

ENVIRONMENT - EFRAG SECRETARIAT ANALYSIS OF THE INDIVIDUAL DRs

ESRS E4 – SUMMARY

DR	DR Name	Avg RAR	Key outcome of the consultation	CSRD ref.	DR including AGs - fair representation in cl. characteristics of quality?	Relevant across sectors?	Alignment with international standards?	Operational complexity?	Always Material?	Possible Simplification	Prioritisation Phase in of recommendation	TEG decision
E4 - 1	Transition plan in line with the targets of no net loss by 2030, net gain from 2030 and full recovery by 2050	Average RAR of 51%	1/DR could be moved to sector specific 2/Alignment with EU Biodiversity Strategy and Post 2020 Biodiversity Strategy 3/Lack of clarity in DR 4/Scope on value chain unclear 5/Difficulty in obtaining data (especially along the value chain) 6/Lack of flexibility	Not a direct reference to biodiversity net loss (except for recital 1), however biodiversity is a sustainability matter to be covered and action plans are a reporting area to be covered	RAR of 55% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), NFC with securities listed on EU regulated markets (14%), BA (16%). Strong support from Academic/Research Institutions (100%). DR and AGs respect quality characteristics. Add AG on Convention Biological Diversity CBD-goals.	No, with a RAR of 38%. Disagreement from National Standard Setter (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (16%), Insurance (17%) DR could potentially be moved to sector specific	41% RAR with disagreement from Banks (0%), Insurances (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (7%), NFC with securities listed on EU regulated markets (17%). Strong support from Academic/Research Institutions (100%). Alignment depends on evolution of frameworks such as the post-2020 Global Biodiversity Framework and EU Biodiversity Strategy post 2020 (in process).	1/ Value chain data 2/ Non mature calculation methodology	No, but the Convention Biological Diversity (CBD)-goals will apply to the entire economy net zero. Also, it is likely that many firms underestimate their exposure to biodiversity and ecosystems-related dependencies or are likely only partially aware of their impacts .	1/ Phase in if DR remains at sector agnostic level 2/ Possibility to move to sector specific 3/ Add additional AG on definitions CBD-goals	52% RAR for prioritization with opposition from NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%) and BA (11%). Strong support from Academic/Research Institutions (100%). Phase in not needed, if DR is moved to the sector-specific level.	1/ Keep it at sector-agnostic with reference to high impact sectors (as variant of moving DR to sector- specific) 2/A adding in ESRS 2 SBM 1 35 (c) or SBM 3 44 a, a formulation on transition plans across E standards (CSRD and relevancy across all topical standards). Actions: 1/ Delete from E 4 2/ Move transition plans DRs across E standards in ESRS 2 with formulation addressing high impact sectors.

