertise as this assessment may be difficult for auditors	more expected guidance on AG38, on expected level of expertise	no	to be taken	no actions	no
8. ISSB alignment	general ISSB alignment	yes - IFRS 8, IFRS 15, IFRS 11			ISSB issue papers
9. Is not CSRD aligned - goes partially beyond scope of SCR D	beyond scope of the CSRD, need the development of an overarching governance concept	no	This comment refer specifically to "senior executives and operational levels" and "key personnel" (see para 52) and requires the criteria for nominating and selecting members of bodies and other key personnel (see para 52d)). Disagree that we should delete the reference to senior executives and operational levels as this is also in GRI 2-13. Nomination to be discussed as part of the G1 discussion.	No action	no
10. Some information is already provided by listed undertakings in the Corporate Governance Statement. In order to avoid duplication, incorporation by reference should be permitted	merge with Governance standard	no	Already covered in the approach to incorporation by reference.	no action	Incorporation by reference
11. disclose on nomination process outcome	need to disclosure the nomination process	no	to be discussed in G1	to be discussed in G1	no
12. merge DR 2 GOV-4 and DR G1-6	merge with Governance standard	no	to be discussed in G1	to be discussed in G1	no
Addition from external consultant coding					
Narrow the scope					

Q16: Please, rate to what extent do you think DR 2- GOV 2 – Information of administrative, management and supervisory bodies about sustainability matters

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. combine 2-GOV 2 and 2-GOV 3	Merge of GOV 2 and GOV 3	no	Merge of GOV 2 and GOV 3	to be aligned	no
4. exclude senior executives	same point as Q15	no	n/a	no action	no
5. clarification of the concept of 'interaction' a	clarification (AG 44 a 'interact')	no	wording clarification	to take into account	no
6. alignment with CSRD/CSDD	alignment with CSDDD	yes	Alignment with CSDDD not possible at this stage (it will be done when CSDDD will be into force with an amendment)	no action	no
7. Excessive granularity (including the AG)/Duplication should be avoided	same point as Q15	No	n/a		n/a
8. aligned to existing regulation/Overarching concept	same point as Q15	No	n/a		n/a
9. phased approach preferred	phased approach	No	Proposal to postpone to year 2	to be aligned	no
10. Guidance on how the information on the sustainability-related perspectives of stakeholders that have an interest in or are affected by the undertaking's activities shall be verified by investors if only processes are described	more guidance is expected on how the information can be checked	no	This comment asks to add information to allow investors to verify the information (the DR only asks to describe processes). We would not consider to add new datapoints at this stage.	no action	no
11. move para. 57 to Appl. Guidance	§57 in AG	no	see when redrafting	to be aligned	no
12. Information may be confidential (para 53)	information §53 (who is in charge and organizational structure for IROs that trigger changes to business model) could be confidential	no	Follow the approach of GRI 2-13 to describe delegation of responsibilities	to be aligned	no
13. Focus on process and not how management is informed	This comment asks to cover process of assessing/ considering/managing sustainability IROS instead of on how the governance bodies and management are merely informed.	no	This would result in adding new datapoints, we would suggest to avoid at this stage.	no action	no
14. Communication channel to be added	definition	no	could be useful to have a complete picture	to be aligned	no
Addition from external consultant coding					
Management level senior executives (§55) should be excluded from the scope principle of proportionality (to avoid burdensome constraints) Adopt phase-in approach					

