Die wichtigsten Rechtsvorschriften zur Berichterstattung nach VSME (read me)

ANLEITUNG – Wo finde ich die Vorschriften?

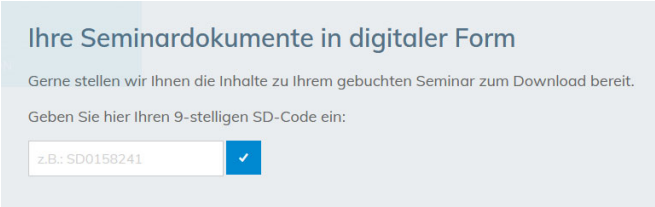
Variante 1: Download-Center von AUDfIT®

Mit der **Anmeldebestätigung per E-Mail** haben Sie einen **persönlichen SD-Code** bekommen

Beispiel: SD7378577

Bitte gehen Sie auf unsere **Homepage** und dort in den Bereich „Seminardokumente".
Sie können auf folgenden Link mit Strg + Mausklick gehen: https://audfit.de/digitales-skript/

Sie gelangen auf unsere Webseite, auf der Sie **Ihren persönlichen SD-Code (per E-Mail zugegangen) eingeben** können:



Im Seminardokumente-Bereich finden Sie alle in der Übersicht (RV 0)
„Die wichtigsten 14 Rechtsvorschriften für die nichtfinanzielle Berichterstattung"
unter der entsprechenden **Nummerierung:**

Beispiel:

RV	Richtlinien-Verordnungen der EU-Kommission
RV 1	„VSME" **Voluntary Sustainability Standard for non-listed SMEs vom Dezember 2024** (66 Seiten, pdf)

Nun können Sie sich die gewünschten Rechtsvorschriften ansehen und/oder herunterladen.

Variante 2: Aufruf über Ihren Internet-Browser per Hyperlink

In der Rechtsvorschrift 0 haben wir Ihnen einen Überblick (Zusammenfassung) der Richtlinien erstellt. In dieser finden Sie unterhalb der Beschreibung der einzelnen Rechtsvorschrift einen Hyperlink, in blauer Schrift, den Sie direkt anklicken können und so direkt zur Vorschrift können.
Voraussetzung: Sie brauchen eine **funktionierende Internetverbindung**

Beispiel: **„VSME"**
Voluntary Sustainability Standard for non-listed SMEs vom Dezember 2024 (66 Seiten, pdf))
https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/VSME%20Standard.pdf

Mit der Maus auf diesen Pfad gehen und mit STRG + Mausklick aktivieren

Variante 3: Aufruf über QR-Code

In der 3. Spalte der Rechtsvorschriften finden Sie jeweils einen entsprechenden **QR-Code.**
Sie brauchen dazu ein **zusätzliches Gerät (Handy, Tablet)** mit dem Sie den QR-Code abfotografieren und dann die angezeigte URL öffnen können.

Beispiel:

RV	Richtlinien-Verordnungen der EU
RV 1	„ VSME" **Voluntary Sustainability Standard for non-listed SMEs vom Dezember 2024** (66 Seiten, pdf)

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Überblick Rechtsvorschriften und Unterstützungsmaterialien VSME (RV-VSME)

RV	Richtlinien – Verordnungen der EU	Seite / QR-Code
1	**„VSME“** Voluntary Sustainability Standard for non-listed SMEs vom Dezember 2024 (66 Seiten, pdf) https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/VSME%20Standard.pdf	RV0005 – RV0072
2	**„VSME – Basis for Conclusions“** EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME), Basis for Conclusions, December 2024 (323 Seiten, pdf) https://api.knowledgehub.efrag.org/dev-doc-attachment/vsme-basis-for-conclusions.pdf	RV0073 – RV0396
3	**„VSME – Kosten-Nutzen-Analyse“** EFRAG Voluntary Sustainability Reporting Standard for non-listed SME´s (VMSE): EFRAG´s Cover Letter on the cost-benefit analysis for the Voluntary Sustainability Reporting Standard for non-listed SME´s (60 Seiten, pdf) https://api.knowledgehub.efrag.org/dev-doc-attachment/efrags-cover-letter-and-cost-benefit-analysis-on-vsme.pdf	RV0397 – RV0457
4	**„Empfehlung EU zur Anwendung VSME“** Empfehlung der Kommission vom 30.7.2025 für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen (C(2025) 4984 final (9 Seiten, pdf) https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme_de.pdf	RV0458 – RV0467
5	**„Anhang I der EU-Empfehlung – VSME“** Anhang I der Empfehlung der Kommission für einen Standard für die freiwillige Berichterstattung kleiner und mittlerer Unternehmen vom 30.07.2025 (33 Seiten, pdf) https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme-annex-1_de.pdf	RV0468 – RV0501
6	**„Anhang II der EU-Empfehlung – Praktische Leitlinien“** Anhang II der Empfehlung der Kommission für einen Standard für die freiwillige Berichterstattung kleiner und mittlerer Unternehmen vom 30.07.2025 (46 Seiten, pdf) https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme-annex-2_de.pdf	RV0502 – RV0548

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RV	Richtlinien – Verordnungen der EU	Seite / QR-Code
7	**„Digitales Template VSME“** Benutzerfreundliche Datenerfassung der Datenpunkte des VSME in einem digitalen Excel-Template (Version 1.1.1. vom 27.11.2025) (Excel-Tabelle mit interaktiven Kontrollkästchen) https://www.efrag.org/en/vsme-digital-template-and-xbrl-taxonomy	RV0549 – RV0550 NUR DIGITAL
8	**„VSME XBRL Taxonomiepaket“** Datenmodell zur VSME-Berichterstattung (u.a. XBRL-Format) zur Erleichterung des Datenaustauschs und Datenbankimporte mithilfe eines strukturierten, lizenzfreien und offenen Formates (VSME XBRL Taxonomiepaket vom 27.11.2025) https://www.efrag.org/en/vsme-digital-template-and-xbrl-taxonomy	RV0551 NUR DIGITAL
9	**„VSME-Unterstützungsleitfaden zu C2 – Maßnahmen, Strategien“** VSME Supporting Guide on Dislosure C2 – Comprehensive Module (Practices, Policies, and Future Initiatives) vom 11.12.2025 https://www.efrag.org/en/vsme-supporting-guide-on-disclosure-c2-comprehensive-module-practices-policies-and-future	RV0552 NUR DIGITAL
10	**„VSME-Unterstützungsleitfaden zu C3 – THG-Reduktionsziele und Klimawende“** VSME Supporting Guide on Dislosure C3 – Comprehensive Module (GHG reduction targets and climate transition) vom 11.12.2025 https://www.efrag.org/en/vsme-supporting-guide-on-disclosure-c3-comprehensive-module-ghg-reduction-targets-and-climate	RV0553 NUR DIGITAL
11	**„VSME-Unterstützungsleitfaden zu C7 – schwere negative Menschenrechtsvorfälle“** VSME Supporting Guide on Dislosure C7 – Comprehensive Module (Severe negative human rights incidents (paragrph 62 c)) vom 11.12.2025 https://www.efrag.org/en/vsme-supporting-guide-to-disclosure-c7-comprehensive-module-severe-negative-human-rights-incidents	RV0554 NUR DIGITAL
12	**„ESRS Knowledge Hub“ – Rubrik „2025 VSME & VSME Ökosystem“** Zentrale interaktive Plattform mit allen angenommenen Standards, praktischen Umsetzungsleitlinien im interaktiven Modus, neueste Entwürfe von Standards und Unterstützungsmaterialien. https://knowledgehub.efrag.org/eng	RV0555 NUR DIGITAL
13	**„VSME-Market Acceptance“** VSME Market Acceptance – Progress Report vom 16.12.2025 (36 Seiten, pdf) https://www.efrag.org/sites/default/files/media/document/2025-12/VSME%20Market%20Acceptance%20Survey%20Report.pdf	RV0556-592

14	**„NACE-Code-Verordnung“ (39 Seiten, PDF)** Verordnung (EG) 1893/2006 vom 20.12.2006 zur Aufstellung der statistischen Systematik der Wirtschaftszweige NACE Revision 2 und zur Änderung der Verordnung (EWG) Nr. 3037/90 des Rates sowie einiger Verordnungen der EG über bestimmte Bereiche der Statistik. https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32006R1893	**RV0593 – RV0641**

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EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

