THE EUROPEAN SUSTAINABILITY REPORTING MOMENTUM

REPARIS FOR SMEs CONFERENCE

24 May 2024, Ulcinj, Montenegro,

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DISCLAIMER

The views expressed in this presentation are those of the presenter, except where indicated otherwise. EFRAG positions, as approved by the EFRAG SRB, are published as comment letters, discussion or position papers, or in any other form considered appropriate in the circumstances.





OVERVIEW

- INTRODUCTION
- THE KEY FEATURES OF THE CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD)
- ESRS SECTOR AGNOSTIC
- CURRENT ACTIVITIES
- DEVELOPMENTS AHEAD



Introduction



EFRAG – EUROPE'S VOICE IN CORPORATE REPORTING

- Private not-for-profit established in 2001
- Encouraged by the European Commission to serve the public interest
- Member organisations: European Stakeholders Organisations,
 National Organisations and Civil Society Organisations
- EFRAG's activities are organised in two pillars:
 - A Financial Reporting Pillar
 - A Sustainability Reporting Pillar
- Provides technical advice to the European Commission in the form of draft European Sustainability Reporting Standards and supports the effective implementation of ESRS.





THE KEY FEATURES OF THE THE CSRD*

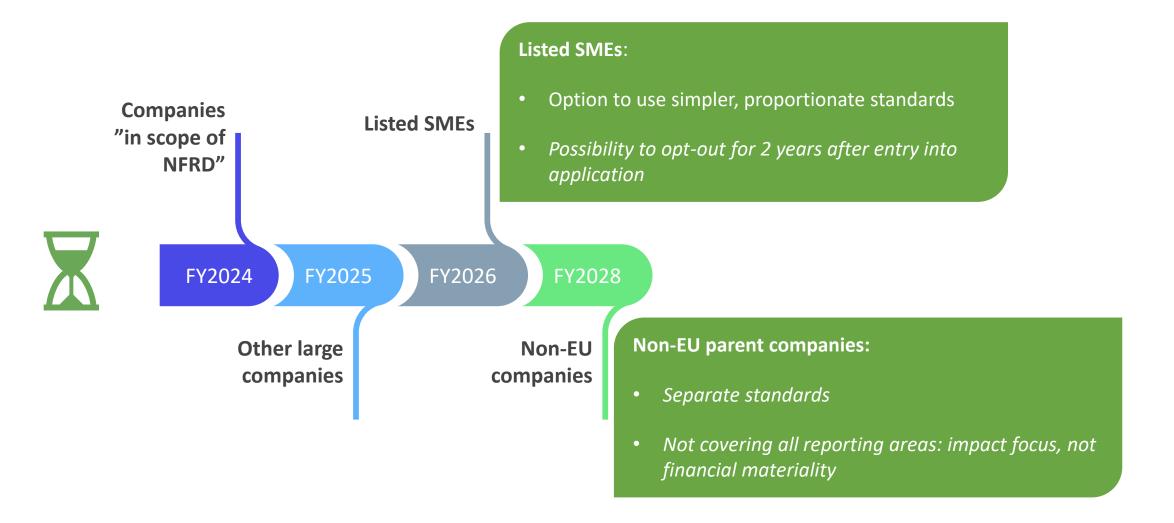


CSRD: SCOPE

- Groups and individual entities. Subsidiary exemption mechanism defined
- All listed companies (except micro-enterprises) + all large companies that exceed 2/3 of the following
 - Balance sheet total: > EUR 20M
 - Net revenue: > EUR 40M
 - > 250 average number of employees during the FY
- Listed SMEs + Small Non-Complex FI + captive insurance/reinsurance
- Voluntary regime for other SMEs (not included in the Delegated Act)
- Non-EU companies with branches or subsidiaries in the EU above certain thresholds (150 mio + branches)



CSRD: PHASED-IN ENTRY INTO APPLICATION



CSRD: KEY FEATURES





Mandating the use of European Sustainability Reporting Standards (ESRS) developed by EFRAG and adopted by the EC via delegated acts - comprehensive coverage of sustainability matters: E, S & G



A key concept: double materiality (impacts and financial risks/opportunities)



Location and timing of reporting: in the management report, i.e., at the same time as financial statements



Mandatory limited assurance to start with, moving to reasonable assurance by the end of the decade



