The Omnibus Package Clarifications and next steps for sustainability reporting

ECR Hellas 16th Conference

4 June 2025

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Shape the future with confidence

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The better the question. The better the answer. The better the world works.

Section 1

The CSRD before Omnibus

The Corporate Sustainability Reporting Directive (CSRD) before Omnibus

WHY & WHO

- On 16 December 2022, the Corporate Sustainability Reporting Directive (CSRD), which amends the existing Non-Financial Reporting Directive (NFRD), was published in EC official journal.
- Aims to align sustainability reporting with financial reporting.
- Consistent sustainability reporting by companies, so that various stakeholders can use comparable and reliable sustainability information.

~50,000

Companies will perform detailed sustainable reporting compared with the current 11,600 companies within the scope of the NFRD.

NFRD

Large public interest entities with > 500 employees Public interest entities are:



Banks & Insurance companies



- > 250 employees and/or
- > 50m Turnover and/or
- > 25m Total assets

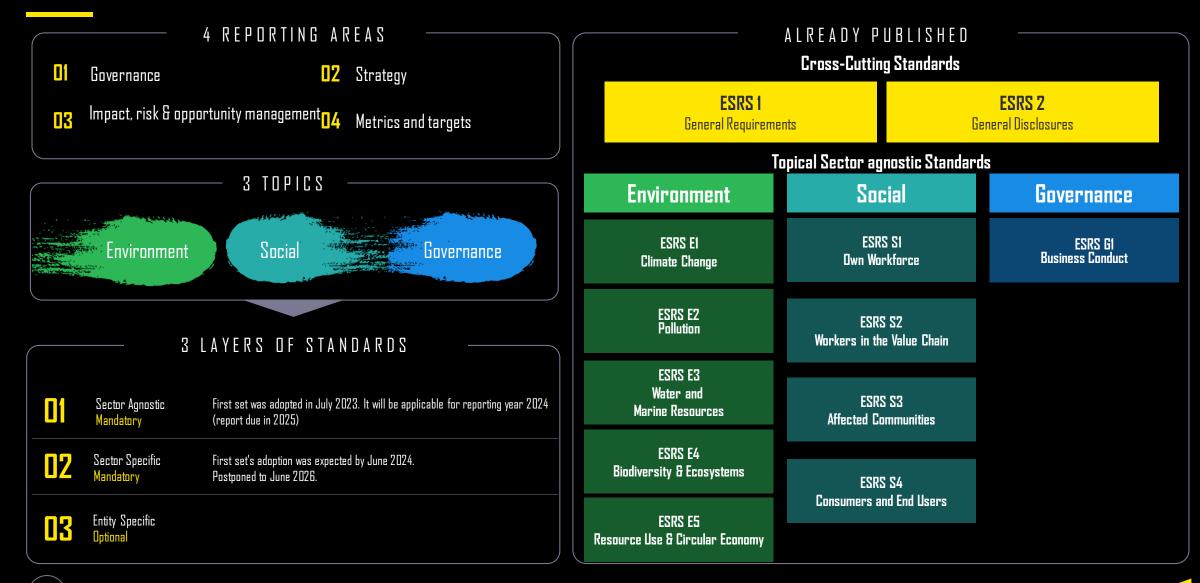
Listed companies

> 10 employees, includes SMEs

Non-EU companies with substantial activity in EU

> 150 m turnover, and at least one subsidiary or branch in the EU

The European Sustainability Reporting Standards before Omnibus





Section 2

The Omnibus package

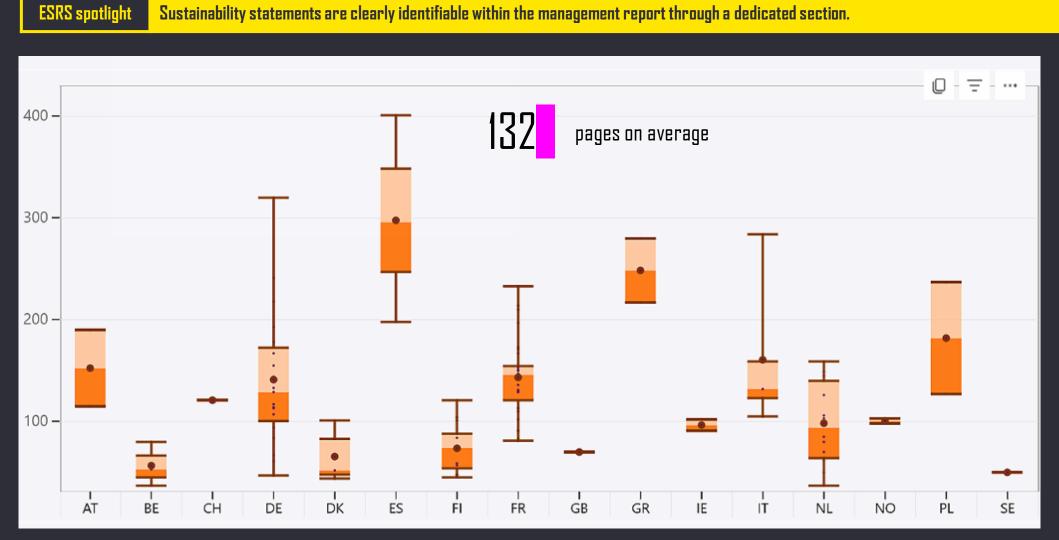
	Company classification	Original dates	"Stop-the-clock" Directive (final), to be transposed by Dec 2025	Substantive change directive (proposed revisions) and related delegated-acts
Wave 1	Large listed companies >1,000 employees	Report from 2025 (fiscal years starting on or after 1 January 2024)	No change Expected prolongation of ESRS phase-in provisions	Continue to report against "simplified" ESRS Taxonomy: "opt-in" if net turnover <eur450m, reporting<br="">simplifications</eur450m,>
	Large listed companies <1,000 employees			<mark>Out of scope</mark> Value chain responses under new VSME(*) standard

