PDF FORMAT

EFRAG

PUBLIC CONSULTATION SURVEY

DRAFT AMENDED ESRS

JULY 2025

Amended ESRS - Exposure Draft 2025 Public Consultation Survey

This document contains the public consultation survey questions. Please note, that the survey itself is provided with an online tool, which should be used to respond to it:

https://survey.alchemer.eu/s3/90874765/Amended-ESRS-Exposure-Draft-July-2025-Public-ConsultationSurvey

All documents and materials are available on the EFRAG webpage: https://www.efrag.org/en/amended-esrs

INTRODUCTION

Welcome to the EFRAG Survey on the Amended ESRS Exposure Drafts 2025! Please submit your answers by 29th September 2025 by clicking on the 'Submit' button at the bottom of the survey.

Please note that you can save the draft survey, and go back to it at a later time, by clicking on the 'Save and continue later' button in the top right corner of the page. EFRAG will only take into consideration surveys where the 'Submit' button has been used.
For any technical queries regarding the survey, please contact **efragsecretariat@efrag.org**

INTRODUCTION TO ESRS SIMPLIFICATION:

Building on CSRD 'Wave 1' feedback and based on the mandate from the European Commission, EFRAG is proposing a simplified set of European Sustainability Reporting Standards (ESRS), reducing datapoints by 57% while retaining the core objectives of the EU Green Deal.

IN A NUTSHELL: WHY AND HOW IS EFRAG SIMPLIFYING ESRS REPORTING

1. Combining two policy priorities: reducing the administrative burden and ensuring quality sustainability reporting

In the European Green Deal, the EU set out its ambition to become a decarbonised economy by 2050 and foster sustainable development for European businesses. To support this ambition, several pieces of legislation were adopted, including the Corporate Sustainability Reporting Directive (CSRD) and the related ESRS. Large public interest entities with more than 500 employees, which include publicly listed companies in the EU, were the first to report in line with the CSRD and ESRS for the reporting year 2024. Initial feedback from these companies and from those that will be subject to the CSRD and ESRS in the future, centred around the fact that the information required by the ESRS was too detailed and the reporting processes too complex.

To increase European competitiveness and reduce the administrative burden placed on companies, the European Commission (EC) decided to review European reporting legislation. This initiative, launched on February 26 2025, is also known as the 'Omnibus'. The EC tasked EFRAG, who drafted the initial ESRS, to significantly simplify the ESRS without compromising the objectives of the Green Deal and the much needed quality of reported data.

2. Gathering evidence: capitalising on a wealth of knowledge and experience

During the second quarter of 2025, EFRAG collected feedback to structure its simplification efforts. A survey gathered over 800 responses, many stakeholder events were organised, and interviews were held with a variety of companies, investors, and other stakeholders. The aim was to learn from their experience of implementing the ESRS or using the ESRS as input for decisions. The focus of EFRAG has not only been on datapoint reduction, but on a reduction in efforts required to comply with the CSRD and ESRS.

3. Elaborating simplified standards: levers of simplification and review of datapoints

EFRAG systematically used six 'top-down' levers of simplification to address sources of complexity:

1. Simplification of the Double Materiality Assessment (DMA) – the DMA is the process to prioritise sustainability topics for reporting: the amendments simplify the DMA process and documentation for audit purposes.

2. Better readability and conciseness of the sustainability statements: improved flexibility on how to organise the information, more emphasis on how the company manages its sustainability issues.

3. Elimination of the overlaps between general disclosures and topical standards: deleting most granular narrative requirements in topical standards.

4. Improved understandability, clarity and accessibility of the ESRS standards: voluntary disclosures eliminated, clarified language, various concepts are simplified, text is shortened.

5. Introduction of several burden-reduction reliefs: new flexibilities and reliefs have been included. For example, information does not have to be reported if it requires undue cost or efforts.

6. Enhanced interoperability with global reporting standards: various changes have been implemented to further enhance interoperability with other standards, in particular the IFRS Sustainability Disclosure Standards.

In parallel, EFRAG performed a critical 'bottom-up' review of all datapoints to prioritise direct relevance and usefulness in decision-making, with a focus on core data. This work results in a reduction of 57% in 'mandatory' datapoints (which are all to reported only if material). In addition, all 'voluntary' datapoints are eliminated. Counting both mandatory and voluntary datapoints, the total number is reduced by 68%. The length of the ESRS is reduced by over 55%.

The simplification will contribute to a significant overall reduction in reporting efforts.

4. Consulting stakeholders on draft simplified standards

As a next step, EFRAG is launching a public consultation today on the draft simplified Standards (exposure drafts) and welcomes your input. The consultation will run until the 29 September, and EFRAG will deliver its technical advice to the EC by the end of November.

INTRODUCTION TO THE QUESTIONNAIRE:

Context

This questionnaire gathers feedback on the 12 Amended ESRS Exposure Drafts ('Amended ESRS' or 'EDs' or 'the Amendments'). In accordance with EFRAG's Due Process Procedures, the purpose of this consultation is to gather feedback and comments from a variety of stakeholders. EFRAG is interested in getting feedback on whether the Amendments proposed in the ED achieve the desired outcomes in terms of simplification and whether EFRAG has appropriately reflected in the Amendments the suggestions collected in the public call for input and outreach program run in April and May 2025.

EFRAG is performing the simplification exercise following a specific mandate from the European Commission (EC) described in the Explanatory Memorandum ('EM') that accompanies the Omnibus proposal. The Amendments assume that the CSRD will be modified according to the Omnibus Proposal issued by the European Commission ('EC') in February 2025. Comments that go beyond the EFRAG simplification mandate, such as questioning the content of the CSRD or asking to modify the ESRS in a way that is not compatible with the simplification mandate, will not be considered.