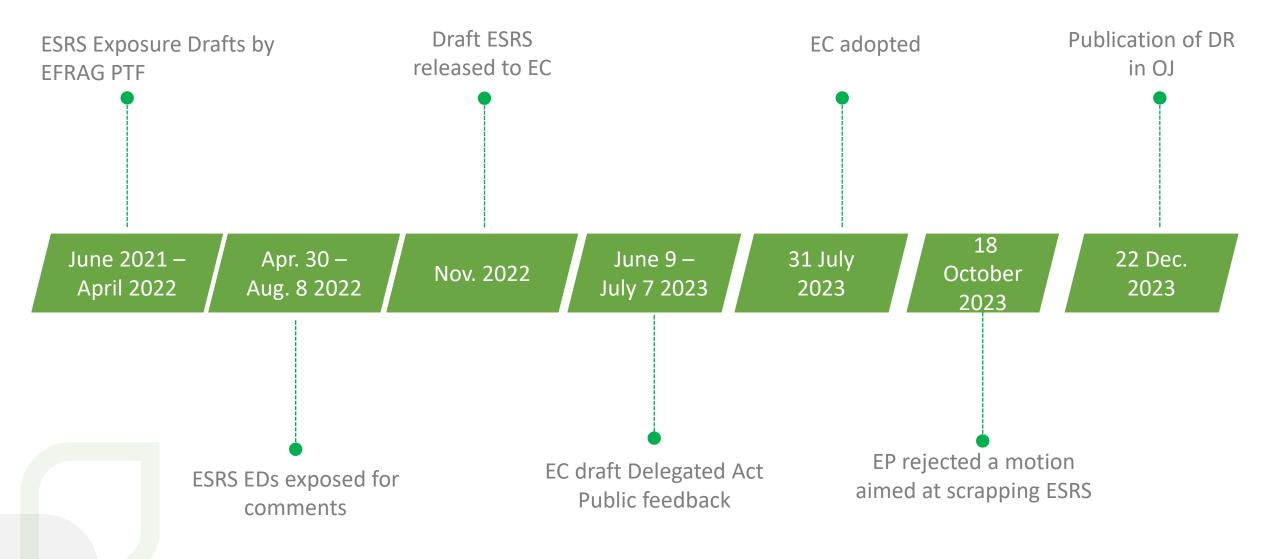
Both human and machine-readable using European Single Electronic Format (ESEF) from 2025/2025 (timing to be confirmed) – EFRAG tasked to develop the draft XBRL taxonomy