Q17: Please, rate to what extent do you think DR 2- GOV 3 – Sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. Recommend to combine DR 2 GOV-2 and DR 2 GOV-3.	reorganisation of the DR	no	Merge with GOV 2	to be aligned	no
4. limited information value	list of material issues	no	As it is the DR is resulting in excessive and immaterial info. It should instead require a list of material sustainability matters addressed in the reporting period and the key decisions made regarding sustainability matters. + this reporting should include disclosure about the number and nature of critical concerns that have been communicated to the governance bodies during the year under review	to be aligned	no
5. ISSB alignment	ISSB alignment	yes - IFRS 13	agree	to be aligned	ESRS 2 comparison with IFRS S1
6. deletion of para 60 or parts of it as not believed to result in relevant information	merge of §60 and 61	no	see above		no
7. phased approach preferred	phased approach	No	postponed to year 2	to be aligned	no
8. CSDD alignment needed	same point as Q16	No	n/a		
9. Need for description of “key” sustainability matters AG 46,47, GOV3 to be comparable with information that – for instance – the supervisory body	Do not agree with paragraph AG46 when it states that the undertaking is not required to disclose the discussions and the outcome of the decisions taken when addressing sustainability-related matters by its governance bodies.	No	Disagree to add another datapoint	no action	no
10. Need for overarching governance concept	same point as Q15	No	n/a	no specific action	no
11. clarification material sustainability matters to be considered for the disclosure.	clarification is needed	No	refocus and simplify	to be aligned	no
12. The level of detail should be calibrated with what is decision-useful for the data user	rewording of §60	No	refocus and simplify	to be aligned	no
13. delete “adequately” para. 59	deletion of §59	No	agree that redraft is needed	to be aligned	no
14. can only take the form of a general presentation regarding subjects publicly disclosed without referring to any sensitive information or confidential project	confidentiality	Yes - T14	already covered in CSRD	no action	no
15. Focus on governance process to manage and assess, in line with objective, targets. Missing actual integration and management or sustainability risks and actual and potential adverse impacts.	same point as Q16	No	n/a	no specific action	no

Addition from external consultant coding

§60 should be deleted (potential confidential information)
part of §59 should be deleted
merge GOV2 and GOV 3
Phase-in approach

Q17: Please, rate to what extent do you think DR 2- GOV 3 – Sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
------------	--	--	----------------------------	---	--

Principle of proportionality

Q18: Please, rate to what extent do you think DR 2- GOV 4 – Integration of sustainability strategies and performance in incentive schemes

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. Reporting on incentives already obliged in some legislations/referencing could be made	part of CSRD	No.	Addressed in the inc. by reference new proposal	no action	Incorporation by reference
4. limit to corporate bodies/executive directors	rewording/scope	Yes, see ESRS 2 - DG 41	GRI 2-19 covers also senior executives. CSRD textually limit this disclosure to members of the bodies. We suggest to maintain the current scope as datapoint is	no action	no
5. ESRS generally in line with ISSB	general ISSB alignment	yes	ISSB alignment of wording	to be aligned	no
6. Excessive Granularity, eg, para 64 and AG	paragraph 64 and related AG	Yes, but here additional comment.	Simplification	to be aligned	no
7. phasing in approach needed	phased approach	No.	phase-in to year 2	phase-in to year 2	no
8. align to CSRD/CSDD	same point as Q16	Yes	n/a		
9. Clarification on disclosure needed as there may be sensitive information	clarify on sensitive information	No.	Relevant.	already covered in CSRD	no
10. overlaps with DR 6 of G1	structure	Yes, see ESRS 2 - T1	Relevant.	Draft to be amended after SRB decision to change the structure.	Simplification issue paper
11. overarchy concept needed/ot aligned with other EU governance reporting requirements	same point as Q15		n/a		
12. Match remuneration with sustainability- or climate-related metrics	Missing	No.	This would result in two additional datapoints. We suggest not to add them at this stage.	no action	no
13. ESRS refer to normative acts which do not have as status of legislation	wording change	No.	CSRD requires to cover incentives to the members of G bodies. We may discuss on scope (whether to include employees and senior executives) but the DR has to stay.	no action	no

Q19: Please, rate to what extent do you think DR 2- GOV 5 – Integration of sustainability strategies and performance in incentive schemes