The EDs are accompanied by a Basis for Conclusions which illustrate the reasoning of the EFRAG Sustainability Reporting Board ('SRB') and EFRAG Sustainability Reporting TEG ('SR TEG') in preparing the Amendments. The rationale for change at paragraph level in the 12 Standards can be found in the 'Log of Amendments per Standard' annex of the Basis for Conclusions ('BfC').

All the Exposure Draft documents and materials are accessible at this link
https://www.efrag.org/en/amended-esrs

Call for interest in participating to the cost benefit analysis on the simplification exercise

In parallel with the public consultation on the ESRS simplification, EFRAG has launched a cost-benefit analysis ('CBA') conducted by external consultants.
The purpose of this CBA is to assess the potential costs and benefits of the proposed simplifications to the ESRS.
For the analytical purpose of this CBA, in the coming weeks EFRAG will share the external consultants' CBA survey link. We kindly invite you to respond to the CBA survey as your input will be essential for the analysis.

Questionnaire instructions

This invitation to comment includes 30 questions (General feedback), in addition to those necessary to capture the profile of the respondent, and allows the respondent also to provide more detailed comments at level of Disclosure Requirement ('DR') or paragraph of the ED. It is structured in 3 parts:

Part 1. Profile of the respondent (always required)
Part 2. General feedback (respondents can choose the questions to which they reply) **Part 3**. Detailed feedback at level of DR or paragraph of the ED (optional).

Each part includes multiple questions. Except for part 1, you can select which questions you want to answer and skip the other questions in each part. Part 3 intends to collect granular feedback and it is optional. You are

invited to respond to Part 3 when you intend to comment on the simplifications implemented in a Disclosure Requirement (DR) or even paragraph of the Standards.

Respondents are kindly invited to avoid repeating the same comments in two or more parts/questions.

Each question asks if you AGREE / PARTIALLY AGREE AND PARTIALLY DISAGREE / DISAGREE with the proposals in the ED. In all cases, you are invited in your comments to explain why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any. The length each comment is of 300 words.

Please note that EFRAG only considers the surveys for which the submission procedure is completed and successful. You will receive an email confirming receipt of your response on the submission. We recommend you to check your spam folder when looking for the confirmation email.

EFRAG assumes that you give consent to publish your responses. Please select NO here if you do not want that your responses are made public.
(x) Yes

( ) No

PART 1: Information about the respondent: Q1 – Q10

1) Please enter the following information:*

Name: Matthies

Surname: Verstegen

Name of organisation: Dutch Federation of Pension Funds

2) Please enter your email*

_____

3) Which of the following stakeholder types do you represent?*

Company (Preparers)

( ) Preparer (non-financial institution preparing a sustainability report)

( ) Business association (other than association of financial institution) Users

( ) User (analyst, data provider, rating agency, etc.)

( ) National supervisory authority & regulator

( ) User Association

Financial Institutions

( ) Bank

() Asset manager/Investor

( ) Insurance

(x) Association of financial institutions

Other stakeholders

( ) Consultant (including software vendor)

( ) Other - please specify (required): _____*

( ) Auditor

( ) (National) standard setter

( ) NGO

( ) Academia

4) Preparers: Please disclose your company's revenue in EUR below (at group level, if applicable)*

Revenue: _____

5) Preparers: Please disclose your company's total assets in EUR below (at group level, if applicable)*

Total assets: _____

6) Preparers: Please select your company size by employees (at group level, if applicable)*

( ) Less than 1000 employees

( ) More than 1000 employees and less than 3000 (

) More than 3000 employees and less than 5000 d

( ) More than 5000 employees

7) Country of headquarters*

Netherlands

8) Preparers: Is your company in scope for the preparation of ESRS sustainability statements under the CSRD (adopted in 2022)? [Companies in scope: over 250 employees, €50 million in net turnover, or €25 million in total assets]*

( ) Yes – but the CSRD has not been transposed in the jurisdiction

( ) Yes - from 2024 and the relevant jurisdiction has transposed the CSRD

( ) Yes - from 2025 and the relevant jurisdiction has transposed the CSRD (

) Yes - from 2026 and the relevant jurisdiction has transposed the CSRD ( )

No

( ) No, but it is done/intended to do on voluntary basis

9) Preparers: Did your company prepare a sustainability statement for Financial Year 2024?*

( ) Yes, based on the ESRS Delegated Act published in 2023

( ) Yes, based on another sustainability standards or (national) legislation

( ) No

10) Preparers: Does your company also prepare or intend to prepare a sustainability statement under IFRS S1/S2?*

( ) Yes

( ) No

PART 2: GENERAL FEEDBACK: (Q10 – Q31) This part asks questions about:

(1) the main simplifications implemented,

(2) specific requirements for which EFRAG SRB members expressed reservations and remaining concerns, in the approval of the Exposure Drafts (EDs),

(3) overall feedback at standard level and

(4) any other comments.

The main simplifications implemented are grouped into "Levers" of simplification, as described in the Basis for Conclusions (BfC).

11) Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reporting

Rationale for the changes

The Amendments have clarified **the requirements in ESRS 1 Chapter 3 about** materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4).

Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale.

The Explanatory Memorandum **(EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "*[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process*."**

Description of the changes

To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA):

1. A **new part presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1)**
2. More prominence **has been given to materiality of information as a general filter and all the requirements are subject to it.**
3. The **relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22)**
4. It has been explicitly allowed to include **information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information**
5. Emphasis is **put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2)**
6. To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (**IRO) level, depending on the nature of the IROs and on how they are managed**
7. The list of **topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status.**

8. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. **Explanations have been provided with respect to the consideration of sites for the DMA and reported information, to avoid long lists of sites being included in the sustainability statement.**

Please **do not comment here in "Gross versus Net" as it is covered by the next question.**

Question

If you intend to provide feedback also on Part 3 of this questionnaire **(at the level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here.**

Do you agree that **the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?**

( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We appreciate the clarifications on IROs and related topics (ESRS 1, paras. 2 and 22), which enhance understanding. However, the simplified DMA approach, especially for complex value chains, may narrow the scope of disclosures. Additional guidance is required to ensure assessments remain robust.

