

Appendix 2: *ESRS 2 - assesment of the individual DRs*

ESRS 1 DP 1 - Reference principles for implementation of policies adopted to manage material sustainability matters

Overall support rate (average across categories)	75,05% RAR Support: 37,55% No support: 21,77% No opinion: 40,67%
Key outcome of the consultation	Strong support from Academic, Consumer, ESG, EU citizen, Rating agency and Trade unions with 100%. Lowest support from Non-financial outside EU with 33% and Unlisted non-financial corporations with 14%.
Reference to the CSRD	Article 19a, 2d
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	N/A
Relevant for majority of undertaking across the sectors?	YES
Promoting alignment with international standards?	YES, to be updated when IFRS S1/ ERS2 analysis will be available
Operational complexity?	too detailed requirement, but in parallel need for clarification of the content of the disclosure Clarify expectation on info related to value chain participants
To be made mandatory?	YES
Possible simplification	review granularity and propose simplification
Phase-in recommendations	No phase in appropriate

ESRS 1 DP 2 - Reference principles for implementation of targets, progress and tracking effectiveness

Overall support rate (average across categories)	74,46% RAR Support: 39,11% No support: 18,67% No opinion: 42,22%
Key outcome of the consultation	Strong support from Consumer, ESG, EU citizen, Rating agency and Trade unions with 100%. Lowest support from Unlisted non-financial with 18% and Non-financial outside EU with 0%.
Reference to the CSRD	Article 19a, 2b
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	
Relevant for majority of undertaking across the sectors?	
Promoting alignment with international standards?	YES, to be updated when IFRS S1/ ESRS2 analysis will be available
Operational complexity?	Clarify expectation on info related to value chain participants
To be always mandatory	YES
Possible simplification	Consider merging DP2 with AG Alignment with ISSB Keep flexibility
Phase-in recommendations	No phase in appropriate

ESRS 1 DP 3 - Reference principles for implementation of Actions, action plans and resources in relation to policies and targets

Overall support rate (average across categories)	69,67,% RAR Support: 34,67% No support: 23,11% No opinion: 42,22%
Key outcome of the consultation	Strong support from Consumer, ESG, EU citizen, Rating agency and Trade unions with 100%. Lowest support from Non-financial outside EU with 25% and Unlisted non-financial with 11%.
Reference to the CSRD	Article 19a, 2e (iii)
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	
Relevant for majority of undertaking across the sectors?	
Promoting alignment with international standards?	YES, to be updated when IFRS S1/ ESR2 analysis will be available
Operational complexity?	Clarify expectation on info related to value chain participants
To be made mandatory?	YES
Possible simplification	define "key" in §104
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 1 - General characteristics of the sustainability reporting of the undertaking

Overall support rate (average across categories)	87% RAR Support: 39,24% No support: 6,87% No opinion: 53,88%
Key outcome of the consultation	Strong support from Financial institutions (Insurance & Other), Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Only 69% support from Consumer's organizations and 57% from Non-financial outside EU.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 90% Highest support from: ESG, Financial institutions (Insurance & Other), National standard setter, Non-financial EU, Public authority, Rating agency, Trade unions, Unlisted non-financial Lowest support from: Academic, Consumer organizations
Relevant for majority of undertaking across the sectors?	RAR of 99% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Other, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Financial (Bank), Non-financial EU.
Promoting alignment with international standards?	RAR of 71% Highest support from: Academic, Financial (Insurance & Other), Public authority, Rating agency, Trade unions. Lowest support from: Consumer, Non-financial outside EU.
Operational complexity?	No, description only
To be always mandatory	Mandatory
Possible simplification	to be updated with final CSRD text Simplification of wording Reduce granularity
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 2 - Sector(s) of activity