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. clarity needed as there is no framework for the due diligence	DR 2- GOV 5 incl. AG55 definition	Yes, ESRS 2 - T1. But here more detailed and with wider range.	This comment consider tha this DR is vague and rudimentary.	to be discussed	Issue paper on due diligence
4. phasing in needed, e.g., in the first year only high-level comments are provided.	CSRD provides the structure.	Yes, ESRS 2 - T1. But here more detailed and with wider range.	postpone to year 2	postpone to year 2	no
5. processes which will be framed by the CSDDD, but rather refer to the “approach” of the entity.	phased approach		Despite the CSDDD not being active, international references are embedded in the CSRD	no action	no
6. Disclosure requirement may go beyond the CSRDirective.	CSRD provides the structure.	Yes, ESRS 2 - T1. But here more detailed and with wider range.	Despite the CSDDD not being active, international references are embedded in the CSRD	no action	no
7. Materiality assessment should be performed in the mainstream value chain only with regards to these clients’ own operations.	definition of “boundaries” and value chain”	No.	Specific guidance on value chain for financial sector in Set 2 not now.	no action	no
8. ESRS should not describe / prescribe the due diligence process (see ESRS 1 ch. 2.5, App. C	Auditability	No.	In line with CSRD Art. 19a, 3ei	No action.	no
9. high costs - mapping due diligence disclosures (AG 55)	burdensome	No.	In line with CSRD Art. 19a, 3ei	to be discussed	no

Q20: Please, rate to what extent do you think DR 2-IRO 1 – Description of the processes to identify material sustainability impacts, risks and opportunities

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future	further guidance		set 2	no action	
3. clarity/guidance needed for companies on how to perform materiality assessment	wording	Clarifications on implementation of double materiality to be included in Set 1. More AG in future sets.	Comment also raised in ESRS 1 (comment 13 - Q18, comment 9 and 12 - Q19)	to be aligned	Guidance on materiality
4. Additional guidance is needed on the materiality assessment for subsidiaries of non-EU based parents.			Not feasible in Set 1	no action	no
5. Too granular. Paragraph 74 is highlighted as being too detailed. Conversely, one respondent calls for more granular disclosures.	IRO, by far the complexest DR.	Yes, comment on streamlining ESRS 2 - T1	Streamline the wording	to be aligned	no
6. clarification of the concepts 'severity' and 'likelihood' and how they interact between each other when it comes to identifying material	Wording: clarification of the concepts 'severity' and 'likelihood' (as per paragraph 74(b)(iii))	No.	Clarifications on implementation of double materiality to be included in Set 1. More AG in future sets.	Draft to be amended.	Guidance on materiality
7. Sector-agnostic ESRS seem not to be truly suitable for all sectors.	Missing	No.	IRO 1 is sector agnostic as all the undertakings are required to disclose materiality process.	no action	no
8. cost benefit analysis. Paragraph AG 61 (impacts which the undertaking is involved in as a result of its business relationships) and value chain considerations are mentioned	Cost benefit analysis	No.	In line with CSRD Art. 19a, No action. 3 phasing in is allowed.		no
9. ISSB alignment should be strengthened	ISSB alignment	yes	Alignment with ISSB will be considered, however need to cover double materiality.	to be aligned	no
10. Develop common detailed and prescriptive methodologies to take into account impacts on the entire value chain of each sector (for example a common methodology to measure full value chain scope 3 emissions).	Clarification		Sector specific guidance in Set 2	no action	no
11. Suggestion to consolidate information on the processes which identify material sustainability impacts	Definition: Consolidation of information.	Yes, comment on streamlining ESRS 2 - T1	Consolidate contents on the process from IRO into ESRS 1.	to be aligned	Guidance on materiality
12. AG 66 c) anticipates the CSDDD which is not yet effective. This information should not be requested before implementation of this directive	CSRD provides the structure.	Yes, ESRS 2 - T1. But here more detailed and with wider range.	The content is consistent with international guidelines on DD that are mentioned in the CSRD.	no action	no

Q20: Please, rate to what extent do you think DR 2-IRO 1 – Description of the processes to identify material sustainability impacts, risks and opportunities

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
13. Disagreement with rebuttable presumption	rebuttable presumption	No.	Approach to materiality	to be discussed	Approach to materiality
14. Companies should be able to omit the information if the information is confidential	clarify on sensitive information	No.	Possible only if member states have implemented this action. ERS cannot have such exception as this is regulated in level 1.	no action	no
15. Management report should focus on material information. The level of granularity has an impact on the efforts and costs needed for the assurance.	Auditability	No.	Simplification	to be aligned	no
Addition from external consultant coding include reference to materiality matrix provide clear guidance on how to perform a materiality assessment					