December 2024

Inoffizielle Übersetzung. Bereitgestellt durch www.vsme-guide.com

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„VSME“
Voluntary Sustainability Standard for non-listed SMEs vom Dezember 2024 (66 Seiten, pdf)

https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/VSME%20Standard.pdf

#RV0006

EFRAG
sustainability reporting

EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

Stand: 01.02.2024

December 2024

Inoffizielle Übersetzung. Bereitgestellt durch www.vsme-guide.com



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Zielsetzung dieses Standards und für welche Unternehmen er gilt

1. Das Ziel dieses freiwilligen Standards ist es, Kleinst-, Klein- und mittlere Unternehmen zu unterstützen:

   (a) Bereitstellung von Informationen, die dazu beitragen, den Datenbedarf großer Unternehmen zu decken, die von ihren Lieferanten Informationen zur Nachhaltigkeit verlangen;

   (b) Bereitstellung von Informationen, die dazu beitragen, den Datenbedarf von Banken und Investoren zu befriedigen und somit den Unternehmen den Zugang zu Finanzmitteln zu erleichtern;

   (c) Verbesserung des Managements von Nachhaltigkeitsproblemen, d. h. von ökologischen und sozialen Herausforderungen wie Umweltverschmutzung, Gesundheit und Sicherheit der Mitarbeiter. Dies wird ihr wettbewerbsfähiges Wachstum unterstützen und ihre Widerstandsfähigkeit kurz-, mittel- und langfristig erhöhen; und

   (d) einen Beitrag zu einer nachhaltigeren und integrativeren Wirtschaft zu leisten.

2. Dieser Standard ist freiwillig. Er gilt für Unternehmen[1] , deren Wertpapiere nicht zum Handel an einem geregelten Markt in der Europäischen Union zugelassen sind (nicht börsennotiert). [In Artikel 3 der Richtlinie 2013/34/EU werden drei Kategorien von kleinen und mittleren Unternehmen auf der Grundlage ihrer Bilanzsumme, Nettoumsatzes und ihrer durchschnittlichen ***Beschäftigtenzahl*** während des Geschäftsjahres definiert.

   (a) Ein Unternehmen gilt als Kleinstunternehmen, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. 450.000 € in der Bilanzsumme;

      ii. 900.000 € Nettoumsatz; und

      iii. durchschnittlich 10 Mitarbeiter.

   (b) Ein Unternehmen ist klein, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. 5 Millionen € in der Bilanzsumme;

      ii. 10 Millionen Euro Nettoumsatz; und

      iii. durchschnittlich 50 Mitarbeiter.

   (c) Ein Unternehmen ist mittelgroß, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. 25 Millionen € in der Bilanzsumme;

      ii. 50 Millionen Euro Nettoumsatz; und

      iii. durchschnittlich 250 Mitarbeiter.

3. Diese Unternehmen fallen nicht in den Anwendungsbereich der Richtlinie über die Sozialberichterstattung von Unternehmen (CSRD), werden aber ermutigt, diesen Standard zu verwenden. Dieser Standard deckt dieselben Nachhaltigkeitsthemen ab wie die Europäischen Standards für die Nachhaltigkeitsberichterstattung (ESRS) für Großunternehmen. Er ist jedoch verhältnismäßig und berücksichtigt daher die grundlegenden Merkmale von Kleinst-, Klein- und mittleren Unternehmen. Kleinstunternehmen sind eingeladen, nur bestimmte Teile dieses Standards zu verwenden, wie in Absatz 5(a) hervorgehoben.

4. Bei der Ausarbeitung dieses Standards wurde sorgfältig darauf geachtet, dass er mit den ESRS für Großunternehmen übereinstimmt, während gleichzeitig verhältnismäßige Anforderungen festgelegt wurden. Dieser Standard hat im Gegensatz zu den ESRS für Großunternehmen keine rechtliche Autorität.

[1] Dazu gehören Selbstständige, Unternehmen ohne eigene Rechtspersönlichkeit und börsennotierte Kleinstunternehmen.

Aufbau dieser Norm

5. Dieser Standard besteht aus zwei Modulen, die das Unternehmen für die Erstellung seines Nachhaltigkeitsberichts verwenden kann:

   (a) **Basismodul:** Angaben B1 und B2 und grundlegende Metriken (B3 bis B11). Dieses Modul ist der Zielansatz für Kleinstunternehmen und stellt eine Mindestanforderung für andere Unternehmen dar; und

   (b) **Umfassendes Modul:** Dieses Modul enthält zusätzliche Daten zu den Angaben B1-B11, die von Banken, Investoren und Firmenkunden des Unternehmens zusätzlich zum Basismodul verlangt werden können.

   In Paragraph 24 werden die verfügbaren Optionen für die Erstellung eines Nachhaltigkeitsberichts unter Anwendung dieses Standards durch die Annahme eines oder mehrerer dieser Module dargestellt. Sobald ein Modul ausgewählt wurde, ist es in seiner Gesamtheit zu erfüllen (mit der in Paragraph 22 eingeräumten Flexibilität); die einzelnen Angaben sind jedoch nur dann zu machen, wenn sie auf die spezifischen Umstände des Unternehmens anwendbar sind.

6. Die Anwendung des Basismoduls ist eine Voraussetzung für die Anwendung des umfassenden Moduls.

7. Anhang A *Definierte Begriffe* enthält die Definitionen der in dieser Norm verwendeten Begriffe. In der gesamten VSME-Norm sind die im Definitionsglossar (Anhang A) definierten Begriffe ***fett und kursiv*** gesetzt, es sei denn, ein definierter Begriff wird mehr als einmal im selben Absatz verwendet.

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Grundsätze für die Erstellung des Nachhaltigkeitsberichts (Basis- und Vertiefungsmodul)

Einhaltung dieser Norm

8. Dieser Standard legt Anforderungen fest, die es dem Unternehmen ermöglichen, relevante Informationen zu liefern:

   (a) wie sie sich kurz-, mittel- oder langfristig positiv oder negativ auf die Menschen oder die Umwelt ***ausgewirkt*** hat und auswirken wird; und

   (b) wie sich ökologische und soziale Aspekte kurz-, mittel- oder langfristig auf die Finanzlage, die Leistung und den Cashflow des Unternehmens ausgewirkt haben oder auswirken können.

9. Das Unternehmen meldet Informationen, die relevant, wahrheitsgetreu, vergleichbar, verständlich und überprüfbar sind.

10. Je nach Art der von dem Unternehmen ausgeübten Tätigkeiten ist die Aufnahme zusätzlicher Informationen (Kennzahlen und/oder verbale Angaben), die nicht in diesem Standard behandelt werden, angemessen, um Nachhaltigkeitsaspekte offenzulegen, die in der Branche des Unternehmens üblich sind (d. h. die typischerweise bei Unternehmen oder Einrichtungen auftreten, die in einer bestimmten Branche oder einem bestimmten Bereich tätig sind) oder die für das Unternehmen spezifisch sind, da dies die Erstellung relevanter, glaubwürdiger, vergleichbarer, verständlicher und überprüfbarer Informationen unterstützt. Dies schließt die Berücksichtigung von Informationen über Scope-3-THG-Emissionen ein (siehe Paragraphen 50 bis 53 dieses Standards). Anhang B enthält eine Liste von möglichen Nachhaltigkeitsthemen.

11. Das Unternehmen kann die Kennzahlen aus dem Basismodul und dem umfassenden Modul durch zusätzliche qualitative und/oder quantitative Informationen ergänzen, sofern dies gemäß Absatz 10 angemessen ist.

Vergleichende Informationen

12. Das Unternehmen meldet vergleichende Informationen für das Vorjahr, mit Ausnahme von Kennzahlen, die zum ersten Mal veröffentlicht werden. Das Unternehmen meldet vergleichbare Informationen ab dem zweiten Berichtsjahr.

Falls zutreffend, Grundsatz

13. Bestimmte Angaben gelten nur für bestimmte Umstände[2]. In den Anweisungen, die in jeder Angabe enthalten sind, werden diese Umstände und die Informationen genannt, die nur zu melden sind, wenn das Unternehmen sie für "zutreffend" hält. Wird eine dieser Angaben weggelassen, wird davon ausgegangen, dass sie nicht zutreffend ist.

Einbeziehung von Tochtergesellschaften in die gemeldeten Daten

14. Handelt es sich bei dem Unternehmen um die Muttergesellschaft eines Konzerns, so wird empfohlen, den Nachhaltigkeitsbericht auf konsolidierter Basis zu erstellen und dabei auch die Informationen der Tochtergesellschaften einzubeziehen.