Overall support rate (average across categories)	85% RAR Support: 36,39% No support: 7,08% No opinion: 56,53%
Key outcome of the consultation	Strong support from Academic institutions, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Business associations and Non-financial EU with 47%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 88% Highest support from: Academic, Consumer, Financial (Insurance & Other), National standard setter, Public authority, Rating agency, Trade unions, Unlisted non-financial Lowest support from: Business associations, Non-financial EU
Relevant for majority of undertaking across the sectors?	RAR of 94% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), Non-financial outside EU, Non-governmental, Other, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Non-financial EU.
Promoting alignment with international standards?	RAR of 80% Highest support from: Academic, Consumer, ESG, Financial (Other), Non-financial outside EU, Non-governmental, Public authority, Rating agency, Unlisted non-financial. Lowest support from: Financial (Insurance), National standard setter.
Operational complexity?	Reconciliation with financial statement on information by sectors (IFRS15/ IFRS8) for information required in §12 b) c). Clarification of headcount to be taken into account Need to clarify sectors definition
To be made mandatory?	Mandatory Note that indicators related to SFDR are always mandatory
Possible simplification	Definitions to be clarified : material / significant, internal transactions, market, customer group Review AG2, AG12 (too granular) AG6 is commercially sensitive and should be deleted
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 3 - Key features of the value chain

Overall support rate (average across categories)	69% RAR Support: 33% No support: 17% No opinion: 51%
Key outcome of the consultation	Strong support from Academic institutions, Public authorities, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Business associations with 34%, Non-financials (EU & outside) with 33% and 31%, and Unlisted non-financial corporations with 30%.
Reference to the CSRD	Article 19a, 2e (ii) Article 19a, 3
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Relevance – 79% RAR Highest support from: Academic, Consumer, Financial (Insurance & Other), Non-governmental, "Other", Public authority, Trade unions, Unlisted non-financial. Lowest support from: Business association (29%), Rating agencies (0%)
Relevant for majority of undertaking across the sectors?	RAR of 82% Highest support from: Academic, Audit, Consumer, ESG, Financial (Other), Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Non-financial outside EU, Unlisted non-financial.
Promoting alignment with international standards?	70% RAR Highest support from: Academic, Consumer, ESG, Financial (Other), Other, Public authority, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (20%), Unlisted non-financial (0%).
Operational complexity?	Clarify value chain and way to perform approximation
To be always mandatory	Mandatory
Possible simplification	Merge of DR2-GR3, DR2-GR4, DR2-SBM 1 and confidentiality of AG14 (to be removed). Align with CSRD final text Definition of Key
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 4 - Key drivers of the value creation

Overall support rate (average across categories)	63% RAR Support: 18% No support: 19% No opinion: 64%
Key outcome of the consultation	Strong support from Academic institutions, Public authorities, and Trade unions with 100%. Opposition from Unlisted non-financial corporations with 33%, Financial institutions (Insurance) with 31%. Strong opposition from Non-financial EU and Business associations with 16%, and Non-financial outside EU with 0%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 73% Highest support from: Academic, ESG, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Financial institution (Insurance) (17%), Non-financial inside EU (18%)
Relevant for majority of undertaking across the sectors?	RAR of 74% Highest support from: Academic, Audit, ESG, National standard setter, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Non-financial outside EU (0%)
Promoting alignment with international standards?	RAR of 52% Highest support from: Academic, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Non-financial outside EU (0%), Unlisted non-financial (0%).
Operational complexity?	Clarify link with value chain and the disclosure objective for value creation
To be made mandatory?	Mandatory
Possible simplification	Merge of DR2-GR3, DR2-GR4, DR2-SBM 1 Simplification and less detail ISSB alignment for financial matters
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 5 - Using approximations on the disclosure in relation to boundary and value chain

Overall support rate (average across categories)	66% RAR Support: 29% No support: 13% No opinion: 58%
Key outcome of the consultation	Strong support from Academic institutions and Trade unions with 100%. Opposition from Business associations with 30% and Non-financial EU with 23%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 73% Highest support from: Academic, Consumer, Financial (Other), Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Financial (Insurance) (25%), Non-financial inside EU (20%)
Relevant for majority of undertaking across the sectors?	RAR of 86% Highest support from: Academic, Audit, Consumer, Financial (Insurance & Other), Non-financial outside EU, Non-governmental, Public authority, Trade unions, Unlisted non-financial. Lowest support from: ESG, Rating agency.
Promoting alignment with international standards?	RAR of 80% Highest support from: Academic, Consumer, National standard setter, Non-financial outside EU, Non-governmental, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Non-financial EU (22%).
Operational complexity?	Confusion between principle and disclosure. proposal to merge DR5 and DR6 Need more guidance
To be always mandatory	Yes
Possible simplification	Merge DR5 to DR9 in only one GR Clarify joint ventures/ proportional consolidation (with value chain participants)
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 6 - Disclosing on significant estimation uncertainty