We support more detailed reporting on companies' assessment processes. The determination of negative impacts guided by scale, scope, and irremediability, aligns well with the UNGPs and OECD Guidelines. Yet, annual reports often lack sufficient detail on how these indicators and impacts inform their DMA (methodologies) and materiality thresholds.

We welcome the flexibility to choose between top-down and bottom-up DMA approaches. Making Appendix A illustrative rather than prescriptive appropriately reduces rigidity. While the top-down method can be pragmatic, companies should clearly document their process and address potential blind spots. A quick scan of initially non-material topics may help mitigate these blind spots.

Reporting at the IRO level may reduce comparability across companies. Clear guidance and examples illustrating differences between topical and IRO-level disclosures would support preparers in making informed choices.

We also encourage undertakings to disclose what triggered changes in materiality assessments over time.

Value Chain Integration

We recommend stronger alignment between due diligence and value chain reporting. When negative material impacts are identified through due diligence, stakeholder engagement could be required.

Companies should explain (i) chosen value chain boundaries, (ii) coverage per material topic, and (iii) data quality for key metrics. Where policies or targets do not cover the value chain for material IROs, constraints and intended leverage mechanisms should be clarified, including time-bound plans for extension.

12) New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impacts

Rationale for the changes

To address a frequent implementation question **and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the Double Materiality Assessment (DMA) (the so called "gross versus net" issue). The EFRAG Sustainability Reporting Board (SRB) has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.**

Description of the changes

Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.

Key discussion points at EFRAG SRB level

Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector**, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.**

Question

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by **answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here.**

Do you agree that the **new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?**

( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We observe a difference in reporting approaches (net/gross) among data providers. For example, some data providers actually engage in dialogue with companies, while others do not. The "actual impact situation" therefore remains somewhat ambiguous and subjective. If companies were to report more on the "outcomes of any mitigation or prevention measures implemented before the impact occurred," this could potentially achieve greater uniformity in the assessment of adverse impacts.

The annual accounts primarily reflect a net approach, and the auditor's report on the sustainability report implicitly reflects a net approach.

A gross approach results in a more comprehensive sustainability report based on CSRD than a net approach. This expansion is not in line with the intended simplification.

Call for interest in participating to the field test

To address this complexity of this issue, EFRAG will run a targeted field test and is interested in involving a diversified sample of companies. It will entails participating in dedicated working sessions with EFRAG Secretariat. The company is expected to present how the new guidance will affect the outcome and process of the DMA in each case, after having simulated the application of the revised requirements. A questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8th and 26th September 2025.

To confirm your interest in participating to the field test on 'Gross versus Net' field test, please send an email to this address: grossnetfieldtest@efrag.org by August 18, 2025.

13) Improved readability, conciseness and connectivity of ESRS Sustainability Statements

Rationale for the changes

Starting **with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) Chapter 4).**

Description of the changes

EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information, **discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).**

Question

Do you agree that **these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?**

(x) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We support reducing duplication, particularly through clearer guidance on connected information.

We support the proposed amendments. When conducting sustainability disclosure analysis, we find that repeating content across sections of the annual report (most notably regarding policies, actions, and targets) only enhances complexity at the expense of transparency.

We also welcome the use of appendices for detailed metrics. This structure enhances readability and provides a clearer overview for users, while maintaining access to relevant data.

14) Restructuring of the architecture and interaction between ESRS 2 and Topical Standards

Rationale for the changes

The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical Standards. They have also introduced a more principles-based and less prescriptive approach to the requirements in policies, actions and targets (PAT). These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4).

The Explanatory Memorandum (EM) (**page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards.**

Description of the changes

To achieve this objective, EFRAG has implemented the **following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information:**

1. Minimum Disclosure Requirements in ESRS 2 (renamed "**General Disclosure Requirements") have been simplified but retained as 'shall' disclose.**
2. A d**rastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application.**
3. T**opical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical Standards (e.g. resilience in ESRS E1).**
4. The requirement to disclose PAT for material IROs**, if adopted ,is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained.**
5. The amendments have improved the connectivity between **the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed.**

Question

Do you agree that **these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?** ( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We do not support the removal of the requirement to disclose whether a Policy, Action, or Target (PAT) or timelines have been removed for material topics. Transparency is essential, particularly for material negative impacts and risks. Therefore, choosing to remove PATs should require an explanation.

Without an explanation, companies may simply state "no PAT" without clarifying existing gaps or intended actions, weakening accountability and comparability for investors.

We also have concerns about the reformulation of certain mandatory datapoints into Application Requirements (ARs). The legal status of ARs may be unclear to preparers, potentially leading to inconsistent interpretation and reduced enforceability. Clear communication that ARs represent mandatory methodological guidance is essential to maintain consistency and reliability in reporting.

Finally, we support the restructuring of the reporting architecture, which promotes conciseness and reduces duplication. It is important that companies focus on reporting what is most material to their operations, while maintaining clarity and completeness for users of sustainability information.

15) **Improved understandability, clarity and accessibility of the Standards**

Rationale for the changes
The Amendments have **reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which had a status problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4).** The Explanatory Memorandum (**EM) (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards.**

Description of the changes
To achieve this objective, EFRAG has implemented the **following changes:**

1. "May disclose" datapoints have been all eliminated**.**
2. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are **relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines.**
3. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS.