15. Wenn das Mutterunternehmen seinen Nachhaltigkeitsbericht auf konsolidierter Basis erstellt hat und dabei auch Informationen seiner Tochterunternehmen einbezieht, sind die Tochterunternehmen von der Berichterstattung befreit.

Zeitpunkt und Ort der Veröffentlichung des Nachhaltigkeitsberichts

16. Wird ein Nachhaltigkeitsbericht erstellt, um den Bedürfnissen großer Unternehmen oder Banken gerecht zu werden, die eine jährliche Aktualisierung verlangen, ist er jährlich zu erstellen. Stellt das Unternehmen einen auf, so ist der Nachhaltigkeitsbericht in einem Zeitraum zu erstellen, der mit der Erstellung des Jahresabschlusses übereinstimmt. Haben sich bestimmte Datenpunkte gegenüber dem vorangegangenen Berichtsjahr nicht geändert, kann das Unternehmen angeben, dass keine Änderungen eingetreten sind, und auf die Informationen verweisen, die für diesen spezifischen Datenpunkt im Vorjahresbericht bereitgestellt wurden.

17. Dieser Bericht dient in erster Linie der Information von tatsächlichen oder potenziellen Geschäftspartnern. Das Unternehmen kann beschließen, seinen Nachhaltigkeitsbericht der Öffentlichkeit zugänglich zu machen. In diesem Fall kann das Unternehmen seinen Nachhaltigkeitsbericht in einem gesonderten Abschnitt des Lageberichts darstellen, wenn

[2] Zum Beispiel die gesetzliche Verpflichtung zur Offenlegung bestimmter Informationen oder die bereits freiwillige Offenlegung bestimmter Informationen im Rahmen eines Umweltmanagementsystems.

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es einen hat. Andernfalls kann das Unternehmen seinen Nachhaltigkeitsbericht als separates Dokument vorlegen.

18. Um zu vermeiden, dass dieselben Informationen doppelt veröffentlicht werden, kann das Unternehmen in seinem Nachhaltigkeitsbericht auf Angaben verweisen, die in anderen Dokumenten veröffentlicht wurden, die gleichzeitig mit dem Nachhaltigkeitsbericht[sind3]. abrufbar

Verschlusssachen und sensible Informationen

19. Wenn die Bestimmungen der Angaben in diesem Standard die Angabe von ***Verschlusssachen*** oder ***sensiblen Informationen*** erfordern, kann das Unternehmen diese Informationen weglassen. Entscheidet sich das Unternehmen dafür, solche Informationen wegzulassen, so ist dies unter Angabe B1 (siehe Paragraph 24) zu vermerken.

Kohärenz und Verknüpfung mit den Offenlegungen in den Jahresabschlüssen

20. Stellt das Unternehmen auch einen auf, müssen die Informationen in seinem Nachhaltigkeitsbericht nach diesem Standard bereitgestellt werden:

    (a) mit den Angaben in den Jahresabschlüssen für denselben Zeitraum übereinstimmen; und

    (b) so dargestellt werden, dass das Verständnis der Zusammenhänge mit den in den Abschlüssen ausgewiesenen Informationen erleichtert wird, z. B. durch die Verwendung geeigneter Querverweise.

[3] In einer künftigen Online-Tool-Version des VSME-Standards kann das Unternehmen gegebenenfalls auf Angaben verweisen, die nicht im Nachhaltigkeitsbericht, sondern in anderen Dokumenten veröffentlicht wurden, indem es auf diese Bezug nimmt. Ein solcher Verweis erfolgt durch Angabe der Seitenzahl der entsprechenden Quelle, sofern das PDF-Format des Quelldokuments auch in der Online-Tool-Version zur Verfügung gestellt wird.

Grundmodul

21. Das Unternehmen berichtet über seine Umwelt-, Sozial- und Geschäftsverhaltensaspekte (zusammen "Nachhaltigkeitsaspekte") unter Verwendung der nachstehenden B1 bis B11-Angaben.

22. Wenn das umfassendere Informationen bereitstellen möchte, kann es auch die unter B1 bis B11 geforderten Kennzahlen in die Angaben integrieren, indem es sie aus dem umfassenden Modul auswählt.

23. Zusätzliche Hinweise zu den Angaben B1 bis B11 sind in den Paragraphen 66 bis 209 zu finden.

Basismodul - Allgemeine Informationen

B1 - Grundlagen der Erstellung

24. Das Unternehmen muss offengelegt werden:

    (a) welche der folgenden Optionen er gewählt hat:

        i. OPTION A: Basismodul (nur); oder

        ii. OPTION B: Basismodul und umfassendes Modul;

    (b) hat das Unternehmen eine Offenlegung unterlassen, weil sie als ***Verschlusssache*** oder ***sensible Information*** gilt (siehe Ziffer 19), so hat das Unternehmen die unterlassene Offenlegung anzugeben.

    (c) ob der Nachhaltigkeitsbericht auf individueller Basis (d. h. der Bericht beschränkt auf die Informationen des Unternehmens) oder auf konsolidierter Basis (d. h. der Bericht enthält Informationen über das Unternehmen und seine Tochtergesellschaften) erstellt wurde;

    (d) im Falle eines konsolidierten Nachhaltigkeitsberichts die Liste der im Bericht behandelten Tochterunternehmen, einschließlich ihrer eingetragenen [Anschrift4]; und

    (e) die folgenden Informationen:

        i. die Rechtsform des Unternehmens;

        ii. Code(s) der NACE-Sektorenklassifikation;

        iii. Umfang der Bilanz (in Euro);

        iv. Umsatz (in Euro);

        v. Anzahl der ***Beschäftigten*** in Kopfzahlen oder Vollzeitäquivalenten;

        vi. Land der Haupttätigkeit und Standort der wesentlichen Vermögenswerte; und

        vii. Geolokalisierung der eigenen, gepachteten oder verwalteten ***Standorte***.

25. Hat das Unternehmen eine Nachhaltigkeitszertifizierung oder ein Nachhaltigkeitssiegel erhalten, so ist eine kurze Beschreibung dieser Zertifikate oder Siegel vorzulegen (gegebenenfalls einschließlich der Aussteller der Zertifizierung oder des Siegels, des Datums und der Bewertungsnote).

B2 - Praktiken, Strategien und künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

26. Hat das Unternehmen spezifische Praktiken, Strategien oder künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft eingeführt, so ist dies anzugeben. Das Unternehmen gibt an, ob es dies getan hat:

    (a) Praktiken. Zu den Praktiken in diesem Zusammenhang können beispielsweise Bemühungen zur Verringerung des Wasser- und Stromverbrauchs des Unternehmens, zur Verringerung der Treibhausgasemissionen oder zur Vermeidung von Umweltverschmutzung und Initiativen zur Verbesserung der Produktsicherheit sowie laufende Initiativen zur Verbesserung der Arbeitsbedingungen und der Gleichbehandlung am Arbeitsplatz, ***Nachhaltigkeitsschulungen*** für die Belegschaft des Unternehmens und Partnerschaften im Zusammenhang mit Nachhaltigkeitsprojekten gehören;

    (b) ***Strategien*** zu Nachhaltigkeitsfragen, ob sie öffentlich zugänglich sind, und etwaige gesonderte Umwelt-, Sozial- oder Unternehmensführungsstrategien zur Behandlung von Nachhaltigkeitsfragen;

[4] Die eingetragene Anschrift ist die offizielle Anschrift des Unternehmens.

(c) künftige Initiativen oder zukunftsweisende Pläne, die zu Fragen der Nachhaltigkeit durchgeführt werden; und

(d) ***Ziele***, um die Umsetzung der ***Politiken*** und die Fortschritte bei der Erreichung dieser Ziele zu überwachen.

27. Zu diesen Praktiken, Strategien und künftigen Initiativen gehört, was das Unternehmen unternimmt, um seine negativen ***Auswirkungen*** zu verringern und seine positiven Auswirkungen auf Mensch und Umwelt zu verstärken, um zu einer nachhaltigeren Wirtschaft beizutragen. Anhang B enthält eine Liste möglicher Nachhaltigkeitsthemen, die in dieser Offenlegung behandelt werden könnten. Das Unternehmen kann für die Berichterstattung über diese Informationen die Vorlage in Ziffer 78 verwenden.

28. Wenn das Unternehmen auch über das umfassende Modul Bericht erstattet, ergänzt es die unter B2 gelieferten Informationen durch die unter C2 aufgeführten Datenpunkte.