Overall support rate (average across categories)	80% RAR Support: 34% No support: 9% No opinion: 58%
Key outcome of the consultation	Strong support from Academic institutions, Public authorities, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Business associations with 49%, Non-financial (EU & outside) with 43% and 42%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 92% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, "Other".
Relevant for majority of undertaking across the sectors?	RAR of 97% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Financial (Bank), Other.
Promoting alignment with international standards?	RAR of 81% Highest support from: Academic, ESG, National standard setter, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Non-financial EU (17%).
Operational complexity?	Confusion between principle and disclosure. proposal to merge DR5 and DR6 Need more guidance
To be made mandatory?	Yes
Possible simplification	Merge DR5 to DR9 in only one GR Clarify that undertakings should disclose inputs and methodology of estimation
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 7 - Changes in preparation and presentation

Overall support rate (average across categories)	89% RAR Support: 36% No support: 4% No opinion: 60%
Key outcome of the consultation	Strong support from Academic institutions, National standard setter, Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Lowest rate of approval is 69% from Business associations.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 98% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial EU, Non-governmental, "Other", Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Financial (Bank)
Relevant for majority of undertaking across the sectors?	RAR of 99% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial (EU & outside), Non-governmental, Other, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Financial (Bank)
Promoting alignment with international standards?	RAR of 86% Highest support from: Academic, Consumer, ESG, National standard setter, Non-financial outside EU, Non-governmental, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Financial institution (Insurance), Other.
Operational complexity?	limit restatement exercise which may be burdensome
To be always mandatory	Yes
Possible simplification	Merge DR5 to DR9 in only one GR Limit restatement: Proposal to require only explanations and not restatement for value chain; restatement only for financial reporting perimeter. §25d): add if impracticable or too onerous
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 8 - Prior period errors

Overall support rate (average across categories)	83% RAR Support: 34% No support: 7% No opinion: 59%
Key outcome of the consultation	Strong support from Academic institutions, National standard setter, Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Unlisted non-financial with 46%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 93% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial EU, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Other, Financial (Bank).
Relevant for majority of undertaking across the sectors?	RAR of 92% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial (EU & outside), Non-governmental, Other, Public authority, Rating agency, Trade union. Lowest support from: Financial (Bank), Unlisted non-financial.
Promoting alignment with international standards?	RAR of 72% Highest support from: Academic, Consumer, National standard setter, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Unlisted non-financial (0%).
Operational complexity?	No
To be made mandatory?	Yes
Possible simplification	Merge DR5 to DR9 in only one GR Clarification that only "material" errors should be corrected.
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 9 - On other sustainability reporting pronouncements

Overall support rate (average across categories)	81% RAR Support: 28% No support: 8% No opinion: 64%
Key outcome of the consultation	Strong support from Academic institutions, Consumer organizations, Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Unlisted non-financial with 48% and Business associations with 37%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 90% Highest support from: Academic, Consumer, ESG, Financial (Insurance), National standard setter, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Non-financial EU.
Relevant for majority of undertaking across the sectors?	RAR of 94% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Other, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Financial (Bank), Unlisted non-financial.
Promoting alignment with international standards?	RAR of 67% Highest support from: Academic, ESG, Financial (Insurance & Other), Non-governmental, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Unlisted non-financial (0%).
Operational complexity?	No, but is this DR useful?
To be always mandatory	Voluntary
Possible simplification	Merge DR5 to DR9 in only one GR Some wording suggestions 'Pronouncement' is not defined
Phase-in recommendations	No phase in appropriate