Question
Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG').

If you intend also to provide feedback on **Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level.**

Do you agree **that these proposed amendments achieve the desired level of clarity and accessibility?**
(x) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We welcome the proposed amendments, which significantly enhance clarity and accessibility. The removal of "may disclose", relocation of mandatory application guidance under each Disclosure Requirement (DR), and reformulations align well with Lever 4's objective of improving understandability, clarity and accessibility.

The restructuring of ESRS 1, clearly separating Disclosure Requirements (DRs) and Application Requirements (ARs), is a positive step towards useability. Furthermore, removing sub-subtopics and being more consistent with the use of *topics* and *sub-topics* improves navigation and interpretation. The clearer articulation of double materiality, especially the distinction between impact and financial materiality, supports more consistent application across sectors.

To build on these improvements, we recommend to:
1. Begin the ESRS 1 with a clear statement that ARs linked to DRs are mandatory and specify whether they are subject to assurance.

2. Introduce stable identifiers for each mandatory datapoint and AR (e.g., E1-6.M1 for a datapoint, E1-6.AR1 for its application requirement). This would improve navigation, reduce tagging errors, and support high-quality digital reporting and tool integration.

These enhancements would make the distinction between mandatory and non-mandatory content immediately clear, consistently applied, and easier to implement across systems. We therefore support the amendments, subject to these refinements, which are fully aligned with the intent of Lever 4.

16) Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG)

As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" **('NMIG').** NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that:

a) was in the Delegated Act
b) is now deleted; and
c) contributes to the overall datapoints reduction.

It **contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act.**

You are invited to provide your comments on the purpose of NMIG, if any.

You can access the NMIG at this **link.**

Select the NMIG from this dropdown menu of NMIG **guidelines:**

Insert dropdown list of 12 NMIG's and an option to pick **'All'** [COMMENTS – max 300 words]

We acknowledge that the Non-Mandatory Illustrative Guidance (NMIG) can offer valuable support to companies by clarifying reporting expectations and providing practical examples. This can enhance consistency and improve the decision-usefulness of sustainability information for investors.

However, the current legal status of NMIG remains unclear, which may lead to interpretive uncertainty. We support EFRAG's recommendation that NMIG content should not be included in the Delegated Act. Incorporating illustrative material into legally binding regulation could blur the distinction between mandatory and non-mandatory content, potentially increasing compliance burdens and undermining the simplification objectives.

Should the European Commission decide to include NMIG content in the Delegated Act, we recommend it be presented as a separate annex. The annex introduction should clearly state that the content is for guidance purposes only and does not carry compliance obligations. It should also explicitly confirm that undertakings are not required to justify deviations from these illustrative elements, thereby maintaining a clear distinction from mandatory disclosure requirements.

17) Burden reliefs and other suggested clarifications

Rationale for the changes

The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4).

The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless **included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation.**

Description of the changes

EFRAG **has implemented the following changes:**

1. The relief "**undue cost or effort" has been introduced, including for the calculation of metrics.**
2. A relief for **lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods.**
3. The systematic preference for direct **data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91).**
4. Undertakings may exclude from the calculation of metrics their **activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60).**
5. Disclosure about resilience is now limited to **risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21).**
6. When disclosing financial effects, the information on investments and plans **is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)).**

7. A n**ew relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1, Chapter 5.4) allowing the undertaking to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period.**
8. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions.

Following the EC representatives**' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.**

Following the EC representatives' **recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.**

Question

EFRAG considered how to improve **consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard.**

Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them.

Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?

( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We support the introduction of horizontal undue cost or effort relief. However, safeguards are essential to prevent overuse (particularly in value-chain metrics) which could undermine data consistency and comparability. Companies invoking this relief should disclose the rationale, scope excluded, and any material gaps to preserve decision-usefulness for investors.

On the use of estimates, we acknowledge the benefit of flexibility for preparers. At the same time, investors require estimates that are assurable, transparent, and comparable. We recommend clear criteria for estimation methodologies, including disclosure of bandwith of uncertainty, data coverage ratios, and plans to improve data quality over time. This will help maintain the integrity of reported information.

Regarding financial effects, we support Option 1, which aligns with IFRS relief and is familiar to large undertakings that fall within the scope of the CSRD. Quantitative disclosures are critical for valuation, performance analysis, and stewardship.

ESRS E1 must cover impact & risk (target alignment and transition investments).

Competitive advantages are derived from linking sustainability impacts to financial statements, not merely harmonizing language.

Relief for lack of data quality on metrics (ESRS 1 paragraph 92)

Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here.

Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?
( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We support allowing investee companies to balance thorough reporting with avoiding undue cost or effort. This flexibility may be most relevant during early implementation phases. However, we stress the importance of continuous improvement of reporting efforts by companies over time.

To maintain reliability and comparability, especially across peers and reporting periods, any room for using reliefs should be accompanied by clear safeguards. These include: a transparent rationale for invoking the relief, criteria used in the decision, disclosure of excluded scope, and time-bound plans to improve data coverage and quality.

As noted in the Basis for Conclusions, aligning these reliefs with IFRS S1 enhances interoperability.

19) Relief for anticipated financial effects

Rationale for the changes
Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging**. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 4 Lever 5). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.**

Description of the changes
The **Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11):**

a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated longterm financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS.

b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2.

Some of the **EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.**

Question
If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here.