Basismodul - Umweltmetriken

B3 - Energie und Treibhausgasemissionen

29. Das Unternehmen gibt seinen Gesamtenergieverbrauch in MWh mit einer Aufschlüsselung gemäß nachstehenden Tabelle an, wenn es die erforderlichen Informationen für eine solche Aufschlüsselung erhalten kann:

	Erneuerbare Energien	Nicht-erneuerbar	Insgesamt
Elektrizität (wie in den Rechnungen der Versorgungsunternehmen angegeben)			
Kraftstoffe			
Insgesamt			

30. Das Unternehmen legt seine geschätzten ***Brutto-Treibhausgasemissionen (THG)*** in Tonnen CO2-Äquivalent ($_{tCO2eq}$) unter Berücksichtigung des Inhalts des GHG Protocol Corporate Standard (Version 2004) offen, einschließlich:

(a) die Scope-1-THG-Emissionen in tCO2eq (aus eigenen oder kontrollierten Quellen); und

(b) die ***standortbezogenen Scope-2-Emissionen*** in $_{tCO2eq}$ (d. h. Emissionen aus der Erzeugung von zugekaufter Energie wie Strom, Wärme, Dampf oder Kälte).

31. Das Unternehmen gibt seine Treibhausgasintensität an, die berechnet wird, indem die gemäß Absatz 30 angegebenen "***Brutto-Treibhausgasemissionen***" durch den gemäß Absatz 24 Buchstabe e Ziffer iv angegebenen "Umsatz (in Euro)" geteilt [werden5].

B4 - Verschmutzung von Luft, Wasser und Boden

32. Ist das Unternehmen bereits aufgrund von Gesetzen oder anderen nationalen Vorschriften verpflichtet, den zuständigen Behörden über seine Schadstoffemissionen zu berichten, oder berichtet es freiwillig im Rahmen eines Umweltmanagementsystems darüber, so legt es die Schadstoffe, die es bei seinen eigenen Tätigkeiten in Luft, Wasser und Boden emittiert, mit der jeweiligen Menge für jeden Schadstoff offen. Sind diese Informationen bereits öffentlich zugänglich, so kann das Unternehmen alternativ auf das Dokument verweisen, in dem die Angaben gemacht werden, z. B. durch Angabe des entsprechenden URL-Links oder durch Einbettung eines Hyperlinks.

B5 - Biologische Vielfalt

33. Das Unternehmen muss die Anzahl und die Fläche (in Hektar) der ***Grundstücke*** offenlegen, die es in einem oder ***in der Nähe*** eines ***biodiversitätsempfindlichen Gebiets*** besitzt, gepachtet hat oder verwaltet.

34. Das Unternehmen kann Metriken zur ***Flächennutzung*** offenlegen:

(a) gesamte Flächennutzung (in Hektar);

[5] In einer zukünftigen Version des Online-Tools der VSME-Norm wird dies automatisch berechnet werden.

(b) gesamte versiegelte Fläche;

(c) gesamte ***naturnahe Fläche*** vor Ort; und

(d) gesamte ***naturnahe Fläche*** außerhalb des Geländes.

B6 - Wasser

35. Das Unternehmen muss seine gesamte ***Wasserentnahme*** offenlegen, d. h. die Wassermenge, die innerhalb der Grenzen der Organisation (oder Einrichtung) entnommen wird; zusätzlich muss das Unternehmen die Wassermenge, die an ***Standorten*** in Gebieten mit hohem Wasserstress entnommen wird, gesondert angeben.

36. Verfügt das Unternehmen über Produktionsprozesse, die in erheblichem Maße Wasser verbrauchen (z. B. thermische Energieprozesse wie Trocknung oder Stromerzeugung, Produktion von Waren, landwirtschaftliche Bewässerung usw.), so muss es seinen ***Wasserverbrauch*** offenlegen, der sich aus der Differenz zwischen der ***Wasserentnahme*** und der Wasserabgabe aus seinen Produktionsprozessen ergibt.

B7 - Ressourcennutzung, Kreislaufwirtschaft und Abfallmanagement

37. Das Unternehmen gibt an, ob es die ***Grundsätze der Kreislaufwirtschaft*** anwendet und wenn ja, wie es diese Grundsätze anwendet.

38. Das Unternehmen muss offengelegt werden:

(a) das gesamte jährliche Abfallaufkommen, aufgeschlüsselt nach Abfallarten (nicht gefährliche und gefährliche Abfälle);

(b) die gesamte jährliche Abfallmenge, die dem ***Recycling*** oder der Wiederverwendung zugeführt wird; und

(c) wenn das Unternehmen in einem Sektor tätig ist, in dem erhebliche Materialströme verwendet werden (z. B. Herstellung, Baugewerbe, Verpackung oder andere), der jährliche Massenstrom der verwendeten Materialien.

Basismodul - Soziale Metriken

B8 - Arbeitskräfte - Allgemeine Merkmale

39. Das Unternehmen legt die Zahl der ***Beschäftigten*** in Kopfzahlen oder Vollzeitäquivalenten für die folgenden Messgrößen offen:

(a) Art des Arbeitsvertrags (befristet oder unbefristet);

(b) Geschlecht; und

(c) Land des Arbeitsvertrags, wenn das Unternehmen in mehr als einem Land tätig ist.

40. Beschäftigt das Unternehmen 50 oder mehr ***Arbeitnehmer***, so ist die Fluktuationsrate für den Berichtszeitraum anzugeben.

B9 - Arbeitskräfte - Gesundheit und Sicherheit

41. Das Unternehmen legt die folgenden Informationen über seine ***Beschäftigten*** offen:

(a) die Anzahl und die Rate der ***registrierbaren*** Arbeitsunfälle; und

(b) die Zahl der Todesfälle infolge von arbeitsbedingten Verletzungen und arbeitsbedingten .

B10 - Arbeitskräfte - Entlohnung, Tarifverhandlungen und Ausbildung

42. Das Unternehmen muss offengelegt werden:

(a) ob ***die Beschäftigten*** ein ***Entgelt*** erhalten, das dem für das Land, in dem das Unternehmen tätig ist, geltenden ***Mindestlohn*** entspricht oder darüber liegt, der direkt durch das nationale Mindestlohngesetz oder durch einen Tarifvertrag festgelegt wird;

(b) das prozentuale ***Lohngefälle*** zwischen seinen weiblichen und männlichen ***Beschäftigten***. Das Unternehmen kann auf diese Angabe verzichten, wenn die Zahl der Beschäftigten unter 150 liegt, wobei zu beachten ist, dass diese Schwelle ab dem 7. Juni 2031 auf 100 Beschäftigte gesenkt wird;

(c) der Prozentsatz der ***Beschäftigten, die*** unter Tarifverträge fallen, und

(d) die durchschnittliche Zahl der jährlichen Weiterbildungsstunden pro ***Arbeitnehmer***, aufgeschlüsselt nach Geschlecht.

Basismodul - Governance-Metriken

B11 - Verurteilungen und Geldstrafen wegen Korruption und Bestechung

43. Im Falle von Verurteilungen und Geldstrafen im Berichtszeitraum gibt das Unternehmen die Anzahl der Verurteilungen und den Gesamtbetrag der Geldstrafen für Verstöße gegen die Gesetze zur Korruptions- und Bestechungsbekämpfung an.

Umfassendes Modul

44. Dieses Modul enthält Angaben, die den Informationsbedarf der Geschäftspartner des Unternehmens, wie z.B. Investoren, Banken und Firmenkunden, zusätzlich zu den im Basismodul enthaltenen Angaben in umfassender Weise erfüllen. Die Angaben in diesem Modul spiegeln die jeweiligen Verpflichtungen der Finanzmarktteilnehmer und Firmenkunden im Rahmen der einschlägigen Gesetze und Vorschriften wider. Sie spiegeln auch die Informationen wider, die die Geschäftspartner benötigen, um das Nachhaltigkeitsrisikoprofil des Unternehmens zu beurteilen, z. B. als (potenzieller) Lieferant oder (potenzieller) Kreditnehmer.

45. Der nachstehende Text enthält eine Liste der Angaben von C1 bis C9, die zu berücksichtigen sind und über die zu berichten ist, wenn sie auf die Geschäftstätigkeit und Organisation des Unternehmens zutreffen. Wird eine dieser Angaben weggelassen, wird davon ausgegangen, dass sie nicht anwendbar ist.