E4 – 2	Policies implemented to manage biodiversity and ecosystems	Average RAR of 63%	1/Granularity 2/Relevance to all sectors 3/Lack of clarity of some definitions and metrics 4/High cost and difficulty in obtaining data along the value chain 5/Duplication of Information with other ESRS 6/ Need to align with International Standards that are not finalised. 7/ positive that social impact is integrated.	In CSRD biodiversity is a sustainability matter to be covered and policies are a reporting area to be covered. CSRD recitals (1), (9) and (11)	Yes with RAR of 62% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (29%), BA (30%). Strong support from Academic/Research Institutions (100%) and Audit firms (88%) E4-2 respects quality characteristics. Suggestions to add some definitions and simplify part of the text.	Yes, with a RAR of 57%. Disagreement from NFC with securities listed outside EU regulated markets (0%), Insurers (17%), BA (25%), NFC with securities listed on EU regulated markets (31%). The DR is relevant across sectors. Disclosures subject to material impacts, dependencies, risks and opportunities.	Partially with 44% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (6%), NFC with securities listed on EU regulated markets (31%). Strong support from Academic/Research Institutions (100%) and Audit firms (75%). Yes, alignment is respected but TNFD is not yet finalized: adjustments needed, e.g. on definitions.	1/ Value chain data missing (downstream) 2/ Missing definitions 3/ Operational burden	Yes, SFDR PAI indicators 10, 11, 15, 14 1. and 2. of Table 2 of Annex 1	1/ Simplification of text 2/Narrower value chain 3/ Additional definitions	60% RAR for prioritisation with opposition from NFC with securities listed outside EU regulated markets (0%), BA (16%), National Standard Setter (25%), NFC with securities listed on EU regulated markets (25%), Banks (33%). Strong support from Academic/Research Institutions (100%). Recommended to include in Year 1	No discussions. Actions: As per the analysis of individual DRs (Template 2): 1/ Simplification of text 2/ Narrow value chain 3/ Add definitions
E4 – 3	Measurable targets for biodiversity and ecosystems	Average RAR of 61%	1/Lack of flexibility 2/Alignment with international standards that are not finalised 3/Lack of uniformity in measures 4/Relevancy of thresholds 5/Definitions missing 6/Need to define interactions with other ESRS	In CSRD biodiversity is a sustainability matter to be covered and targets are a reporting area to be covered. CSRD recitals (1), (9) and (11)	Yes with RAR of 74% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), National Standard Setter (40%). Strong support from Academic/Research Institutions (100%), Public authorities/regulators/supervisors (100%), Audit firms (86%). DR and AGs respect quality characteristics. Suggestions to add some clarifications in definitions.	Yes, with a RAR of 57%. Disagreement from NFC with securities listed outside EU regulated markets (0%), Insurers (17%), BA (25%), NFC with securities listed on EU regulated markets (31%). The DR is relevant across sectors. Disclosures subject to material impacts, dependencies, risks and opportunities.	42% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (12%), NFC with securities listed on EU regulated markets (23%). Strong support from Academic/Research Institutions (100%). Yes, alignment is respected but TNFD is not yet finalised: adjustments needed.	1/ Lack of data 2/ Non mature methodologies 3/ International frameworks non mature alignment and definitions	No. To be reported if material as a result of materiality assessment of E4 building on ESRS 2 IRO1/ IRO2	1/ Add that if the undertaking has not established targets on biodiversity, it has simply to state so and why (in connection with the outcome of materiality assessment) and if there are plans for the future. 2/Clarifications and alignment of definitions	67% RAR for prioritization with opposition from Insurers (0%), National Standard Setter (25%), NFC with securities listed on EU regulated markets (25%), Banks (33%), BA (41%). Strong support from Academic/Research Institutions (100%). Recommended to include in Year 1	Discussed under 2) TNFD alignment. Decisions: 1/ elaborate more explicitly the concept of interactions across Environmental standards, E-2 to ES, where for now this is not clearly specified. 2/ alignment of metrics with TNFD: process (pending) Actions: As per the analysis of individual DRs (Template 2): 1/ elaborate interactions across Environmental standards, E-2 to ES. 2/Clarifications and alignment of definitions

E4 – 4	Biodiversity and ecosystems action plans	Average RAR of 55%	1/Suggestion to postpone DR in relation to TNFD 2/Granularity/Reduce scope 3/Confidential information 4/Add Taxonomy link 5/Lack of precisions on targets 6/Operational burden 7/ NGOs underline importance of DR	In CSRD biodiversity is a sustainability matter to be covered and policies are a reporting area to be covered. CSRD recitals (1), (9) and (11)	Yes, with RAR of 63% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (21%), BA (30%). Strong support from Academic/Research Institutions (100%), Audit firms (88%). DR and AG respect quality characteristics. Suggestion to move some parts of the DR to AG.	To a certain extent, with a RAR of 50%. Disagreement from Insurers (0%), Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (19%), Unlisted NFC (25%), BA (35%). The DR is relevant across sectors. Disclosures subject to material impacts, dependencies, risks and opportunities.	Yes with 51% RAR with disagreement from Insurers (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), banks (12%), NFC with securities listed on EU regulated markets (23%). Strong support from Academic/Research Institutions (100%), Audit firms (75%). Yes, alignment is respected but TNFD is not yet finalised: adjustments needed.	1/ Lack of data/value chain 2/ Too granular 3/ Operational burden 4/Confidentiality	No. To be reported if material as a result of IRO assessment.	1/ Simplification of text 2/ Move parts to AGs	52% RAR with opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (7%), BA (17%), National Standard Setter (25%), Banks (33%). Strong support from Academic/Research Institutions (100%). Recommended to include in Year 1	Discussed under 2) TNFD alignment. Decisions: 1/ align with comments by TNFD on definitions Actions: As per the analysis of individual DRs (Template 2): 1/ Simplification of text and align with TNFD 2/ Move parts to AGs
E4 – 5	Pressure metrics	Average RAR of 55%	1/Granularity 2/Missing focus on risk mitigation 3/Need for more detailed metrics 4/Alignment with Taxonomy / SFDR 5/Scope is too wide 6/Consistency with International Standards (not finalised) 7/Suggestion of a phased-in approach 8/Clarification on the interaction	In CSRD biodiversity is a sustainability matter to be covered and metrics are a reporting area to be covered.	RAR of 56% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (14%), BA (15%), Insurers (17%), Other (25%). Strong support from Academic/Research Institutions (100%), Public authorities/regulators/supervisors (100%), Audit firms (88%).	Yes, with a RAR of 59%. Disagreement from Insurers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (13%), BA (20%), Unlisted nfc (25%). Strong support from Academic/Research Institutions (100%), Public authorities/regulators/supervisors (100%), Audit firms (70%).	45% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (24%). Strong support from Academic/Research Institutions (100%), Audit firms (86%). Yes, alignment is respected but TNFD is not yet finalised: adjustments needed.	1/ Alignment with non mature EU (taxonomy) international frameworks 2/ Lack of quantitative data 3/ Lack of methodologies and metrics	YES: SFDR indicator 7 of Table 1 of Annex 1	1/ Simplify text by merging and combining E4-5, E4-6 and E4-7 2/ Interaction with E1, E2, E3 and E5	44% RAR for prioritization with opposition from BA (0%), Banks (0%), Insurers (0%), National Standard Setter (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Other (20%), Unlisted NFC (25%), Audit firm, assurance provider and/or accounting firm (30%). Strong support from Academic/Research Institutions (100%). DR merged into E4-6.	1/Merge with E 4-6 (Impact metrics) for simplification and alignment with GRI and TNFD comments Actions: 1/ Merge and combine E4-5, and E4-6 as a matrix 2/ Result would consist of a matrix that combines impact drivers and pressure metrics. 3/ The DR with metrics and KPI's is being finalised and will be shared with topical leaders in E as soon as possible.(pending) 4/ Add definitions in Annex A where relevant.