Please select **from the alternatives below the one that represents your view:**
(x) I agree with Option1

( ) I agree with Option 2

( ) I disagree with both Options

[IN ALL CASES, PROVIDE THE RATIONALE FOR YOUR PREFERENCE AND SUGGESTIONS FOR IMPROVEMENTS IF ANY]

[COMMENTS – max 300 words]

- We prefer option 1, but stress the importance of the applicable conditions and safeguards (on the use of the relief) to be further specified. We believe that the availability of climate risk metrics is important. For that reason, the effects of both options should be assessed as prepares often raise undue costs and burden as a reason for not providing this information. It would be valuable to assess the conditions under which it can be invoked by a preparer and whether it could negatively impact on the wide availability of climate risk metrics.
- In terms of conditions and safeguard, one can consider for example:
* Phase-in requirement of the original ESRS, meaning that companies could comply with qualitative information in the first three years of reporting, and afterwards would need to report quantitative information.
*Transparency is essential: Companies should provide a clear rationale for invoking any relief, specify the methodology and uncertainty assumptions applied, and outline concrete improvement plans — comparable to the 'best-effort' obligation under SFDR.

20) ESRS E1: Disclosures on Anticipated Financial Effects

The content of the disclosure requirements on anticipated financial effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3 to avoid duplication of input. Your comments on those provisions can only be provided here.

Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 **strike an acceptable balance between (i) simplification and reporting effort and (ii) users' needs?** ( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

IF YOU REPLIED NO, SELECT THE PARAGRAPH ON WHICH YOU WANT TO EXPRESS AGREEMENT / DISAGREEMENT [SCROLLING MENU]:

( ) ESRS E1 - 40. (a)

( ) ESRS E1 - 40. (b)

( ) ESRS E1 - 40. (c)

( ) ESRS E1 - 40. (d) (

) ESRS E1 - 41. (a)

( ) ESRS E1 - 41. (b)

( ) ESRS E1 - 41. (c)

( ) ESRS E1 - 41. (d)

( ) ESRS E1 - 41. (e)

( ) ESRS E1 - 41. (f) (

) ESRS E1 - 42.

[COMMENTS – max 300 words] – AVAILABLE IN ALL CASES

We welcome the amendments aligning disclosure criteria with data requested by banks. As noted in the log of amendments, this alignment with IFRS S2 supports interoperability and consistency.

We recognise the practical challenges companies may face due to evolving methodologies and limited data availability. To ensure disclosures remain both feasible and decision-useful, we strongly support the consistent application of the *comply or explain* principle.

Under this approach, companies should disclose the required quantitative information by default. Where this is not possible, a clear and substantive explanation should be provided. Such disclosures offer valuable insights into a company's data infrastructure and risk management practices.

Applying *comply or explain* provides short-term flexibility while promoting transparency and long-term improvement. It supports the ambition of full quantitative reporting as methodologies mature, ensuring the framework remains practical for preparers and useful for investors.

21) Enhanced interoperability with the ISSB's Standards IFRS S1 and S2

Rationale for the changes

EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's Standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Chapter 4, Lever 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability.

One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting Standards. EFRAG prioritised the interoperability with IFRS **S1 and S2, following the majority input gathered in the public call for input and outreach.**

Description of the changes

To achieve this objective, EFRAG **implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments.**

1. In line with **IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information.**
2. To remove one of the main interoperability differences, t**he ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR 19), aligned with the financial control approach in the GHG Protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20).**
3. The **IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20).**
4. The implementation of reliefs that go beyond the ones in IFRS **S1 and S2 results in new interoperability differences (see question 16).**
5. Language **for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1.**
6. The r**eference to IFRS industry-based guidance and SASB Standards as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards).**
7. The datapoint reduction resulted in the e**limination of 7 "shall" datapoints described in Basis for Conclusions (BfC) (Chapter4, Lever 6).**
8. Several changes have been introduced to further advance **interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4, Lever 6).**

Question

Do you agree that the**se proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?** (x) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We welcome the increased interoperability between ESRS and IFRS S1/S2 (both in wording and the reliefs)
We support maximum interoperability, provided it does not compromise the ESRS's double materiality principle. Most asset owners (pension funds) require both the financial dimension offered by IFRS S1/S2 and the broader impact dimension of ESRS.

Key considerations:
ESRS E1 must remain broader than IFRS S2, covering both impact and risk dimensions, including target alignment, transition CAPEX, and forward-looking metrics.
The true value for investors lies in linking sustainability impacts to financial statements, not merely harmonizing terminology.

22) Reduction in the number of mandatory and voluntary datapoints
The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3.

The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking."

To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction.

Do you agree that the proposed **reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?**

( ) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

( ) I BELIEVE SOME OF THE DELETED CONTENT SHOULD BE MAINTAINED (PLEASE SPECIFY IN THE COMMENTS BY INDICATING THE RELEVANT PARAGRAPH IN THE STANDARD)

[COMMENTS – max 300 words]

23) Six datapoints exceptionally moved from "may" to "shall"

In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones

(subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC), Appendix 3).