ESRS SECTOR AGNOSTIC

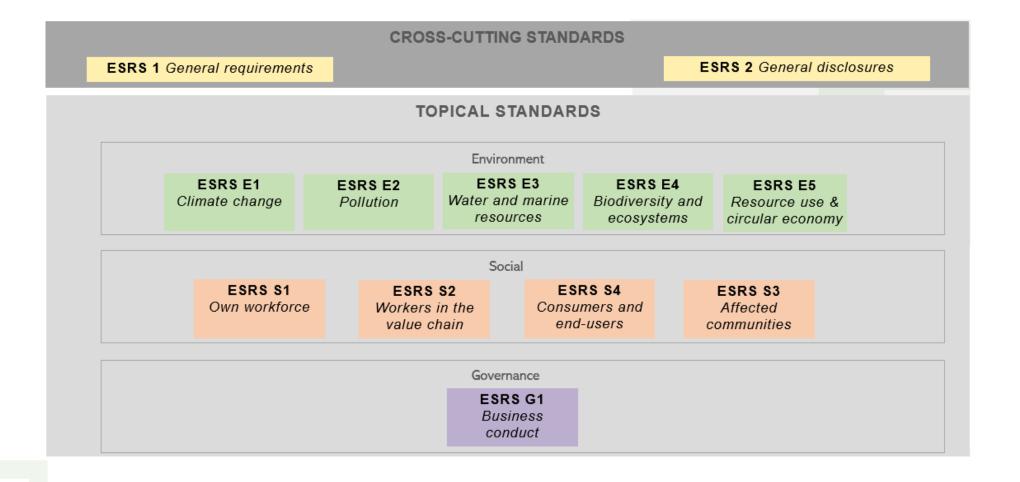


THE SECTOR AGNOSTIC STANDARDS - TIMELINE



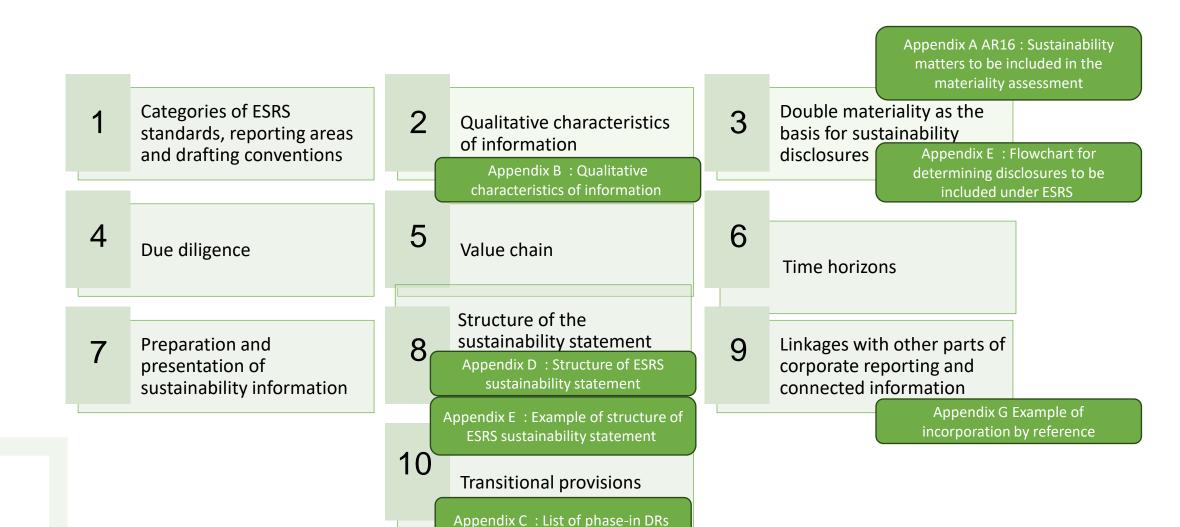
THE FIRST SET OF SECTOR AGNOSTIC ESRS





ESRS 1 General requirements —'how to report'





ESRS 2 General Disclosures- 'what to report'



GENERAL CHARACTERISTICS

BP-1: General basis for preparation

BP-2: Disclosures in relation of

specific circumstances

GOVERNANCE

GOV-1: The role the admin., man. and superv. bodies

GOV-2: Information provided to and sustainability matters addressed by the bodies

GOV-3: Integration of incentive schemes

GOV-4: Statement on sustainability due diligence

GOV-5: Risk management over sustainability reporting

STRATEGY

SBM-1: Market position, strategy, bus. model(s), value chain

SBM-2: Interests and views of stakeholders

SBM-3: Material impacts, risks and opportunities and their

interaction with strategy and business model

IMPACTS, RISKS & OPPORTUNITIES MANAGEMENT

IRO-1: **Description of the processes** to identify

material impacts, risks and opportunities

IRO-2: Disclosure Requirements in ESRS

MINIMUM DISCLOSURE REQUIREMENTS

Policies MDR-P Actions MDR-A

Targets
MDR-T



Minimum disclosure requirement for each material matter *

Metrics MDR-M



^{*} If the undertaking has not defined policies, actions or targets, it may disclose this



ESRS: THE PIVOTAL ROLE OF THE MATERIALITY ASSESSMENT



Sustainability statements shall reflect all material impacts, risks and opportunities (IROs): under an objective approach with thresholds. Thus, not all sector agnostic standards may be applicable to an undertaking.



Reporting entity to implement a rigorous materiality assessment process to determine material IROs (including understanding of its value chain). This will be subject to audit.

DOUBLE MATERIALITY: DEFINITIONS



Materiality assessment

- Process for determination of the information to be included in the sustainability statement. It has two steps:
 - identification of the **matters that are material**, supported by the list of matters (topics/sub-topics/sub-sub topics) in AR 16 of ESRS1; and
 - definition of the **information to be reported per each material matter**, on the basis of the requirements in topical standards (ESRS E1/E5, S1/4, G1).