ESRS 2 - GR 10 - General statement of compliance

Overall support rate (average across categories)	84% RAR Support: 35% No support: 6% No opinion: 60%
Key outcome of the consultation	Strong support from Academic institutions, Consumer organizations, ESG, Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from "Other" with 44%.
Reference to the CSRD	
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 89% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial EU, Non-governmental, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Other (0%)
Relevant for majority of undertaking across the sectors?	RAR of 81% Highest support from: Academic, Consumer, ESG, National standard setter, Non-financial outside EU, Non-governmental, Rating agency, Trade unions. Lowest support from: Financial (Insurance), Other (0%)
Promoting alignment with international standards?	RAR of 68% Highest support from: Academic, Consumer, ESG, Non-governmental, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Unlisted non-financial (0%).
Operational complexity?	Very granular for 30b)
To be made mandatory?	Yes
Possible simplification	Need for a statement of compliance? overall statement only Simplify / reduce granularity 30(b) ii, It is difficult to understand how this differs from the materiality analysis and its disclosure 30 (b)(i) excessive. The characteristics of information quality should underpin all information disclosed, so no need for this specific statement AG 23 redundant with IRO AG22 to be moved to the main text
Phase-in recommendations	No phase in appropriate

ESRS 2 - SBM 1 - Overview of strategy and business model

Overall support rate (average across categories)	85% RAR Support: 39% No support: 7% No opinion: 54%
Key outcome of the consultation	Strong support from Consumer organizations, National standard setters, Public authorities, Rating agencies, and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Business associations with 41%.
Reference to the CSRD	Article 19a, 2a
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 91% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association, Non-financial EU.
Relevant for majority of undertaking across the sectors?	RAR of 92% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Unlisted non-financial.
Promoting alignment with international standards?	RAR of 89% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Other, Public authority, Rating agency, Trade unions. Lowest support from: Non-financial EU, Unlisted non-financial.
Operational complexity?	Need clarification of wordings definitions of key stakeholders
To be always mandatory	Yes
Possible simplification	Merge with DR3 and DR4, see also possible merge with SBM2 Value creation for all the stakeholders VS enterprise value creation Having sustainability plans is not mandatory, so need to redraft 'whether and how' To support moving Transition Plans from environmental standards to sector specific standards, need to have here a requirement 'when an undertaking has transition plans for biodiversity they have to be illustrated' to be discussed
Phase-in recommendations	No phase in appropriate

ESRS 2 - SBM 2 - Views, interests and expectations of stakeholders

Overall support rate (average across categories)	70% RAR Support: 31% No support: 15% No opinion: 54%
Key outcome of the consultation	Strong support from Public authorities and Trade unions with 100%; as well as from other respondents with over 90% approval. Strong opposition from Business associations with 20% and Non-financial outside EU with 0%.
Reference to the CSRD	Article 19a, 2a
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 82% Highest support from: Academic, ESG, Financial (Insurance & Other), National standard setter, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association (27%), Other.
Relevant for majority of undertaking across the sectors?	RAR of 78% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association (21%), Non-financial outside EU (0%)
Promoting alignment with international standards?	RAR of 53% Highest support from: Consumer, National standard setter, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Non-financial outside EU (0%), Unlisted non-financial (0%).
Operational complexity?	
To be made mandatory?	yes
Possible simplification	Define scope of stakeholders, merge with SBM1? Simplification Do we need this DR or shall we simply have it integrated into the different topics? "Usefulness to AG 30 c) and 38 a), b) to be considered/ Simplification needed. Agreed to simplify, however this DR covers stakeholder engagement and a central disclosure across all topics is necessary 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. Proposal to change the name of this DR to be 'stakeholder engagement' / no merger into other DRs
Phase-in recommendations	No phase in appropriate

ESRS 2 - SBM 3 - Interaction of impacts and the undertaking's strategy and business model

Overall support rate (average across categories)	77% RAR Support: 32% No support: 12% No opinion: 55%
Key outcome of the consultation	Strong support from Academic, Consumer organizations, Public authorities and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Unlisted non-financial corporations with 33%. Strong opposition from Non-financial outside EU with 0%.
Reference to the CSRD	Article 19a, 2a
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 96% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Other, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Audit, Non-financial EU.
Relevant for majority of undertaking across the sectors?	RAR of 86% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Other, Public authority, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Unlisted non-financial.
Promoting alignment with international standards?	RAR of 61% Highest support from: Academic, Consumer, ESG, National standard setter, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Other (0%), Unlisted non-financial (0%).
Operational complexity?	Value Chain
To be always mandatory	yes
Possible simplification	Strealigne/ potential merge between SBM 3 and 4 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. Definition of the concept of resilience (AG32b) - alignment with IFRS to help Clarify better what is expected undertakings to report
Phase-in recommendations	No phase in appropriate