			with other ESRS is needed 9/Missing impact drivers		DR to be merged into E4-6 of the ED.	This DR is applicable only when the IRO assessment has identified as material a given impact driver. The DR is relevant across sectors.						
E4 – 6	Impact metrics	Average RAR of 50%	1/ Too granular (usability of info) but no clear definitions 2/ Lack of data and methodology 3/Not mature as TNFD and conceptual framework not developed and not aligned to ISSB 4/ Simplify with list of sensitive location and move to E4-4 5/ NGOs underline importance of DR.	In CSRD biodiversity is a sustainability matter to be covered and impacts are a reporting area to be covered. CSRD recitals (1), (9) and (11).	Yes with RAR of 60% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (14%), Insurers (17%), BA (20%). Strong support from Academic/Research Institutions (100%), Public authorities/regulator s/supervisors (100%), Audit firms (100%). DA and AG respect quality characteristics. Suggestion to simplify by merging E4-5 and E4-6.	No, with a RAR of 46%. Disagreement from Insurers (0%), Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (13%), BA (25%), Unlisted NFC (25%). Strong support from Public authorities/regulators/supervisors (100%), Academic/Research Institutions (67%), Audit firms (67%). The DR is relevant across sectors. The DR is applicable only when there are material impacts.	52% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (25%). Strong support from Academic/Research Institutions (100%), Audit firms (86%). Alignment with TNFD is respected. Suggestion to merge EDs and incorporate interactions with E1, E2, E3 and E5. Discussions are ongoing.	1/ Alignment with non mature EU (taxonomy) international frameworks 2/ Lack of quantitative data 3/ Lack of methodologies and metrics	Yes: combination of E4-5, E4-6 and E4-7 for SFDR PAI Indicator, 14, 15, 22 of Table 2 of Annex 1	1/ Simplify text by merging and combining E4-5, E4-6 and E4-7, as per GRI recommendation 2/ Interaction with E1, E2, E3 and E5 as well as social standards to be specified	42% RAR for prioritization with opposition from BA (0%), Banks (0%), Insurers (0%), National Standard Setter (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Audit firm, assurance provider and/or accounting firm (11%), Unlisted NFC (25%). Strong support from Academic/Research Institutions (100%). Recommended to include it in Year 1 Note: DR on metric measuring change in state may be added (simplifying 5 DR into 2).	1/Merge with E 4-6 (Impact metrics) for simplification and alignment with GRI and TNFD comments Actions: 1/ Merge and combine E4-5, and E4-6 as a matrix 2/ Result would consist of a matrix that combines impact drivers and pressure metrics 3/ The DR with metrics and KPI's is being finalised and will be shared with topical leaders in E as soon as possible.(pending) 4/ Add definitions in Annex A where relevant.
E4 – 7	Response metrics	Average RAR of 49%	1/ DR is too granular and burdensome due to lack of data and methodologies.		Yes with RAR of 56% with strong opposition from Other financial Market Participant, including pension	No, with a RAR of 39%. Disagreement from Insurers (0%), Other financial Market	Partially with 46% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed outside EU regulated markets		PARTIALLY: combination of E4-5, E4-6 and E4-7 for SFDR PAI Indicator, 14, 15,	1/To be deleted as per GRI and TNFD recommendation 2/Provision to be added in E4-1 to	40% RAR with opposition from Banks (0%), Insurers (0%), National Standard Setter (0%), NFC with securities listed outside EU regulated markets (0%), BA (6%), NFC	1/ DR to delete. 3/ Provisions to be added E4-2 to E4 –4 Actions: 1/To be deleted