46. Zusätzliche Leitlinien zu den Angaben C1 bis C9 sind in den Paragraphen 210 bis 244 zu finden.

Umfassendes Modul - Allgemeine Informationen

C1 - Strategie: Geschäftsmodell und Nachhaltigkeit - Verwandte Initiativen

47. Das Unternehmen muss die wichtigsten Elemente seines Geschäftsmodells und seiner Strategie offenlegen, einschließlich

    (a) eine Beschreibung der wesentlichen Gruppen der angebotenen Produkte und/oder Dienstleistungen;

    (b) eine Beschreibung der wesentlichen Märkte, auf denen das Unternehmen tätig ist (z. B. B2B, Großhandel, Einzelhandel, Länder);

    (c) eine Beschreibung der wichtigsten Geschäftsbeziehungen (z. B. wichtige Lieferanten, Kunden, Vertriebskanäle und ***Verbraucher***); und

    (d) wenn die Strategie Schlüsselelemente enthält, die sich auf Fragen der Nachhaltigkeit beziehen oder diese beeinflussen, eine kurze Beschreibung dieser Schlüsselelemente.

C2 - Beschreibung von Praktiken, Strategien und künftigen Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

48. Wenn das Unternehmen spezifische Praktiken, ***Strategien*** oder künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft eingeführt hat, über die es bereits unter Angabe B2 im Basismodul berichtet hat, muss es diese kurz beschreiben. Zu diesem Zweck kann das Unternehmen die Vorlage in Absatz 213 verwenden.

49. Das Unternehmen kann gegebenenfalls die höchste Ebene des Unternehmens angeben, die für die Durchführung der Maßnahmen verantwortlich ist.

Umfassendes Modul - Umweltmetriken

Berücksichtigung bei der Berichterstattung über Treibhausgasemissionen unter B3 (Basismodul)

50. Je nach Art der vom Unternehmen durchgeführten Tätigkeiten kann die Angabe einer Quantifizierung seiner Scope-3-THG-Emissionen angemessen sein (siehe Abschnitt 10 dieses Standards), um relevante Informationen über die ***Auswirkungen der Wertschöpfungskette*** des Unternehmens auf den Klimawandel zu erhalten.

51. Scope 3-Emissionen sind ***indirekte THG-Emissionen*** (außer Scope 2), die sich aus der ***Wertschöpfungskette*** eines Unternehmens ergeben. Sie umfassen die Aktivitäten, die den Tätigkeiten des Unternehmens vorgelagert sind (z. B. eingekaufte Waren und Dienstleistungen, eingekaufte Investitionsgüter, Transport von eingekauften Waren usw.), sowie Aktivitäten, die den Tätigkeiten des Unternehmens nachgelagert sind (z. B. Transport und Vertrieb der Produkte des Unternehmens, Verwendung der verkauften Produkte, Investitionen usw.).

52. Wenn das Unternehmen beschließt, diese Kennzahl anzugeben, sollte es sich auf die 15 Arten von Scope-3-THG-Emissionen beziehen, die im GHG Protocol Corporate Standard genannt und im GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard detailliert beschrieben werden. Wenn es über Scope berichtet
3-THG-Emissionen zu berechnen, muss das Unternehmen wesentliche Scope-3-Kategorien (gemäß dem Corporate Value Chain (Scope 3) Accounting and Reporting Standard) auf der Grundlage seiner eigenen Bewertung der relevanten Scope-3-Kategorien einbeziehen. Weitere Anleitungen zu spezifischen Berechnungsmethoden für jede Kategorie finden Unternehmen in den *technischen Leitlinien zur Berechnung von* des GHG-Protokolls *Scope-3-Emissionen*.

53. Legt das Unternehmen bei der Berichterstattung über seine Scope-1- und Scope-2-Emissionen unternehmensspezifische Informationen über seine Scope-3-Emissionen offen, so legt es diese zusammen mit den unter B3 - Energie und Treibhausgasemissionen geforderten Informationen vor.

C3 - Treibhausgasreduktionsziele und Klimawandel

54. Hat das Unternehmen ***Ziele für die*** Verringerung der THG-Emissionen festgelegt, so legt es seine Ziele in absoluten Werten für Scope-1- und Scope-2-Emissionen offen. Hat das Unternehmen Reduktionsziele Scope-3-Emissionen festgelegt, so gibt es im Einklang mit den Ziffern 50 bis 53 auch Ziele für wesentliche Scope-3-Emissionen an. Insbesondere muss es Folgendes angeben:

    (a) das Zieljahr und den Zieljahreswert;

    (b) das Basisjahr und den Basisjahreswert;

    (c) die für ***Ziele*** verwendeten Einheiten;

    (d) den Anteil von Scope 1, Scope 2 und, falls offengelegt, Scope 3, den das Ziel betrifft; und

    (e) eine Liste der wichtigsten Maßnahmen, die sie zur Erreichung ihrer ***Ziele*** durchführen will.

55. Wenn das Unternehmen, das in Sektoren mit hohen Klimaauswirkungen[6] tätig ist, einen Übergangsplan für den verabschiedet hat, kann es Informationen vorlegen, einschließlich einer Erklärung, wie zur Verringerung der Treibhausgasemissionen beiträgt.

56. Ist das Unternehmen in Sektoren mit starken Auswirkungen auf das Klima tätig und verfügt es nicht über einen Übergangsplan für den Klimaschutz, so gibt es an, ob und wann es einen solchen Übergangsplan annehmen wird.

C4 - Klimarisiken

57. Wenn das Unternehmen klimabedingte Gefahren und klimabedingte Übergangsereignisse ermittelt hat, die für das Unternehmen ein großes klimabedingtes Risiko darstellen, muss es:

    (a) beschreiben Sie kurz solche klimabedingten Gefahren und klimabedingte Übergangsereignisse;

    (b) offenlegen, wie es die Exposition und Empfindlichkeit seiner Vermögenswerte, Aktivitäten und ***Wertschöpfungskette*** gegenüber diesen Gefahren und Übergangsereignissen bewertet hat;

    (c) die ***Zeithorizonte*** der ermittelten klimabedingten Gefahren und Übergangsereignisse offenlegen und

    (d) offenlegen, ob sie Maßnahmen ***zur Anpassung an den Klimawandel*** für alle klimabedingten Gefahren und Übergangsereignisse ergriffen hat.

58. Das Unternehmen kann die potenziellen negativen Auswirkungen von Klimarisiken, die sich kurz-, mittel- oder langfristig auf seine finanzielle Leistungsfähigkeit oder seine Geschäftstätigkeit auswirken können, offenlegen und angeben, ob es die Risiken als hoch, mittel oder gering einschätzt.

Umfassendes Modul - Soziale Metriken

C5 - Zusätzliche (allgemeine) Merkmale der Arbeitskräfte

59. Beschäftigt das Unternehmen 50 oder mehr ***Arbeitnehmer***, kann es das Verhältnis von Frauen und Männern auf der Führungsebene für den Berichtszeitraum offenlegen.

60. Beschäftigt das Unternehmen 50 oder mehr ***Arbeitnehmer***, kann es die Zahl der Selbständigen ohne Personal, die ausschließlich für das Unternehmen tätig sind, sowie die Zahl der Leiharbeitnehmer, die von Unternehmen zur Verfügung gestellt werden, die hauptsächlich "Beschäftigungstätigkeiten" ausüben, angeben.

C6 - Zusätzliche Informationen für die eigene Belegschaft - Menschenrechtspolitik und -verfahren

61. Das Unternehmen muss eine Antwort auf die folgenden Fragen geben.

[6] Sektoren mit hoher Klimaauswirkung sind die in den NACE-Abschnitten A bis H und Abschnitt L gemäß der Definition in Anhang I der Verordnung (EG) Nr. 1893/2006 aufgeführten Sektoren.

(a) Verfügt das Unternehmen über einen Verhaltenskodex oder eine ***Menschenrechtspolitik*** für die ***eigene Belegschaft***? (JA/NEIN)

(b) Wenn ja, deckt dies ab:

i. Kinderarbeit (JA/NEIN);

ii. Zwangsarbeit (JA/NEIN);

iii. Menschenhandel (JA/NEIN);

iv. Diskriminierung (JA/NEIN);

v. Unfallverhütung (JA/NEIN); oder

vi. Sonstiges? (JA/NEIN - wenn ja, bitte angeben).