Q21: Please, rate to what extent do you think DR 2-IRO 2 – Outcome of the undertaking’s assessment of material sustainability impacts risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. Clarity/guidance needed in the materiality assessment overall as well as in complying with this DR. There is a reference to GRI as an example of clear guidance on this matter.	DR 77(a) is similar to DRs 41 and 47.	yes	wording to be simplified, overlaps par. 77, 41 an 47 to be addressed	to be aligned	no
4. Not support the proposed rebuttable presumption approach	rebuttable presumption	yes - ESRS 1-T1.2	Approach to materiality	to be discussed	Approach to materiality
5. Burdensome/Cost analysis needed (value chain considerations are needed as well as the difficulties in measuring the effects of sustainability risks and opportunities on medium- and long-term FCF)	Complexity and overload	No.	Many of the comments about costs relate to the explicit approach in the rebuttable presumption. This is being addressed.	no action	no
6. GRI and ISSB alignment supported	GRI alignment	yes	Materiality guidance to be aligned with IFRS (financial mat.) and GRI (impact). This impacts ESRS 1 not ESRS 2.	to be aligned	GRI alignment
7. Suggest revising language (for example paragraph 77 b) is hard to follow)	wording -	yes - DG 58	simplification needed	to be aligned	no
8. DR should prioritise the SFDR requirements	phase-in	yes	This DR is fundamental as it requires to provide the list of material IROs as resulting from materiality assessment. Not possible to postpone effective date.	no action	no
9. Merge IRO 2 and IRO 3	merge IRO	yes, ESRS 2 - DG 53	simplification needed	Draft to be amended.	no
10. Numerous DR considered as sector-agnostic disclosures are rather sector-specific disclosures	sector specific		See Detailed assessment	to be aligned	Detailed assessment at DR level
11. Express materiality assessment as the leading principle.	IRO-definition	No.	Approach to materiality	Approach to materiality	Approach to materiality
Addition from external consultant coding					
Redraft § 76 and 79 which are difficult to read					

Q22: Please, rate to what extent do you think DR 2-IRO 3 – Outcome of the undertaking’s assessment of material sustainability impacts risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1	digitisation		set 2	no action	
2. More AG to be developed in the future					
3. Too detailed compared to the relevance of the entity-specific disclosure	too detailed requirements	Yes; ESRS 2 - DG 59	only 1 comment	no action	
4. IRO-2 and IRO-3 of ESRS 2 would require centralised disclosure of IROs across topics, which would lead to a significant need for cross-referencing	Structure	No.	Centralized info about IROs complexifies the report as many cross-references to topics are needed. List of IROs is considered part of the cross cutting disclosure so centralized presentation is preferable.	no action	no
5. DR should prioritise the SFDR requirements	Structure	yes	Approach to materiality	to be discussed	Approach to materiality
6. Merge IRO 2 and IRO 3	Merge IRO	yes, ESRS 2 - DG 53	agreed	to be aligned	no

Q39: Please, rate to what extent do you think ESRS 2 – General, strategy, governance and

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GR alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
1. Out of scope of Set 1					
2. More AG to be developed in the future					
3. Consolidation of ESRS 2 and G1,G1	architecture	yes - T1	agreed some elements of G1 to be merged in ESRS 2	to be discussed	G1 discussion
4. alignment to issb/SFDR as building block approach	architecture	yes - row 46 (no reference number)	to be aligned (subject to EU ambitions and double materiality)	to be aligned	Comparison ESRS 2 versus IFRS S1 (wording) ISSB alignment Architecture
5. Merge 2-GOV4 and G1-6, 2-GOV1 and G1-1, G1-9	architecture	yes - T1	part of streamlining and architecture	no further action as	no
6. Application guidance should refer to CSDD (until finalization a placeholder should be included)	CSRD	yes	already addressed	no action	no
7. Suggest restructure ESRS2	architecture	yes - T1, T14	agreed	to be aligned	simplification of ESRS
8. Enable rebuttable presumption	reb. Presumption	yes	Approach to materiality	Approach to materiality	Approach to materiality
9. Too many narratives/generic information	structure	yes - T1	do not agree; sust. Reporting in itself is more narrative	no action	no
10. Recommendation of a phased approach and prioritisation	phase-in	yes	Detailed assessment at level of DR	Detailed assessment at level of DR	Detailed assessment at level of DR
11. First report only on the direct relationships	value chain	yes	Phase in	Phase in	Value chain
12. value chain: Clarify on what is meant by "under the influence of".	value chain	yes	CSRD phased-in approach; rework on value chain	no further action as already identified	Value chain
13. Concerns on not legal status of CSDD	CSRD	yes	CSDD will not be included as not enacted yet	to be aligned	no
14. Affected stakeholders should be integral to on-going due diligence and not part of an annual materiality proces	DD	no	ESRS are not prescribing behavior; but see appendix 3 of ESRS 1	no action	no