ESRS 2 - SBM 4 - Interaction of risks and opportunities and the undertaking's strategy and business model

Overall support rate (average across categories)	77% RAR Support: 33% No support: 12% No opinion: 55%
Key outcome of the consultation	Strong support from Academic, Consumer organization, Public authority and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from non financial corporation outside EU with 0% and from unlisted non-financial corporation with 33%.
Reference to the CSRD	Article 19a, 2a
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	RAR of 96% Highest support from: Academic, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Other, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Audit, Business association
Relevant for majority of undertaking across the sectors?	RAR of 85% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Unlisted non-financial.
Promoting alignment with international standards?	RAR of 61% Highest support from: Academic, Consumer, ESG, National standard setter, Non-governmental, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Non-financial outside EU (0%), Other (0%), Unlisted non-financial (0%).
Operational complexity?	Value Chain
To be made mandatory?	yes
Possible simplification	Strealigne/ potential merge between SBM 3 and 4 - see SBM3 comments
Phase-in recommendations	No phase in appropriate

ESRS 2 -GOV 1 - Roles and responsibilities of the administrative, management and supervisory bodies

Overall support rate (average across categories)	72% RAR Support: 33% No support: 14% No opinion: 53%
Key outcome of the consultation	Strong support from Academic, Public authority and Trade unions with 100%; as well as from other respondents with over 80% approval. Opposition from business association with 25% and from non financial corporation inside and outside EU with 37% and 43% .
Reference to the CSRD	Article 19a, 2c Article 19b
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes supports a faithful representation in order to reflect the formal role and composition of the governance bodies. However, other key personnel/operational personnel could be removed for simplification. RAR of 78% Highest support from: Academic, ESG, Financial institution (insurance), NGO, Public authority, rating agency, trade unions, unlisted non-financial corporations Lowest support from: business organization, non financial corporation inside EU
Relevant for majority of undertaking across the sectors?	Yes - DR is not sector specific. Enables understanding of the ability of governance bodies of all undertakings to provide an effective oversight on sustainability matters. RAR of 84% Highest support from: Academic, Audit, ESG, Financial (Insurance), National standard setter, Non-financial outside EU, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Consumer, Other.
Promoting alignment with international standards?	Yes to be aligned with ISSB for governance and CSDDD RAR of 57% Highest support from: Academic, Consumer, ESG, Non-governmental, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Other (0%), Unlisted non-financial (0%).
Operational complexity?	Operational burden: Some disclosure requirements include granularity of data which will be not feasible for reporting for companies or are too prescriptive/detailed (see possible simplification).
To be made mandatory?	Yes
Possible simplification	Merge GOV 1 and G1-1 and G1-9 (to be discussed when we discuss G1) See ESRS 1 T1 comments: refer to the European definition of 'Directors' Include also CEO and deputy CEO Reference to the nomination process to be discussed as part of G1 discussion Include in this DR information on composition of bodies as proposed in ESRS G1
Phase-in recommendations	No phase in appropriate

ESRS 2 - GOV 2 - Information of administrative, management and supervisory bodies about sustainability matters

Overall support rate (average across categories)	78% RAR Support: 35% No support: 12% No opinion: 53%
Key outcome of the consultation	Strong support from Academic, Consumer organization, Public authority and Trade unions with 100%; as well as from other respondents with over 80% approval. Opposition from non financial corporation outside EU with 29% .
Reference to the CSRD	Article 19a, 2c Article 19b
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes as enables users to understand whether the bodies have access to the necessary information in order to exercise their role. RAR of 90% Highest support from: Academic, Audit firm, Consumer organization, ESG, Financial institutions (insurance and others), NGO, Others, Public Authority, Trade unions, unlisted non-financial corporations Lowest support from: Business association, rating agency and analysts
Relevant for majority of undertaking across the sectors?	Yes - DR is not sector specific. RAR of 95% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Other, Public authority, Rating agency, Trade unions. Lowest support from: Financial (Bank), Unlisted non-financial.
Promoting alignment with international standards?	Yes to be aligned with ISSB for governance and CSDDD RAR of 64% Highest support from: Academic, Consumer, ESG, Financial (Other), Non-governmental, Rating agency, Trade unions. Lowest support from: Financial (Insurance) (0%), Non-financial outside EU (0%), Unlisted non-financial (0%).
Operational complexity?	Operational burden: Some disclosure requirements include granularity of data which will be not feasible for reporting for companies or are too prescriptive/detailed (see possible simplification).
To be made mandatory?	Yes
Possible simplification	- Exclude senior executives - Merge Gov 2 and Gov 3 disclosure requirements - excessive level of detail / simplification
Phase-in recommendations	proposal to postpone to year 2