			<p>2/ TNFD, global objectives and EU taxonomy not finalised: issue with alignment.</p> <p>3/ Overlaps with E4-4, move or phase-in.</p>		<p>funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), BA (15%), NFC with securities listed on EU regulated markets (23%), Other (33%). Strong support from Academic/Research Institutions (100%), Audit firms (100%).</p> <p>E4-7 already covered via E4-1 to E4-4. Only requirement to be added to measure progress against implementation.</p>	<p>Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), BA (25%), Unlisted NFC (25%), NFC with securities listed on EU regulated markets (27%)</p> <p>The DR is applicable only where material impacts are identified.</p>	<p>(0%), Unlisted NFC (0%), ba (7%), NFC with securities listed on EU regulated markets (9%). Strong support from Academic/Research Institutions (100%), Audit firms (71%).</p>	<p>22 of Table 2 of Annex 1</p>	<p>E4-4 to measure progress</p>	<p>with securities listed on EU regulated markets (7%), Audit firm, assurance provider and/or accounting firm (11%), Other (25%), Unlisted NFC (25%). Strong support from Academic/Research Institutions (100%).</p> <p>DR to be deleted (merged in E4-7).</p>	<p>2/ Add sentences on monitoring progress against targets across E4-2 to E-4-4 by reinforcing what is already embedded in ESRS 1 (i.e., reporting against progress on implementing what is disclosed in E4-2 to E4-4)</p>	
E4 – 8	<p>Biodiversity-friendly consumption and production metrics</p>	<p>Average RAR of 60%</p>	<p>1/ Missing definitions and clarity on metrics.</p> <p>2/ EU taxonomy not finalised, issues of alignment.</p> <p>3/ Concerns on third party-certifications and assurance.</p> <p>4/ Postpone or move it to sustainable products.</p> <p>5/ Some NGOs support mandatory.</p>		<p>RAR of 62% with strong opposition from NFC with securities listed outside EU regulated markets (0%), BA (12%), NFC with securities listed on EU regulated markets (27%), Other (33%). Strong support from Academic/Research Institutions (100%), Audit firms (88%).</p> <p>DR and AG respect good representation</p>	<p>Yes, with a RAR of 60%. Disagreement from Insurers (0%), National Standard Setter (40%), Audit firm, assurance provider and/or accounting firm (44%), NFC with securities listed on EU regulated markets (46%)</p> <p>DR to be moved to Sector Specific</p>	<p>45% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (20%). Strong support from Academic/Research Institutions (100%), Audit firms (86%).</p> <p>EU taxonomy postponed triggering difficulties in alignment.</p>	<p>1/ Unclear definitions</p> <p>2/ Assurance, third party verification not always applicable</p> <p>3/ Competition sensitive info</p> <p>4/ Risk of greenwashing</p>	<p>No</p>	<p>Move to sector-specific</p>	<p>24% RAR with opposition from BA (0%), Banks (0%), Insurers (0%), Other financial Market Participant, including pension funds and other asset managers (0%), National Standard Setter (0%), NFC with securities listed outside EU regulated markets (0%), Trade unions or other workers representatives (0%), NFC with securities listed on EU regulated markets (8%), Audit firm, assurance provider and/or accounting firm (11%), Unlisted NFC (25%), Other (33%)</p> <p>Recommend to move to sector-specific standards or future ESRS G on Sustainable Products.</p>	<p>1/ Delete</p> <p>2/ Some members suggests to included in possible future standards for sustainable products in G.</p> <p>2/ Some members propose that the disclosure on biodiversity friendly products and in general green or sustainable products could be introduced under ESRS 2 on strategy with a specification that when an undertaking has products that it considers green or sustainable, the undertaking shall be able to disclose.</p> <p>Actions:</p> <p>1/ Delete</p> <p>2/ TEG to reflect on possibility to move to future ESRS G Sustainable Products</p> <p>3/ TEG to reflect on disclosure for</p>