Datapoint	**Rationale for moving from “may” to “shall”**
ESRS E3 Water - Own operations total withdrawal (Amended ESRS E3 paragraph 28 (c))	This requirement should not create an additional burden, as reporting water consumption already relies on understanding the water balance, including both withdrawals and discharges. Given this, the change from optional ('may') to mandatory ('shall') reflects the importance of these metrics in completing the water balance equation and ensuring fair presentation of material IROs. Water withdrawal—defined as the volume of water removed from ecosystems—is a key indicator for assessing pressure on local water resources, particularly in water-stressed regions.
ESRS E3 Water – Own operations total discharges	This requirement should not impose an additional burden, as reporting water consumption already depends on understanding the water balance, including both withdrawals and discharges. Accordingly, the
(Amended ESRS E3 paragraph 17)	change from optional ('may') to mandatory ('shall') reflects the importance of these metrics in completing the water balance equation and supporting the fair presentation of material IROs. Water discharges, in particular, serve as a complementary indicator to water withdrawals, providing a fuller picture of pressure on water resources.
ESRS E4 Biodiversity and ecosystems- Disclosure of transition plan for biodiversity and ecosystems	Changed to mandatory as this disclosure is considered highly decision-useful for users in relation to undertakings operating in certain sectors. Disclosing information on a transition plan (TP) is conditional to have one that is publicly released. This does not add burden as the plan is already public and the information normally available. Implementing TPs, and disclosing on them, is an area that is normalizing and expected to become increasingly important in future years.
ESRS G1 Business conduct– Training of procurement team (Amended ESRS G1 paragraph 10 (c))	The revision G1 has consolidated previous scattered datapoints on training in one generic provision, while specifying the target audience considered critical in sustainability (such as the procurement team). This DP is an important information related to management of suppliers’ relationship for which several other DPs have been deleted.
ESRS G1 Business conduct confirmed incidents (Amended ESRS G1 paragraph 14) (1) Nature of incidents (2) Number of incidents	ESRS G1 did not include any mandatory metric on incidents of corruption and bribery, except for the SFDR indicators This provision replaces narrative information about corruption and bribery with a quantitative metric. The definition of confirmed incidents is well provided in the Glossary. The required disclosure does not include names or persons involved nor other recognisable characteristics, so that it does not interfere with any legal process.

Do you agree that these exception**s to the general rule are appropriate and justified?**
( ) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

_____ _____

_____

_____

24) Four new mandatory datapoints (exception)

In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified.

It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. **In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6).**

Datapoint	Rationale for new datapoints
ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement	This may be considered as a new datapoint but replaces several datapoints compared to the Delegated Act. The undertaking now must only state when certain principles were applied and when there is a divergent application from the general requirements, this means that it is not disclosed according to ESRS 1; examples are time horizons or changes in preparation or presentation of sustainability information.
E2-4 Secondary microplastics resulting from the breakdown of larger plastic items or being unintentionally produced through the life cycle of the product.	The amount of secondary microplastics was already required to be reported in ESRS E2 through AR 20, which addressed both primary and secondary microplastics. However, the Q&A process and the outreach analysis highlighted a lack of clarity on the disclosure requirements in relation to primary and secondary microplastics. The
Clarification of former ESRS E2 paragraphs 28(b) and AR 20 leading to new added DP .	addition of a new qualitative datapoint on secondary microplastics, separate from the Set 1 microplastics datapoint, was favoured to improve clarity and simplify the understanding of the microplastics requirements. Secondary microplastics represent the main source of microplastics released into the environment.
E5-4 Percentage of total weight that are critical and strategic raw material Added draft ESRS E5 paragraph 15(c).	Added for better alignment with recent EU regulatory developments, particularly the Eco-design for Sustainable Product Regulation and Critical Raw Materials Act.
E5-5 Percentage and/or total weight for which the final destination is unknown. Added in draft ESRS E5 paragraph 18(e).	Added to allow mass balance of final destination of waste to be completely disclosed, not forcing undertakings to make unreasonable estimations but instead allowing them to disclose on the figures they have and can reasonably document.

Do you agree that these exception**s to the general rule are appropriate and justified?**
(x) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We consider the proposed datapoints highly relevant for investors, as they clarify key elements essential to assessing a company's sustainability performance and risk exposure. Their inclusion can enhance transparency, comparability, and the overall decision-usefulness of reported information.

25) Emphasis on ESRS being a "fair presentation" reporting framework

The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practices. They think that the Amendments may result in increased legal risks and audit costs.

Do you agree that **explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?** ( ) YES

(x) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

- We welcome the emphasis on ESRS as a fair-presentation framework, aligned with IFRS S1, and with materiality as a general filter. This could help reduce 'checklist-reporting' and imrove decision-useful information for investors.

- There is the concern that 'fair presentation' could be interpreted by auditors as 'true and fair view' of the annual accounts, but this is only applicable with reasonable assurance, not with limited assurance (as prescribed by the CSRD). This mean that, in line with paragraph 51 of the BfC, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers executes only a review of the process.

- Since EFRAG indicates that it is not their role to specify the auditor's role and mandate, we ask EFRAG to address this issue with the European legislator.

- However, some question whether fair presentation should solely on management judgement. To safeguard comparability and reliability, members support some sort of safeguards. For example, for the accountant to monitor the fair presentation.

26) Exception for Financial Institutions' Absolute Climate Reduction Targets

One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual decommissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.

( ) I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets (LINK TO TEXT BOX)

( ) I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets

Explain your reasoning and if you agree, elaborate on how financial institutions will give transparency and foresight to investors about their target setting and the evolution of their emissions [max 300 words].

_____

_____

_____

_____

27) **ESRS S1: New Threshold for Reporting Metrics Disaggregated at Country Level**

Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8). Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited.

If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here.

Do you agree with the change to the **threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?** ( ) YES
( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

_____ _____

_____

_____

28) **ESRS S1: Calculation approach to adequate wages outside the European Union (EU)**

The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability.

In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 b) i) to iii) to ensure transparency and comparability on this issue.

A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in

participating in the field test on adequate wages, please send an email to fieldtestadeqwages@efrag.org by August 18, 2025.

Do you agree with the proposed change to the **methodology for the calculation of non-EU adequate wages in ESRS S1?** ( ) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

(x) NO

[COMMENTS – max 300 words]

We welcome the inclusion of key elements such as collective bargaining and periodic revision of minimum wages, which are relevant for assessing wage adequacy. However, we share concerns raised by EFRAG SRB members regarding clarity and comparability.

To support investor analysis, it is essential that companies disclose which prong of the wage adequacy methodology is used. Without this, it is difficult to assess the robustness of reported figures or compare across peers and through time. We recommend referencing the ILO's internationally recognised definition of a living wage to strengthen consistency.