(c) Verfügt das Unternehmen über einen Beschwerdemechanismus für die ***eigene Belegschaft***? (JA/NEIN)

C7 - Schwerwiegende negative Vorfälle im Bereich der Menschenrechte

62. Das Unternehmen muss eine Antwort auf die folgenden Fragen geben:

(a) Hat das Unternehmen bestätigte Vorfälle in der ***eigenen Belegschaft*** im Zusammenhang mit:

i. Kinderarbeit (JA/NEIN);

ii. Zwangsarbeit (JA/NEIN);

iii. Menschenhandel (JA/NEIN);

iv. Diskriminierung (JA/NEIN); oder

v. Sonstiges? (JA/NEIN - wenn ja, bitte angeben).

(b) Falls ja, kann das Unternehmen die ***Maßnahmen*** beschreiben, die zur Behebung der ***Vorfälle*** ergriffen wurden
oben beschrieben.

(c) Sind dem Unternehmen bestätigte ***Vorfälle*** bekannt, in die ***Arbeiter in der Wertschöpfungskette***, ***betroffene Gemeinden***, ***Verbraucher*** und ***Endverbraucher*** verwickelt sind? Wenn ja, bitte angeben.

Stand: 01.02.2026

Umfassendes Modul - Governance-Metriken

C8 - Einnahmen aus bestimmten Sektoren und Ausschluss von den EU-Referenzbenchmarks

63. Ist das Unternehmen in einem oder mehreren der folgenden Sektoren tätig, so sind die entsprechenden Einnahmen in dem/den Sektor(en) anzugeben:

(a) umstrittene Waffen (Antipersonenminen, Streumunition, chemische Waffen und biologische Waffen);

(b) den Anbau und die Erzeugung von Tabak;

(c) Sektor der fossilen Brennstoffe (Kohle, Öl und Gas) (d. h. das Unternehmen erzielt Einkünfte aus der Exploration, dem Abbau, der Förderung, der Produktion, der Verarbeitung, der Lagerung, der Raffination oder dem Vertrieb, einschließlich des Transports, der Lagerung und des Handels, von fossilen Brennstoffen gemäß der Definition in Artikel 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates17), einschließlich einer Aufschlüsselung der Einkünfte aus Kohle, Öl und Gas; oder

(d) die Herstellung von Chemikalien, wenn das Unternehmen ein Hersteller von Pestiziden und anderen agrochemischen Produkten ist.

64. Das Unternehmen legt offen, ob es von EU-Referenzbenchmarks ausgeschlossen ist, die an das Pariser Abkommen angepasst sind, wie in Absatz 241 der Leitlinien beschrieben.

C9 - Geschlechtervielfalt in den Leitungsorganen

65. Verfügt das Unternehmen ein Leitungsorgan, so legt es den entsprechenden Anteil der Geschlechtervielfalt offen.

Grundmodul: Beratung

66. Der nachstehende Leitfaden ist als Teil eines Ökosystems gedacht, zu dem auch die weiterer Leitfäden durch die EFRAG, weiterer digitaler Hilfsmittel und Umsetzungshilfen (Bildungsmaßnahmen, Einbeziehung von Interessengruppen) gehören wird, die das Verständnis einiger der technischen Elemente des Leitfadens erleichtern sollen.

67. Dieser Leitfaden unterstützt Unternehmen, die das Basismodul anwenden möchten.

Basismodul Leitfaden - Allgemeine Informationen B1

- Grundlagen der Vorbereitung

68. Bei der Berichterstattung über die Rechtsform des Unternehmens nach nationalem Recht gemäß Absatz 24 Buchstabe e) Ziffer i) kann das Unternehmen zwischen einer der folgenden Unternehmensstrukturen wählen:

    (a) private Gesellschaft mit beschränkter Haftung

    (b) Einzelfirma

    (c) Partnerschaft

    (d) Genossenschaft

    (e) andere (bitte nach den länderspezifischen Vorschriften für Rechtsformen angeben).

69. Bei der Berichterstattung über den/die NACE-Code(s) des Unternehmens gemäß Absatz 24 Buchstabe e Ziffer ii handelt es sich bei den NACE-Codes (Nomenclature statistique des Activités économiques dans la Communauté Européenne) um in der Europäischen Union verwendete Klassifikationen der Wirtschaftszweige. Sie bieten einen standardisierten Rahmen für die Einteilung der Wirtschaftszweige in Sektoren, der Vergleichbarkeit und ein gemeinsames Verständnis zwischen den verschiedenen EU-Ländern ermöglicht.

70. Der NACE-Code besteht aus einer Anzahl von Ziffern, die je nach dem Grad der Spezifität, mit dem der Wirtschaftszweig identifiziert wird, zwischen 2 und 5 liegt. Die Liste der NACE-Codes ist im folgenden Dokument zu finden: VERORDNUNG (EG) Nr. 1893/2006.

Ebene Nr	Kennung	Beschreibung
1	Abschnitt	Die Abschnitte sind mit einem Buchstaben gekennzeichnet und definieren 21 allgemeine Wirtschaftsbereiche wie Landwirtschaft, verarbeitendes Gewerbe oder Handel.
2	Abteilung	Die Abteilung wird durch einen zweistelligen Zahlencode identifiziert und kennzeichnet einen bestimmten Sektor innerhalb des allgemeinen Wirtschaftsraums. Insgesamt gibt es 88 Abteilungen.
3	Gruppe	Die Gruppe wird durch einen dreistelligen numerischen Code identifiziert (der auch die beiden Ziffern der Abteilung berücksichtigt) und definiert ein bestimmtes Gebiet innerhalb des Sektors. Es etwa 270 Gruppen.
4	Klasse	Die Klasse wird durch einen vierstelligen Zahlencode identifiziert (unter Berücksichtigung der Ziffern der Abteilung und der Gruppe) und definiert eine bestimmte Aktivität innerhalb der Gruppe. Es gibt etwa 450 Klassen.

71. Bei der Meldung der Zahl der ***Beschäftigten*** gemäß Absatz 24 Buchstabe e) Ziffer v) ist das Vollzeitäquivalent (VZÄ) die Zahl der Vollzeitstellen in einem Unternehmen. Es kann berechnet werden, indem die geplanten Arbeitsstunden eines Arbeitnehmers (die gesamten effektiv geleisteten Arbeitsstunden in einer Woche) durch die Stunden des Arbeitgebers für eine Vollzeit-Arbeitswoche (die gesamten von Vollzeitbeschäftigten geleisteten Stunden) geteilt werden. Ein Arbeitnehmer, der zum Beispiel 25 Stunden pro Woche für ein Unternehmen arbeitet, in dem die Vollzeitwoche 40 Stunden beträgt, entspricht einem VZÄ von 0,625 (d. h. 25/40 Stunden).

72. Der Personalbestand ist die Gesamtzahl der Beschäftigten des Unternehmens zu einem bestimmten Zeitpunkt.

73. Bei der Berichterstattung über das Land der Haupttätigkeit und den Standort wesentlicher Vermögenswerte gemäß Paragraph 24 Buchstabe e) Ziffern vi) und vii) hat das Unternehmen diese Informationen für jeden seiner ***Standorte*** anhand der nachstehenden Tabelle anzugeben:

Standorte	Adresse	Postleitzahl	Stadt	Land	Koordinaten (Geolokalisierung)
Eingetragener Sitz (z.B.)					
Lagerhaus (z.B.)					
Industrielle Anlage (z.B.)					

74. Die geografische Lage eines Unternehmens dürfte für die Beteiligten ein wertvoller Datenpunkt für die Bewertung der mit dem KMU verbundenen Risiken und Chancen sein, insbesondere in Bezug auf die Nachhaltigkeitsthemen ***Anpassung an den Klimawandel***, Wasser, Ökosysteme und biologische Vielfalt.

75. Die Geolokalisierung erfolgt in Form von Raumpunkten für einzelne Einheiten oder Polygonpunkten, die die Grenzen eines größeren, weniger einheitsähnlichen ***Geländes***, z. B. eines Betriebs, eines Bergwerks oder einer Anlage, definieren. Das Unternehmen kann auch eine Gruppe von Punkten angeben, die eine einfache Identifizierung des betreffenden Gebiets ermöglichen. Die Raumpunkte sind als Koordinaten mit fünf Dezimalstellen anzugeben (z. B. 0° 00′ 0,036″).

76. Bei der Offenlegung der Geolokalisierung von ***Standorten,*** die dem Unternehmen gehören, von ihm gepachtet sind oder von ihm verwaltet werden, gibt das Unternehmen die Koordinaten der Standorte in der Tabelle in Absatz 73 an. Das Unternehmen kann Web-Mapping-Tools (z. B. Google Maps, Apple Maps) verwenden, um die Koordinaten der Standorte zu ermitteln, die ihm gehören, die es gepachtet hat oder die es verwaltet. Das Unternehmen kann auch geeignete Software-Tools oder -Plattformen verwenden, um den Umkreis oder die Fläche größerer Standorte zu ermitteln.