ESRS 2 - GOV 3 - Sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Overall support rate (average across categories)	73% RAR Support: 31% No support: 14% No opinion: 55%
Key outcome of the consultation	Strong support from Academic, Consumer organization and Rating agency with 100%; as well as from other respondents with over 80% approval. Opposition from business association, financial institution (insurance) with 8%, from non financial corporation inside and outside EU with 28% and 0%.
Reference to the CSRD	Article 19a, 2c Article 19b
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes as it helps the users' assessment of whether the undertaking's governance engagement in sustainability matters is appropriate. RAR of 83% Highest support from: Academic, Audit firm, Consumer organization, ESG, Financial institutions (insurance and others), National Standard Setter, NGO, Public authority, Rating agency, Trade unions, unlisted non-financial corporations Lowest support from: Business association (14%), non financial corporation inside EU
Relevant for majority of undertaking across the sectors?	Yes - DR is not sector specific. RAR of 89% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association (15%), Non-financial EU.
Promoting alignment with international standards?	Yes to be aligned with ISSB for governance and CSDDD RAR of 72% Highest support from: Academic, Consumer, ESG, Non-governmental, Public authority, Rating agency, Trade unions, Unlisted non-financial. Lowest support from: Business association (0%), Financial (Insurance) (0%).
Operational complexity?	Operational burden: Para 60 resulting in the need to provide all sustainability matters addressed
To be made mandatory?	Yes
Possible simplification	- Merge Gov 2 and Gov 3 disclosure requirements to avoid duplication - Regarding para 60, there are proposals as follows: (i) to require material sustainability matters addressed; (ii) to require the sustainability matters addressed to be in connection with what is decision-useful.
Phase-in recommendations	see comment on GOV2

ESRS 2 - GOV 4 - Integration of sustainability strategies and performance in incentive schemes

Overall support rate (average across categories)	76% RAR Support: 36% No support: 11% No opinion: 53%
Key outcome of the consultation	Strong support from Academic, Consumer organization, Public authority, Rating agency and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from business association with 23% and non-financial corporation inside and outside EU with 37% and 29%.
Reference to the CSRD	Article 19a, 2(da)
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes as shows the undertaking's efforts in ensuring that sustainability matters obtain the appropriate attention from members of the administrative, management, supervisory bodies and other employees. RAR of 89% Highest support from: Academic, Audit firm, Consumer organization, ESG, Financial institutions (bank, insurance and others), National Standar Setter, NGO, Public authority, Rating agency, Trade unions, unlisted non-financial corporations Lowest support from: Business association, non-financial corporation inside EU
Relevant for majority of undertaking across the sectors?	Yes - DR is not sector specific. RAR of 91% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance & Other), National standard setter, Non-financial outside EU, Non-governmental, Public authority, Rating agency, Trade unions. Lowest support from: Business association, Non-financial EU.
Promoting alignment with international standards?	Is generally aligned with ISSB. RAR of 63% Highest support from: Academic, Consumer organization, ESG, Financial institution (other), NGO, Rating agency, Public authority Lowest support from: Business association (0%), Financial institution (insurance) (0%), Non-financial corporation outside EU (0%), Unlisted non-financial corporations (0%), Non financial corporation inside EU (20%)
Operational complexity?	Challenging for the companies outside of the NFRD scope, which will have less time to adapt their strategy and processes.
To be made mandatory?	Yes - possibly cross-references as some legislations already require this disclosure
Possible simplification	- To ensure that AG provides guidance does not add to the requirements in the main text - Overlap with DR 6 of G1 - to streamline - simplify
Phase-in recommendations	Phase-in Year 2. In Year 1, undertakings to be allowed, if they do not have the incentive schemes/strategies in place yet, to disclose the progress in adopting and integrating these strategies.