As currently phrased, adequacy may be interpreted as meeting national minimum wage levels, which in many non-EU countries fall short of covering basic needs. We are convinced that the current phrasing risks misrepresenting wage conditions and undermines comparability.

The current hierarchy of wage indicators could also lead to misleading conclusions. A company reporting 100% of employees earning at least the minimum wage may appear to outperform a company that reports 80% earning a living wage, despite the latter reflecting a higher standard.

We suggest reversing the order: prioritise living wage estimates, and only refer to minimum wage data where living wage benchmarks are unavailable.

Finally, we welcome EFRAG's field testing initiative, which will help refine the methodology and improve practical implementation.

29) SFDR and other EU datapoints in Appendix B of Amended ESRS 2

The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction.
Appendix 4 in the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now 1

The key changes for Social Standards (ESRS S1-S4) are:

a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social Standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to

severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social Standards.

b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified.

There were no changes in the ESRS G1.

In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased.

Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any. (x) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

( ) NO

[COMMENTS – max 300 words]

We support the consolidation of datapoints and removal of overlaps, as this can improve readability and reduce duplication for preparers.

However, it is essential that investor use-cases under SFDR remain fully supported. For asset owners and -managers relying on ESRS data to meet SFDR Annex I PAI reporting, changes must ensure complete and computable coverage of all relevant indicators (even after deletion and mergers).

All SFDR Table 1 datapoints should remain mandatory within ESRS topics. These indicators are critical to the functioning of the Sustainable Finance Disclosure Regulation and must remain accessible to financial institutions.

We specifically object to the proposed removal of Indicator 3, table 1 (Gross GHG emissions intensity). The rationale that users can calculate this themselves overlooks practical challenges:

It creates inefficiencies and increases the burden on financial institutions.

It risks inconsistent methodologies across undertakings and may promote cherry picking.

It undermines the SFDR's goal of providing standardised, comparable data.

We would also prefer the obligation to report total emissions distinctly (even though it can be derived from combining Scope 1, 2, and 3 figures). Yet, the intensity ratio is a distinct and decision-useful metric that is of far greater importance to us. Its removal could lead to misleading comparisons and reduced data quality.

30) ESRS E4 DR E4-4

ESRS E4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS Set 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN.

Do you agree that EFRAG should review AR 26 in Amended ESRS E4? Please provide suggested wording.

(x) YES
( ) PARTIALLY AGREE/PARTIALLY DISAGREE
( ) NO

You are invited to provide suggestions for improvements, if any. [TEXT BOX – 300 words]

The ESRS GDR-T still require companies to publish information on the methodology, baseline value, scope of target etc.

31) ESRS S1 DR15: Gender pay gap

Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint.

The voluntary datapoint on adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in ESRS Set 1. The deletion of the voluntary datapoint aligns with the general approach in the revised architecture.

Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?

( ) YES
(x) PARTIALLY AGREE/PARTIALLY DISAGREE
( ) NO

We believe the adjusted gender pay gap is a more meaningful indicator for investors than the unadjusted metric, as it better reflects wage equity and supports robust peer and trend comparisons.
While we understand the unadjusted metric was introduced to align with SFDR requirements, it is worth noting that the ESAs have previously acknowledged its limitations and proposed replacing it with the adjusted metric in the revised RTS. This was not pursued due to alignment constraints with the ESRS at the time.
We see this as an opportune moment to signal that both ESRS and SFDR should adopt the adjusted gender pay gap as the primary datapoint. This would improve decision-usefulness and better reflect investor needs.
The additional reporting burden for companies is expected to be limited, as the adjusted metric is already widely used in response to investor demand.

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

The revision of ESRS G1 have led - amongst others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs.

Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SMEs?

( ) YES

( ) PARTIALLY AGREE/PARTIALLY DISAGREE

(x) NO

[COMMENTS – max 300 words]

_____

We recommend greater transparency for the procurement practices of large undertakings, as these can significantly influence value chain impacts.

For example, strict contractual terms (such as tight delivery deadlines) may unintentionally contribute to adverse labour conditions, including excessive overtime.

Improved transparency in how suppliers are managed would help investors better assess social risks and the effectiveness of a company's due diligence processes.

33) Overall feedback per standard

The **12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal.**
Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation:

1. Definition of value chain for financial institutions **(ESRS 1);**
2. Exemption from consolidating subsidiaries by undertakings that are financial holdings **(ESRS 1);**
3. Relief for omission of confidential/sensitive information **(ESRS 1);**
4. Phasing-in provisions **(ESRS 1);**
5. Clarify the meaning of 'compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1).

In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards.

If you intend to comment also at level of single DR **in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3).**
You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this li

In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.

***Do you agree that the proposed Amended ESRS* strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?**

	I agree	I PARTIALLY AGREE/PARTIALLY DISAGREE agree	I disagree

ESRS 1	( )	( )	( )
ESRS 2	( )	( )	( )
ESRS E1	( )	( )	( )
ESRS E2	( )	( )	( )
ESRS E3	( )	( )	( )
ESRS E4	( )	( )	( )
ESRS E5	( )	( )	( )
ESRS S1	( )	( )	( )
ESRS S2	( )	( )	( )
ESRS S3	( )	( )	( )
ESRS S4	( )	( )	( )
ESRS G1	( )	( )	( )
Glossary	( )	( )	( )

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

We recognize that the ESRS are overly burdensome, and a significant number of data points is irrelevant for investors and stakeholders. At the same time, it needs to be avoided that important data points for pension investors will be removed that are relevant for the responsible investment policies of pension funds or their own reporting requirements under the SFDR . The following points are most relevant for Dutch pension fund investors:

ESRS 2

- *Governance (2) GOV-1; GOV-2; GOV-3; GOV-4; GOV-5*
- *Strategy (3) SBM-3*
- *Metrics and Targets (5) MDR-M; MDR-T*

ESRS E

- *Climate and Energy (E1) E1-1; E1-3; E1-4; E1-5; E1-6; E1-7; E1-8; E-9*
- *Pollution (E2) E2-4; E2-5; E2-6*
- *Water and Marine Resources (E3) E3-1; E3-4; E3-5*
- *Biodiversity and Ecosystems (E4) E4:1; E4-2; E4-4; E4-5; E4-6*
- *Resource Use and Circular Economy E5-4; E5-5*

ESRS S

- *Own Workforce (S1) S1-1; S1-2; S1-6; S1-7; S1-8; S1-9; S1-13; S1-14; S1-16; S1-17*
- *Workers in the Value Chain (S2) S2-1*
- *Affected Communities (S3) S3-1*
- *Consumers and End-Users (S4) S4-1*

The majority of these data points have been maintained in the exposure draft. We support this decision.

34) Any other comments

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

_____

- The questionnaire states that some requirements were not changed in the amended ESRS as they are subject to level 1 changes. This a.o. relates to the meaning of 'compatibility with 1.5 degrees" for the Transition Plans disclosures. In that respect we do note that clarification is needed, for example re. the base year (reference point) for measuring the reduction of greenhouse gas emissions and setting climate targets. (Explanation: Companies that started early with Climate Transition Plans (KTP), for example, may use 2019 as their base year. However, as CO_2 data and other information improve over time, it may be useful to use a more recent year as the base year. This raises practical considerations, such as how to handle reporting—especially in terms of comparability with previous annual figures. Guidance on this could be helpful, particularly regarding comparability between companies. It could also support establishing an accepted way of working for the external auditor.)

- By way of guidance, we propose EFRAG to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes. (Explanation: For financial accountability reports like annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.)

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

In this part (optional) you can select to provide your opinion on the level of simplification achieved for one or more DR (or chapter in case of ESRS 1) and to provide your comments on the corresponding paragraphs of the 12 Amended ESRS Standards.

You can access the Exposure Drafts of the **Amended ESRS at this link:** **Amended ESRS Exposure Draft July 2025 ESRS E1**

In case you would like to see the rationale behind the amendments, you can access the Log of Amendments at this link: **Log of Amendments of the ESRS Exposure Draft July 2025 ESRS E1**

Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?

When responding on Part 3 you will have the possibility to provide comments at paragraph level, in addition to commenting at DR (Chapter of ESRS 1) level. If you intend to provide comments at paragraph level, you are invited to do so by using the provided Excel Template (XLSX file). Please upload the filled in Excel Template in the designated box at the end of the survey. Be aware that comments provided in a different format than the provided template will create technical issues and EFRAG may not be able to process them.

[PLEASE NOTE THAT THERE WILL BE A**N INTERACTIVE MENU, SO IN THE DIGITAL VERSION OF THE SURVEY THE RESPONDENT WILL SELECT THE TOPIC AND THEN CHOOSE IF THEY WOULD LIKE TO PROVIDE COMMENTS ON THE CORRESPONDING DR.]**

	I agree	I PARTIALLY AGREE/PARTIALLY DISAGREE agree	I disagree	I would like to provide detailed comments on the DR	I would like to provide detailed comments on the paragraphs (via the Excel Template)
Disclosure Requirement E1-1 - Transition plan for climate change mitigation	( )	( )	( )	( )	( )
Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	( )	( )	( )	( )	( )
Disclosure Requirement E1-3 - Resilience in relation to climate change	( )	( )	( )	( )	( )

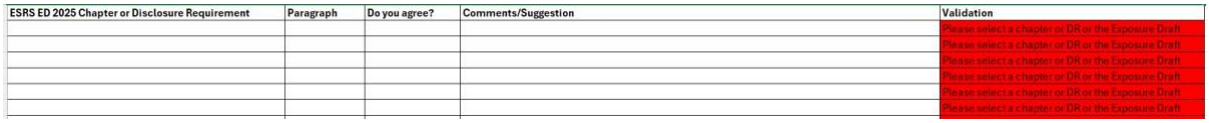
Disclosure Requirement E1-4 - Policies related to climate change	( )	( )	( )	( )	( )
Disclosure Requirement E1-5 - Actions and resources in relation to climate change	( )	( )	( )	( )	( )
Disclosure Requirement E1-6 - Targets related to climate change	( )	( )	( )	( )	( )
Disclosure Requirement E1-7 - Energy consumption and mix	( )	( )	( )	( )	( )
Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	( )	( )	( )	( )	( )
Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	( )	( )	( )	( )	( )
Disclosure Requirement E110 - Internal carbon pricing	( )	( )	( )	( )	( )

Disclosure Requirement E111 - Anticipated financial effects from material physical and transition risks and potential climaterelated opportunities	( )	( )	( )	( )	( )

Providing detailed comments on paragraph level using the Excel Template Excel Template upload

If the respondent wishes to provide comments and suggestions at paragraph level it can do so via an Excel Template, EFRAG recommends to do so by downloading the Template from **here**. The filled in Excel Workbook can then be uploaded as part of this survey. Please note that submissions of any other file that is not based on the Excel Template will not be processed and considered.

Preview of the downloadable Excel Template:



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

Please upload the Excel Template with detailed comments on paragraphs using the Browse button.

End of the survey

This page concludes and submits the survey. Kindly ensure that all questions you intended to answer have been completed before clicking the submit button.

Thank You!

Thank you for taking our survey. Your contribution is very important to us.

You will receive an email with your submission in a few minutes. **Please, check also your spam folder.**