77. In Bezug auf Ziffer 25 kann die Nachhaltigkeitszertifizierung registrierte Umweltzeichen aus einem EU-, nationalen oder internationalen Kennzeichnungssystem umfassen, die der Haupttätigkeit eines KMU entsprechen. Das EU-Umweltzeichen gilt beispielsweise für bestimmte Produkte wie Textilien und Schuhe, Bodenbeläge (z. B.), Reinigungs- und Körperpflegemittel, elektronische Geräte oder Möbel. Das Unternehmen kann die Produktgruppen des EU-Umweltzeichens und den Produktkatalog für weitere Informationen konsultieren.

B2 - Praktiken, Strategien und künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

78. Die Unternehmen können die folgende Vorlage für die Berichterstattung über B2-Datenpunkte verwenden.

	Verfügen Sie über bestehende Nachhaltigkeitspraktiken/-politiken/zukünftige Initiativen, die sich mit einem der folgenden Nachhaltigkeitsthemen befassen? [JA/NEIN]	Sind sie öffentlich zugänglich? [JA/NEIN]	Gibt es Zielvorgaben für die Politik? [JA/NEIN]
Klimawandel			
Verschmutzung			
Wasser und Meeresressourcen			

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Biologische Vielfalt und Ökosysteme			
Kreislauf wirtschaft			
Eigene Arbeitskräfte			
Beschäftigte in der Wertschöpfungskette			
Betroffene Gemeinschaften			
Verbraucher und Endnutzer			
Geschäftsgebaren			

79. Handelt es sich bei dem Unternehmen um eine Genossenschaft, kann es Angaben machen:

    (a) die wirksame Beteiligung von Arbeitnehmern, Nutzern oder anderen interessierten Parteien oder Gemeinschaften an der Verwaltung;
    (b) Finanzinvestitionen in das Kapital oder die Vermögenswerte von Einrichtungen der Sozialwirtschaft im Sinne der Empfehlung des Rates vom 29. September 2023 (mit Ausnahme von Spenden und Beiträgen); und
    (c) etwaige Beschränkungen der Gewinnausschüttung im Zusammenhang mit dem mutualistischen Charakter oder der Art der Tätigkeiten, die in der Erbringung von Dienstleistungen von allgemeinem wirtschaftlichen Interesse (DAWI) bestehen.

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Anleitung für die eigene Belegschaft, die Arbeitnehmer in der Wertschöpfungskette, die betroffenen Gemeinden sowie die Verbraucher und Endverbraucher

80. Zum Verständnis der Nachhaltigkeitsthemen, die sich auf soziale und Menschenrechte beziehen, finden Sie in Anhang B eine Liste möglicher Nachhaltigkeitsthemen. Anhand dieser Liste kann festgestellt werden, ob die Politiken, Praktiken oder künftigen Initiativen darauf abzielen, negative ***Auswirkungen*** auf die Menschenrechte umfassend anzugehen, oder ob sie auf bestimmte Gruppen betroffener Stakeholder (z. B. Arbeitnehmer in der vorgelagerten ***Wertschöpfungskette***) beschränkt sind. Im Rahmen dieser Offenlegung können die Unternehmen auch angeben, ob sie über ein Verfahren zur Behandlung von Beschwerden im Zusammenhang mit Menschenrechten verfügen.

<u>Basismodul Leitfaden - Umweltmetriken</u> B3 - Energie und Treibhausgasemissionen

Auswirkungen auf das Klima: Energienutzung und Treibhausgasemissionen

81. In den Paragraphen 29 und 30 berichtet das Unternehmen über seine ***Klimaauswirkungen*** und macht Angaben zu seinem Energieverbrauch und seinen ***Treibhausgasemissionen***. Dieser Leitfaden für die Offenlegung B3 stellt keinen zusätzlichen Datenpunkt zu den in den Paragraphen 29 (zum Energieverbrauch) und 30 (zu den Treibhausgasemissionen) beschriebenen Angaben dar, sondern gibt vielmehr ein übergeordnetes Ziel vor und liefert den Kontext für die Basisoffenlegung B3.

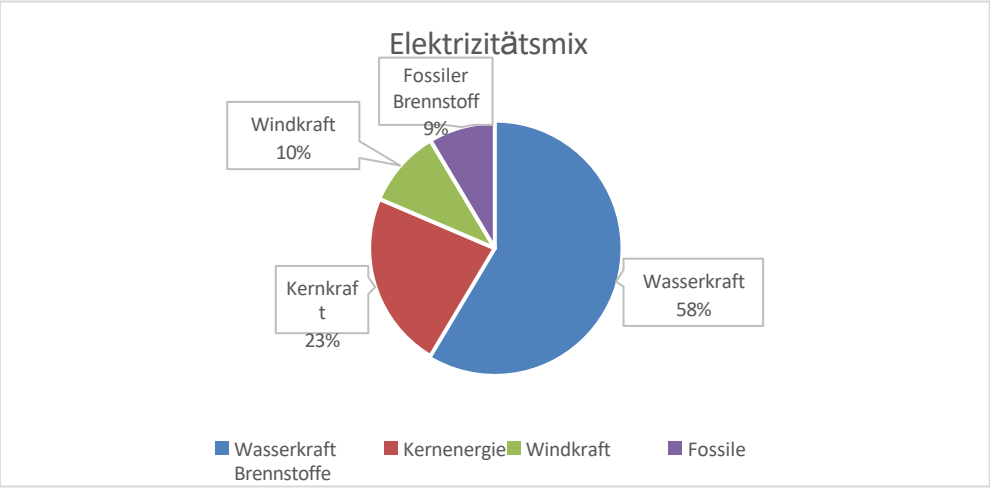
Energieverbrauch

82. ***Die Auswirkungen auf*** das Klima werden maßgeblich durch den Energieverbrauch bestimmt. Daher ist es wichtig, sowohl die Menge als auch die Art - z. B. fossile Brennstoffe wie Kohle, Öl und Gas gegenüber ***erneuerbaren Energien*** - und den Mix der verbrauchten Energie offenzulegen. Beispiele für Angaben zum Energieverbrauch sind der Gesamtenergieverbrauch, aufgeschlüsselt nach fossilen Brennstoffen und Elektrizität. Es können auch andere Aufschlüsselungen angegeben werden, z. B. der Verbrauch von gekauftem oder selbst erzeugtem Strom aus erneuerbaren Energiequellen. Es folgt ein Beispiel für die in Absatz 29 geforderten Informationen.

	Erneuerbare Energien Verbrauch von Energie (MWh)	**Verbrauch nicht-erneuerbarer Energie (MWh)**	**Gesamt 202(x) Energieverbrauch (MWh)**
Elektrizität (wie in den Rechnungen der Versorgungsunternehmen angegeben)	300	186	486
Kraftstoffe	3	7	10
Insgesamt	303	193	496

83. Kauft das Unternehmen fossile Brennstoffe (z. B. Erdgas, Erdöl) oder erneuerbare Brennstoffe (z. B. Biokraftstoffe wie Biodiesel und Bioethanol) zur Erzeugung von Strom, Wärme oder Kälte für den Eigenverbrauch, muss es eine Doppelzählung vermeiden. Daher verbucht das Unternehmen den Energiegehalt des gekauften Brennstoffs nur als Brennstoffverbrauch, aber es verbucht oder meldet seinen aus diesem Brennstoff erzeugten Strom- und Wärmeverbrauch nicht noch einmal. Im Falle der Stromerzeugung aus erneuerbaren Energien wie Sonnen- oder Windenergie - und wenn kein Brennstoffeinsatz erforderlich ist - verbucht das Unternehmen die erzeugte und verbrauchte Strommenge als Stromverbrauch.

84. Das Unternehmen darf seinen Energieverbrauch nicht durch seine Energieerzeugung ausgleichen, auch wenn die vor ***Ort*** erzeugte Energie an Dritte verkauft und von diesen genutzt wird. Das Unternehmen vermeidet auch eine Doppelzählung des Brennstoffverbrauchs, wenn es den Verbrauch von selbst erzeugter Energie angibt. Erzeugt das Unternehmen Elektrizität aus einer nicht erneuerbaren oder erneuerbaren Brennstoffquelle und verbraucht die erzeugte Elektrizität anschließend, so wird der Energieverbrauch nur einmal unter dem Brennstoffverbrauch erfasst. Der Anteil des Verbrauchs ***an erneuerbarer Energie*** kann auf der Grundlage von Herkunftsnachweisen, Zertifikaten für erneuerbare Energie oder der in der Stromrechnung angegebenen Stromzusammensetzung berechnet werden. Die Stromrechnung kann sich auf die verbrauchten Stromeinheiten beziehen und den Prozentsatz des aus erneuerbaren Energiequellen stammenden Stroms angeben und wie in der folgenden Abbildung dargestellt werden.