ESRS 2 - GOV 5 - Statement on due diligence

Overall support rate (average across categories)	65% RAR Support: 24% No support: 16% No opinion: 60%
Key outcome of the consultation	Strong support from Academic, Consumer organization and Public authority with 100%; as well as from other respondents with over 90% approval. Opposition from Non-financial corporation outside EU with 0% with and from Trade union with 33%
Reference to the CSRD	Article 19a, 2e (i)
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes but this DR should be a placeholder considering the finalisation of CSDD directive. RAR of 87% Highest support from: Academic, Consumer organization, ESG, Financial institutions (bank, insurance), National Standard Setter, NGO, Others, Public authority, Unlisted non-financial corporations Lowest support from: Financial institution (other financial market participant, including pension funds and other asset managers), Rating agency and analysts
Relevant for majority of undertaking across the sectors?	Yes - DR is not sector specific. RAR of 82% Highest support from: Academic, Audit, Consumer, ESG, Financial (Insurance), National standard setter, Non-governmental, Other, Public authority, Rating agency, Trade unions. Lowest support from: Non-financial outside EU (0%), Unlisted non-financial.
Promoting alignment with international standards?	No - this aspect is not included in IFRS S1. RAR of 60% Highest support from: Academic, ESG, National Standard Setter, Trade unions, NGO Lowest support from: Unlisted non-financial corporations (0%), Non-financial corporation outside EU (0%), Financial institution (insurance), Business association
Operational complexity?	- Significant effort for companies to do the exercise of mapping main aspects of sustainability due diligence with the relevant disclosures as required in paragraph AG 55. Also, some aspects need to be clarified. - Involves coverage of value chain
To be made mandatory?	Yes
Possible simplification	Placeholder based on finalisation of CSDDD: A statement of compliance for companies applying the Corporate Sustainability Due Diligence (CSDD) directive. Burdensome / Rudimentary and vague. To be discussed as part of the due diligence paper
Phase-in recommendations	Proposal to postpone to year 2

ESRS 2 - IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities

Overall support rate (average across categories)	67% RAR Support: 29% No support: 15% No opinion: 56%
Key outcome of the consultation	Strong support from Public authority with 100%; as well as from other respondents with over 90% approval. Opposition from Non-financial corporation outside and inside EU with 36% and 37% and business association with 36%.
Reference to the CSRD	Article 19a, 2e Article 19a
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes, however, the requirements in the ESRS go beyond the CSRD requirements*. Without clear guidance on how to assess materiality under a double materiality approach, assessments by entities to identify their sustainability impacts, risks and opportunities may lack comparability. RAR of 74% Highest support from: Financial institutions (bank, insurance, others), NGO, Public authority, Trade unions, unlisted non-financial corporations Lowest support from: Academic, Consumer organization (0%), rating agency *(i.e. par.73 - acknowledgement of double materiality as the pivotal principle followed for the assesment, 74 c) explanation of the involvement of, and engagement with, (i)stakeholders... (ii) internal and external experts, AG 58. the undertaking should screen the ESRS for sustainability matters and structure them before performing the materiality assessment.....)
Relevant for majority of undertaking across the sectors?	Yes, this DR apply entities across sectors. RAR of 85% Highest support from: Audit, Consumer, Financial (Insurance & Other), Non-financial outside EU, Public authority, Rating agency, Trade unions. Lowest support from: Academic, Non-financial EU.
Promoting alignment with international standards?	Yes. GRI 3-1, require undertakings to a) describe the processes they have followed to determine material topics. The TCFD recommends disclosing information on an undertaking's processes for identifying and assessing climate-related risks. Requirement 3 of CDSB's Reporting Framework provides that undertakings should explain processes used to identify, assess and prioritise the risks and opportunities, including any methods or tools used. Par. 26 of the IFRS S1 ED requires entities to disclose the processes they use to identify sustainability related risks and popportunities. RAR of 45% Highest support from: Public authority, Trade unions, NGO Lowest support from: Financial institution (insurance) (0%), National Standard Setter (0%), Non-financial corporation outside EU (0%), Unlisted non-financial corporations (0%), Business association (13%)
Operational complexity?	Value chain data
To be made mandatory?	YES - CSRD requirement
Possible simplification	Simplification of the data / possible elimination of some paragraphs that are redundant (especially in AG) Clarifications on implementation of double materiality to be included in Set 1. More AG in future sets. Cost/benefit rating particularly negative: need to simplify (without compromise on content) Consolidate elements on the process into ESRS 1 as part of guidance on materiality assessment Better reference to the content of UN guiding princ., OECD guidelines and GRI universal standards ☑
Phase-in recommendations	No phase in appropriate