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Impact materiality



AND/ Financial materiality



A matter is "material"

 material actual or potential, positive or negative impacts over short-, medium- and long-term

• information material for **primary users of general-purpose financial reports** in making decisions relating to providing resources to the entity

 risks or opportunities that could be reasonably be expected to have/have a material influence on financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- or long-term

Information reported

- Policies, Actions and Targets in place to manage the material matter
- Datapoints in *Metrics* that the undertakings assesses to be material

DOUBLE MATERIALITY: EXAMPLES







EXAMPLE OF RISK

An oil and gas undertaking identifies a material negative impact that arises from not performing consultations or reaching an agreement with indigenous' people to use their land for the extractions and to relocate the community. At the reporting date, the undertaking does not expect that the indigenous community will initiate protests. However, such indigenous community may at a later stage initiate protests that could halt the production of oil and gas at that site and cause material costs for the undertaking due to the days lost to production or the abortion of the project

EXAMPLE OF IMPACT

A manufacturing company discharges untreated wastewater containing chemicals into a nearby river. This causes water pollution, killing aquatic plants and wildlife and creating health issues to people using the river.





CURRENT ACTIVITIES



EFRAG NON AUTORITATIVE IMPLEMENTATION GUIDANCE



EFRAG ESRS Q&A platform





Access the regularly updated <u>Log of questions</u> submitted.



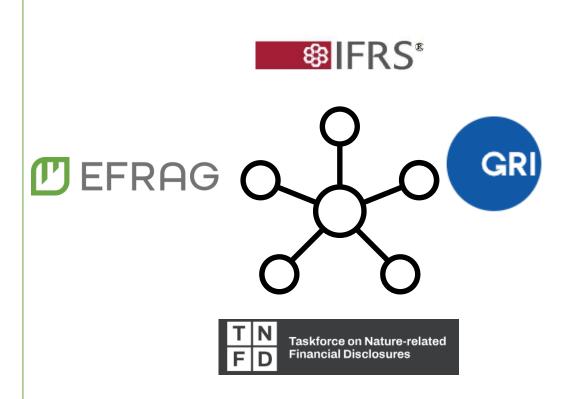
Update Q&A Platform 21 May 2024

Question relating to	Number of questions received since 24 October 2023
Cross-cutting	159
Environmental	124
Social	79
Governance	14
XBRL	11
VSME	1
LSME	0
Sectors	0
Others	54
Total	443

Interoperability maps



- To avoid double reporting
- Leveraging on the high-level of interoperability in the standards.
- Implementation support material issued jointly
- Illustration of the correspondence of detailed requirements in ESRS that correspond to the other standard, with clarification of differences in terminology and substance (if any)
- Paving the way to digital interoperability





DEVELOPMENTS AHEAD



SUSTAINABILITY REPORTING FOR SMES

Listed SMEs
LSME
Standard
(CSRD)

Legally binding Art. 29 c and Art. 19 a6

- SMEs between 10-250 employees (plus turnover and capital criteria) with securities listed [about 1.000 listed companies in EU]
- Small non-complex banks (about 2.300)
- Captive insurance and reinsurance (about 300)

Delegated Act

Voluntary
Standard VSME
(SMEs not in
CSRD scope)

Not legally binding but empowering tool

SMEs not listed [22 *million* including micro] outside CSRD scope that want to voluntary disclose

No Delegated Act. Aim: to help SMEs in taking the first steps in ESG reporting.

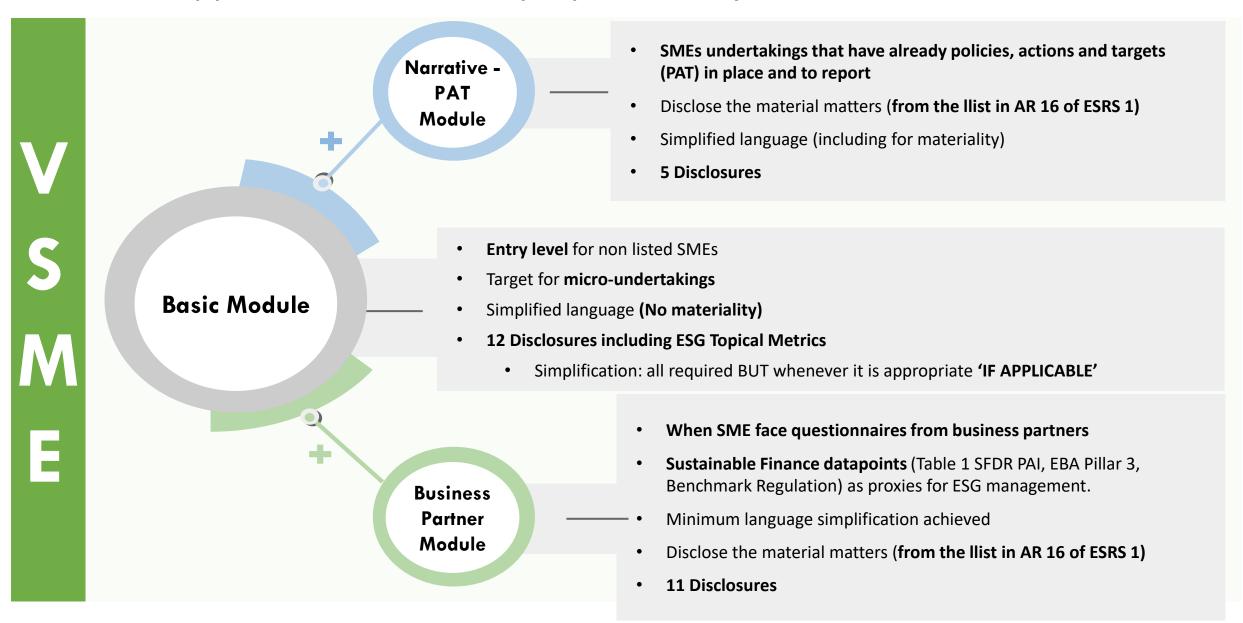
CSRD specifies reporting requirements for listed SMEs. Art 19 a(6) by way of derogation. This is a reduced list from the requirements that will apply to other companies under scope:

- a) A brief description of the undertaking's business model and strategy
- b) A description of the undertaking's <u>policies</u> in relation to sustainability matters
- c) The principal actual or potential <u>adverse</u>
 <u>impacts</u> of the undertaking with regard to
 sustainability matters, and any <u>actions</u>
 <u>taken</u> to identify, monitor, prevent,
 mitigate or remediate such actual or
 potential adverse impacts
- d) The principal <u>risks</u> to the undertaking related to sustainability matters and how the undertaking manages those risks
- e) Key <u>indicators</u> necessary to the disclosures referred to in points (a) to (d).

Consistency

Modular approach to maximise proportionality

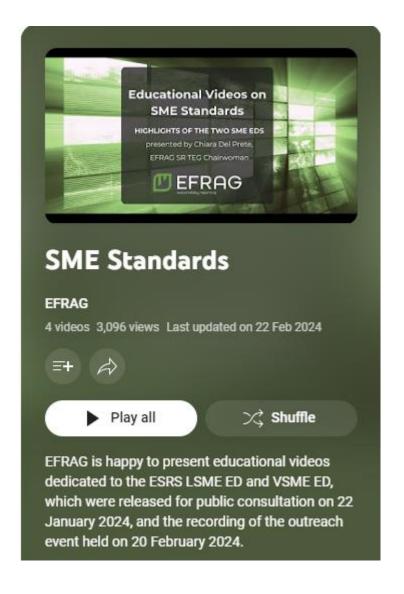




SME EXPOSURE DRAFTS AND EDUCATIONAL VIDEOS











INTRODUCTION TO SECTOR SPECIFIC ESRS

- Eleven workshops on SEC 1 (Standard-setting approach and classification standard) during February 2024
- Advisory panels for financial institutions (Banking, Capital Markets and Insurance) announced and kickoff meetings held
- SEC 1 and sector EDs on Oil and Gas as well as Mining, Quarrying and Coal Mining available in H2 2024
- Sector EDs for *Road transport* and *Textiles, accessories, jewellery and footwear* planned to be available in Q1 2025, but depends on resources
- Other high-impact sectors: preparation ongoing with SR TEG and SRB discussions in 2025 onwards
- V1 of FI sector standards planned for SR TEG discussion in December 2024/January 2025 and ED issuance in H2 2025



SECTOR COMMUNITY



- Community Sector Groups are constituted by stakeholders interested in the development of Sector ESRS (preparers and preparer organisations, etc.)
- Support the identification of relevant and important sustainability matters for each sector, provide input to the development of draft standards

EFRAG's sector-specific communities

Become a Friend of EFRAG



Entities can support EFRAG's mission and activities in the development of draft ESRS!

Advantages:

- Visibility on website
- Private meetings with the EFRAG high-level representatives
- Mention in Annual report
- Reserved seats at physical events
- Access to documents prior to publication
- A possible panelist position in EFRAG's events
- A possible EFRAG representation in the entities' events
- Use of "Friend of EFRAG" logo



Who to apply?

Send to <u>nominations@efrag.org</u> a description of your entity's mission and activities and a motivation statement in support of EFRAG' mission in its sustainability reporting activities.



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