Q39: Please, rate to what extent do you think ESRS 2 – General, strategy, governance and

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GR alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
15. Breakdowns by country no matter significant they are	granularity	no	10% threshold for financial materiality to stay but next to it qualitative threshold on impact materiality to be added	to be aligned	no
16. Franchised/licensed operations should be included in total headcount and total turnover	definition	no	no; this is not in line with EU understanding of "employees" as per EU directive	no action	no
17. ESRS 2-GOV3 and ESRS-GR4 should be removed for confidentiality reasons.	granularity	yes - T14	see ESRS 2-GR 1 para 5 (b) use of the option. Need a principle in ESRS 1 that allows for "information prejudicial to be not disclosed" based on CSRD and member state option	Draft to be amended	no
18. DR ESRS 2-GR 5 GR6 and GR8 should be principles.	Principles/disclosures	no	Move principles from ESRS 1 to ESRS 2 when they refer to GR 1 to 10 to streamline ESRS 1 and enhance clarity of ESRS 2.	to be aligned	no
19. Support of an integrated reporting approach	structure	yes - DG 24	not an option due to CSRD but inc. By ref.	no action	no
20. Need for impact materiality determination	imp. Mat	yes	Clarifications to materiality	to be aligned	Additional guidance on materiality
21. Indication that ESG materiality and financial materiality are not the same thing would be appreciated.	double mat.	yes - G3	see ESRS 1 on this	no action for ESRS 2	no
22. due diligence OECD/UNGP definition of responsibility would be appreciated.	DD	yes - G8	part of DD rework for ESRS 1	no action for ESRS 2	no
23. Concern of additional auditing/assurance procedures due to reference to third frameworks	DD	yes	CSRD is referring to those third frameworks	no action	no

Q39: Please, rate to what extent do you think ESRS 2 – General, strategy, governance and

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
24. Materiality assessment can be unreasonably burdensome as some sector agnostic DRs seem to be unsuitable for all sectors	granularity	yes	Detailed assessment at level of DR	Detailed assessment at level of DR	Detailed assessment at level of DR
25. Instead of Administrative, management and supervisory bodies" (AMSB) refer only to the highest governance body	definition	yes - IFRS 16	term is based on CSRD	no action	no
26. Eliminate requirements from application guidance.	granularity	yes	AG "shalls" will be moved to main text + streamline	no further action as already identified	no
27. Include childrens rights.	human rights	yes	considered as subset of human rights;; avoid being too granular	no action	no
28. Incorporation by reference to Pillar 3 reports or embed them in ESRS	sector specific	yes	inc. by ref.	inc. by ref.	inc. by ref.
29. Concern about rebuttable presumption	reb. Presumption	yes	App. to mat.	App. to mat.	App. to mat.
30. More guidance on how to apply the respective disclosure requirements.	more guidance	yes	ESRS already too granular	no action	no
31. Inconsistent structure DR do not have an objective or principle.	granularity	yes	ESRS 2 disclosures to be streamlined	no further action as already identified	no
32. Several quantitative reporting indicators are not well suited for "proportional inclusion"	value chain	no	agree they are separate	no action	no
33. Recommend to kept term 'value chain' separate from the term 'operations'	general	no	in ESRS 2 value chain already distinct from own operations	no action	no
34. Section H: Compliance with these disclosures does not require any significant resources.	Alignment with other framework	yes	already addressed	no further action as already identified	no
35. Should better utilise UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises and the OECD Guidance on Responsible Business Conduct, and the GRI Universal standards.	value chain	yes - G3	better alignemnt with these guidelines	to be aligned	due diligence
36. Value creation should be defined, and it should be clarified how and to what extent it takes into account the double materiality perspective	ISSB alignment	yes - G3	already addressed	no further action as already identified	Value chain
37. ESRS' concept of financial materiality should be as aligned as possible with the ISSB's concept of enterprise value creation	wording	yes - G3	already identified	to be aligned	ISSB alignment
38. 'Key drivers' of value creation should be defined, explained how it differs from 'key resources' and complemented with examples	definition	yes - IFRS 16	term is based on CSRD	no action	no