ESRS 2 - IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to

Overall support rate (average across categories)	67% RAR Support: 27% No support: 14% No opinion: 59%
Key outcome of the consultation	Strong support from Academic and Trade unions with 100%; as well as from other respondents with over 80% approval. Opposition from Unlisted non-financial corporation with 36%, Rating agency with 33%, Non-financial corporation outside and inside EU with 30% and 32% and business association with 28%.
Reference to the CSRD	Article 19a, 2e Article 19a, 2f
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	In general yes. However, the CSRD mentions that there should be information related to impacts and risks in the short, medium and long-term horizon, as applicable, but there is not an explicit reference to this neither in the main body of IRO 2 nor in the AG. Such explicit reference is included in the AG of IRO 3. Without clear guidance on how to assess materiality under a double materiality approach, assessments by entities to identify their sustainability impacts, risks and opportunities may lack comparability. RAR of 74% Highest support from: Academic, Financial Institutions (bank, insurance and others), NGO, Others, Trade unions Lowest support from: Non financial corporation inside EU, Rating agency and analysts (0%)
Relevant for majority of undertaking across the sectors?	Yes, this DR apply entities across sectors. RAR of 85% Highest support from: Academic, Financial (Insurance & Other), Non-financial outside EU, Non-governmental, Rating agency, Trade unions. Lowest support from: Business association, Non-financial EU.
Promoting alignment with international standards?	Yes. Par. 15 of the IFRS S1 ED requires entities to disclose entities their sustainability related risks and opportunities as well as the effects on business model, strategy, performance, position and CF RAR of 47% Highest support from: Academic, Rating agency, Trade unions, Financial institution (other) Lowest support from: Business association (7%), Financial institution (insurance) (0%), National Standard Setter (0%), Non-financial corporation outside EU (0%), Unlisted non-financial corporations
Operational complexity?	Value chain data Comments rebuttable presumption paragraphs and references
To be made mandatory?	YES - CSRD requirement
Possible simplification	Merge IRO 2 and IRO 3 / Possible simplifications 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
Phase-in recommendations	No phase in appropriate

ESRS 2 - IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level)

Overall support rate (average across categories)	71% RAR Support: 27% No support: 12% No opinion: 61%
Key outcome of the consultation	Strong support from Academic, Public authority and Trade unions with 100%; as well as from other respondents with over 90% approval. Opposition from Rating Agency with 31%, 37% from business association and 40% from non-financial corporation.
Reference to the CSRD	Article 19a, 2e Article 19a, 2f
ESRS 2 including AGs support a fair representation of the topic required by the CSRD including the characteristics of quality ?	Yes. Without clear guidance on how to assess materiality under a double materiality approach, assessments by entities to identify their sustainability impacts, risks and opportunities may lack comparability. RAR of 78% Highest support from: Academic, Financial institution (insurance and others), National Standard Setter, NGO, Trade unions, Unlisted non-financial corporations, Others, Lowest support from: Business association, Rating agency and analysts (0%)
Relevant for majority of undertaking across the sectors?	Yes, this DR apply entities across sectors. RAR of 78% Highest support from: Academic, Financial (Insurance & Other), National standard setter, Non-governmental, Other, Trade unions. Lowest support from: Business association, ESG, Non-financial (EU & outside), Rating agency, Unlisted non-financial.
Promoting alignment with international standards?	Yes. Par. 15 of the IFRS S1 ED requires entities to disclose entities their sustainability related risks and opportunities as well as the effects on business model, strategy, performance, position and CF RAR of 61% Highest support from: Academic, Non-financial corporation inside EU, Trade unions, NGO Lowest support from: Financial institution (insurance) (0%), Business association (29%)
Operational complexity?	Value chain data
To be made mandatory?	YES - CSRD requirement
Possible simplification	Merge IRO 2 and IRO 3 / Possible simplification - see Comments on IRO2
Phase-in recommendations	No phase in appropriate