												sustainable products in ESRS 2 as part of strategy
E4 – 9	Biodiversity offsets	Average RAR of 62%	1/ Conceptual problems and missing definitions (greenwashing?) 2/ Clarifications needed 3/ Deprioritise, postpone, not mature 4/ Move to sector specific		RAR of 62% with strong opposition from Banks (0%), Unlisted NFC (0%), Insurers (20%). Strong support from Academic/Research Institutions (100%), Audit firms (71%). DR requires definitions and concepts that are currently not mature. Recommend deleting.	Yes, with a RAR of 70%. Disagreement from Insurers (0%), National Standard Setter (40%), Banks (50%), Unlisted NFC (50%) The DR is relevant across sectors.	63% RAR with disagreement from Banks (0%), Insurers (0%), ESG reporting initiative (50%), Rating agency and analysts (50%) TNFD does not provide guidance on biodiversity offsets.	1/ Conceptual problems 2/ Lack of EU/ international definitions 3/ EU taxonomy not finalised	No	Delete	42% RAR with opposition from Banks (0%), Insurers (0%), Other financial Market Participant, including pension funds and other asset managers (0%), National Standard Setter (0%), Trade unions or other workers representatives (0%), Audit firm, assurance provider and/or accounting firm (22%), NFC with securities listed on EU regulated markets (38%). Strong support from Academic/Research Institutions (100%). Recommend deleting	To delete from E 4 and use same approach as climate Actions: 1/ Delete
E4 – 10	Financial effects from biodiversity -related impacts, risks and opportunities	Average RAR of 53%	1/ Scope too broad 2/ Not available scenarios, quantitative data 3/ Not mature	In CSRD biodiversity is a sustainability matter to be covered and financial effects are a reporting area to be covered.	RAR of 50% with strong opposition from Other financial Market Participant, including pension funds and other asset managers (0%), NFC with securities listed outside EU regulated markets (0%), NFC with securities listed on EU regulated markets (8%), BA (16%), Insurers (25%), National Standard Setter (40%). Strong support from Academic/Research Institutions (100%), Audit firms (100%). In order to improve the quality characteristics suggestion is to move to set 2.	Yes, with a RAR of 62%. Disagreement from Insurers (0%), Other (33%), NFC with securities listed on EU regulated markets (38%). Strong support from Academic/Research Institutions (100%). DR to be moved to sector-specific standards.	45% RAR with disagreement from Banks (0%), Insurers (0%), NFC with securities listed on EU regulated markets (0%), NFC with securities listed outside EU regulated markets (0%), Unlisted NFC (0%), BA (13%), Other (33%). Strong support from Academic/Research Institutions (100%), Audit firms (67%). Alignment with International Standards is difficult to achieve. It might be prudent to move to set 2.	1/ Methodologies are not enough mature 3/ Lack of clear metrics	No	1/ Use of ranges 2/ Move to sector specific standards 3/ Issue paper has been prepared on how / whether to disclose on financial effects across all environmental standards	36% RAR with opposition from Audit firm, assurance provider and/or accounting firm (0%), BA (0%), Banks (0%), Insurers (0%), NFC with securities listed outside EU regulated markets (0%), Other (0%), NFC with securities listed on EU regulated markets (7%), Unlisted NFC (25%) Recommend moving to sector specific Set 2. Feasible to be more precise in providing guidance on how to disclose.	Decision depends on the final decisions that will be taken on Financial effects across all environmental standards.

Other TEG decisions

<p>Mitigation hierarchy (E4 – 2 to E4 – 6)</p>	<p>1/ TEG agrees with the importance of the concept. 2/ To be added as a manner of classifying undertakings actions and efforts across all E (environmental) standards. It should not aim at prescribing behavior. 3/ One member expressed reservations.</p> <p>Actions: 1/ Mitigation hierarchy to be added for classifications purposes across all E (environmental) standards.</p>
<p>Convention on Biological Diversity (E4 – 2 to E4 – 4)</p>	<p>1/ Refer to CBD in a general manner (due to time mismatch as international negotiations are due in December). 2/ Incorporate reference to international and EU biodiversity objectives, giving priority to EU targets</p> <p>Actions: 1/ add formulation on CBD and EU targets</p>
<p>Targets and local thresholds were taken into consideration (E4 – 2 to E4 – 4)</p>	<p>1/ Defining thresholds at local level should be kept as a methodological guideline for identifying relevance, i. e. biodiversity sensitive area. The thresholds could be set for the purpose of materiality assessment at sector- agnostic level. 2/ to be added in application guidelines and methodology but not part of the DR (avoid target by target reporting for multi-sites company). 3/ Investigate if disaggregation in reporting shall be introduced in sector-specific standards.</p>

	<p>Actions: 1/ add thresholds at local level as methodological guideline for identifying relevance, i. e. biodiversity sensitive area. In AGs or materiality assessment.</p>
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