Q39: Please, rate to what extent do you think ESRS 2 – General, strategy, governance and

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GRI alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
39. Replace 'governance bodies' for 'administrative, management and supervisory body' throughout the standards, and define it by making reference to the wider definition of 'director' that is provided for by SRD II	wording		definition of 'directors'	to be aligned	no
40. Disclosure obligations should prioritise improving transparency rather than addressing conduct issues	materiality	yes	Rebuttable presumption	Rebuttable presumption	Rebuttable presumption
41. Materiality assessment should explicitly refer to the "materiality matrix"	confidentiality		Materiality matrix/content index	to be aligned	no
42. Many disclosure requirements might damage the companies' commercial position	materiality	yes - T3, G1, T14	simplifications	to be aligned	no
43. Materiality principles + current design of rebuttable presumption will create a disproportionate administrative burden on reporting entities.	granularity	yes - T3, G1, T14	Rebuttable presumption	Rebuttable presumption	Rebuttable presumption
44. ESRS 2 disclosures together with the application guidance are overly detailed and granular	scope	no	simplifications	simplifications	no
45. Make a distinction between listed/large size companies and unlisted and SMEs when considering reporting obligations	EU alignment	no	already done	no action	no
46. Better alignment with EU legislation is possible	GRI alignment		international alignment	GRI alignment	GRI alignment
47. Better alignment with GRI is necessary	value chain	no	value chain paper	value chain	Value chain
48. Value chain information can be exhaustive, with a high cost, and not feasible under all circumstances; leading to many entities to provide estimated information	TCFD alignment		already aligned	no action	Value chain
49. More alignment with the structure of the reporting areas provided by the TCFD Recommendations				to be aligned	ISSB alignment: Architecture

Addition from external consultant coding

I. Reservations

- 02. Terminology. Value chain. Definition of value chain is too broad/extensive.
- 04. Comparability across sectors. Comparability across sectors will be hard. Some respondents say that guidance on which sector classification to use, and methodologies would be useful.
- 06. Insufficient guidance. Respondents request more guidance on how to apply the materiality assessment. Some suggest that a mock report is provided.
- 07. Verification of information. Concern that information cannot be verified and/or that it will be costly to do so.
- 09. National law on disclosures. Need to take into account any national laws on disclosures.

Q39: Please, rate to what extent do you think ESRS 2 – General, strategy, governance and

n. Comment	Type (Missing, Structure, definition, DD, GEN, SBM, IRO ...)	Already in TEG survey/ISSB alignment/GR I alignment	EFRAG Secretariat comments	EFRAG Secretariat conclusion no action, no action for set 1, to be completed, Draft to be amended, ... (TBD not an option anymore)	Issue paper needed ? (yes, no, to be completed)
<p>09. Timing Sequencing with CSRD and Taxonomy. Attention should be paid to the different timings of when the standards, the CSRD and the EU Taxonomy will come into force.</p> <p>11. Proportional consolidation method is complex</p> <p><i>II. Suggestions for improvement</i></p> <p>04. Emphasize affected stakeholders in ESRS 2</p> <p>04. Enhance computer readability</p> <p>04. Proportionality principle. Use proportionality principle to determine requirements.</p> <p>05. Perform cost benefit analysis on granularity required</p> <p>06. Remove rebuttable presumption</p> <p>07. Provide further instructions, examples</p> <p><i>III. Support</i></p> <p>ESRS go further than ISSB</p>					