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				Value chain responses under new VSME(*) standard
Wave 2	Large companies >1,000 employees	Report from <mark>2026</mark> (fiscal years starting on or after I January 2025)	Postpone reporting until <mark>2028</mark> (fiscal years starting on or after 1 January 2027)	Report from 2028 against "simplified" ESRS
				Taxonomy: "opt-in" if net turnover <eur450m, reporting<br="">simplifications (materiality thresholds, templates, DNSH pollution)</eur450m,>
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	Large companies <1,000 employees			Out of scope
				Value chain responses under new VSME* standard
Wave 3	Listed SMEs (excluding micro-enterprises), small and non-complex credit institutions, captive insurance undertakings	Report from <mark>2027</mark> (fiscal years starting on or after 1 January 2026)	Postpone reporting until <mark>2029</mark> (fiscal years starting on or after 1 January 2028)	Out of scope

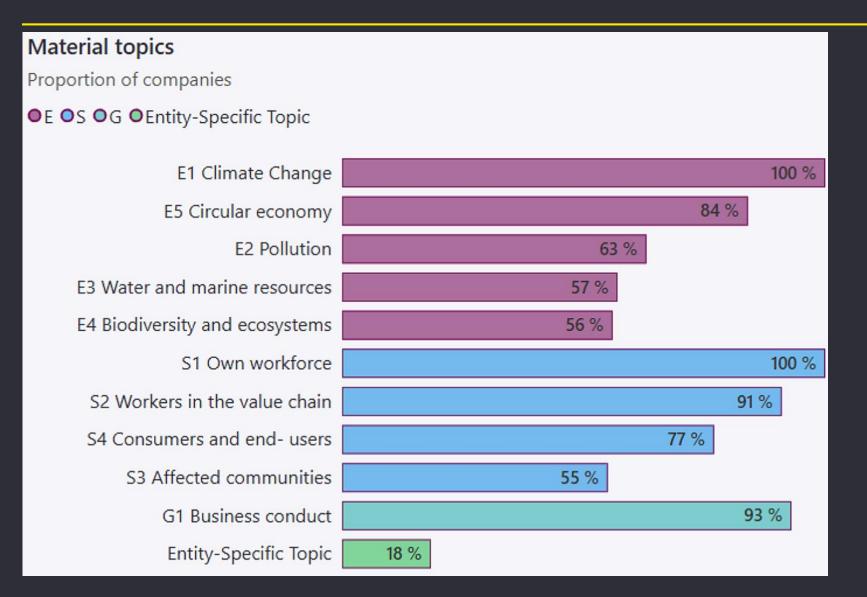
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	Large listed companies			Out of scope
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	Large companies <1,000 employees			Out of scope
				Value chain responses under new VSME* standard
Wave 3	Listed SMEs (excluding micro-enterprises), small and non-complex credit institutions, captive insurance undertakings	Report from 2027 (fiscal years starting on or after 1 January 2026)	Postpone reporting until <mark>2029</mark> (fiscal years starting on or after 1 January 2028)	Out of scope
Wave 4	Non-EU undertakings with significant EU activity	Report from <mark>2029</mark> (fiscal years starting on or after January 2028)	No change	No change for ultimate parents with at least one large subsidiary generating <mark>overall >EUR450m revenue</mark> or branch with <mark>revenue</mark> >EUR50m
				Ultimate parents below proposed "revised" thresholds are <mark>out of</mark> scope

Sustainability statements length is primarily dependent on the country of origin of the undertaking





Which material topics are the most reported?





So, what's next? Recommendations for sustainability reporting

Thank you for your attention