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85. Bei der Erstellung der in Absatz 29 geforderten Informationen über den Energieverbrauch lässt das Unternehmen Rohstoffe und Brennstoffe, die nicht für energetische Zwecke verbrannt werden, unberücksichtigt. Das Unternehmen, das Brennstoffe als Einsatzstoffe verbraucht, kann Informationen über diesen Verbrauch getrennt von den vorgeschriebenen Angaben offenlegen.

Umrechnung zwischen verschiedenen Energieeinheiten

86. Die Unternehmen müssen ihren Energieverbrauch in Form von Endenergie angeben, d h. der Energiemenge, die an das Unternehmen geliefert wird, z. B. die Megawattstunden (MWhStrom, die vom Versorgungsunternehmen gekauft werden, Dampf, der von einer nahe gelegenen Industrieanlage bezogen wird, oder Diesel, der an Tankstellen gekauft wird. Elektrizität bezieht sich ausdrücklich auf Wärme, Dampf und Kälte. Brennstoffe umfassen alles, was verbrannt wird, z. B. Gas, Erdgas, Biomasse usw.

87. In Absatz 29 wird MWh als bevorzugte Einheit für die Messung des Energieverbrauchs angegeben. Bei Brennstoffen oder Biomasse ist eine Umrechnung in MWh erforderlich, wenn die Daten in anderen Einheiten wie Energiegehalt (z. B. kJ, Btu), Volumen (z. B. Liter, m³) oder Masse (z. B. metrische Tonnen, kurze Tonnen) ausgedrückt werden.

88. Für den nach Masse gemessenen Brennstoffverbrauch (z. B. Holz, Kohle) sollte das Unternehmen:

    (a) den unteren Heizwert (z. B. , TJ/g) des Brennstoffs zu ermitteln (dies kann ein typischer Wert sein, der von zuverlässigen Quellen, z. B. IPCC, veröffentlicht wird, oder er kann vom Lieferanten bereitgestellt oder intern ermittelt werden);

    (b) den unteren Heizwert z.B. in MWh/Tonne umrechnen:

    1 TJ= ^{1012} J= 277,78 MWh ; 1 Gg= 109 g = 1.000 t

    11,9 TJ/Gg= 11,9 * 277,78/1000 t= 3,31 MWh/Tonne; und

    (c) z. B. den Energiegehalt der Masse berechnen:

    1.245.345 t * 3,31 MWh/Tonne= 4.117.111 MWh.

89. Für flüssige Brennstoffe sollten die Unternehmen:

    (a) Volumenangaben in Masse umrechnen, indem das Volumen mit der Kraftstoffdichte

    multipliziert wird, z. B. Diesel = 4,456,000 l; Dichte von Diesel = 0,84 kg/l

    4.456.000 (l) * 0,84 (kg/l)= 3.43.040 kg= 3.743 t;

    (b) Berechnung des Energiegehalts durch Multiplikation der Masse mit dem unteren Heizwert, z. B. 3,743 [t] * 43 [TJ/Gg]= 3.743 t * 43 TJ/(1.000 [t])= 160,95 [TJ] ; und

    (c) TJ in MWh umrechnen, zum Beispiel 1 TJ= ^{1012} J= 277,778 MWh

    160,95 [TJ]= 277,78 [MWh/TJ] * 160,95 [TJ]= 44.708 MWh.

Dokumentation Quelle:

Daten	*Dokumentation Quelle*
CDP	CDP Technical Note: Umrechnung von Brennstoffdaten in MWh https://cdn.cdp.net/cdp-production/cms/guidance_docs/pdfs/000/000/477/original/CDP-Conversion-of-fuel-data-to-MWh.pdf?1479755175

Treibhausgasemissionen

90. Was die ***Brutto-Treibhausgasemissionen*** (THG) betrifft, die sich aus den Tätigkeiten des Unternehmens ergeben, so stützt sich die Anforderung in Absatz 30 auf die Definitionen und Regeln des THG-Protokolls, des führenden Rechnungslegungsstandards für THG-Emissionen. Gemäß Paragraph 30 die Unternehmen über ihre Scope-1- und Scope-2-Emissionen berichten. Scope 1-THG-Emissionen umfassen direkte Emissionen aus eigenen oder kontrollierten Quellen. Scope-2-Emissionen sind ***indirekte THG-Emissionen***, die sich aus den Aktivitäten des berichtenden Unternehmens ergeben (da sie aus der vom Unternehmen verbrauchten Energie stammen), die jedoch aus Quellen stammen, die sich im Besitz oder unter der Kontrolle eines anderen Unternehmens befinden. Weitere Hinweise zur Berechnung von Scope-1- und Scope-2-Emissionen finden Sie in den folgenden Abschnitten.

91. Scope 1- und 2-Emissionen können in folgendem Format gemeldet werden.

	202(x) Treibhausgasemissionen (t_{CO2e})
Umfang 1	45
Bereich 2	6
Insgesamt	51

92. Das GHG-Protokoll ist ein globaler Standard für die Messung, die Berichterstattung und das Management von Treibhausgasemissionen und gewährleistet Konsistenz und Transparenz. Der Unternehmensstandard umfasst Leitlinien für Scope-1-, Scope-2- und Scope-3-Emissionen für Unternehmen und andere Organisationen (NGOs, Behörden usw.).

93. Um eine faire Darstellung der Emissionen des Unternehmens zu gewährleisten, hat das GHG-Protokoll eine Liste von Berichterstattungsgrundsätzen aufgestellt:

    (a) Relevanz: Sicherstellung, dass das Treibhausgasinventar die Treibhausgasemissionen der Organisation widerspiegelt.

    (b) Vollständigkeit: Gewährleistung, dass das Treibhausgasinventar alle Treibhausgasemissionsquellen und -tätigkeiten innerhalb der gewählten Grenzen erfasst;

    (c) Kohärenz: Gewährleistung der Kohärenz der angewandten Methodik, um Vergleiche im Zeitablauf zu ermöglichen;

    (d) Transparenz: Offenlegung der bei der Berechnung der Treibhausgasemissionen verwendeten Annahmen, Referenzen und Methoden; und

    (e) Genauigkeit: Sicherstellung, dass die Daten über Treibhausgasemissionen hinreichend genau sind, damit die Nutzer Entscheidungen treffen können.

94. Alternativ zum Treibhausgasprotokoll können Unternehmen auf die ISO-Norm 14064-1 zurückgreifen, wenn diese für ihre Berichterstattungsanforderungen besser geeignet ist.

95. Bei der Berichterstattung über THG-Emissionen ist es wichtig, die richtigen Grenzen festzulegen, um sicherzustellen, dass das THG-Inventar korrekt ist und die Emissionen nicht doppelt gezählt werden. Das GHG-Protokoll definiert zwei Hauptarten von Grenzen - organisatorische oder operative Grenzen.

    (a) Organisatorische Grenzen: Das GHG-Protokoll definiert sie als die Grenzen, die die Tätigkeiten bestimmen, die dem berichtenden Unternehmen gehören oder von ihm kontrolliert werden, je nach dem gewählten Konsolidierungsansatz. Es gibt zwei Ansätze zur Konsolidierung von Emissionen - den Equity- oder den Control-Ansatz. Das Unternehmen wählt den Ansatz, der seinen Gegebenheiten entspricht.

    (b) Der Equity-Share-Ansatz bezieht sich auf die Bilanzierung von Treibhausgasemissionen aus dem Betrieb entsprechend dem Anteil am Eigenkapital des Betriebs.

    (c) Bei der Anwendung des Kontrollansatzes erfasst das Unternehmen die Treibhausgasemissionen aus Tätigkeiten, über die es entweder die finanzielle oder die operative Kontrolle hat. Die Unternehmen verwenden entweder das Kriterium der operativen Kontrolle oder das der finanziellen Kontrolle, wenn sie diesen Ansatz zur Konsolidierung und Erfassung ihrer Emissionen im Bericht verwenden.

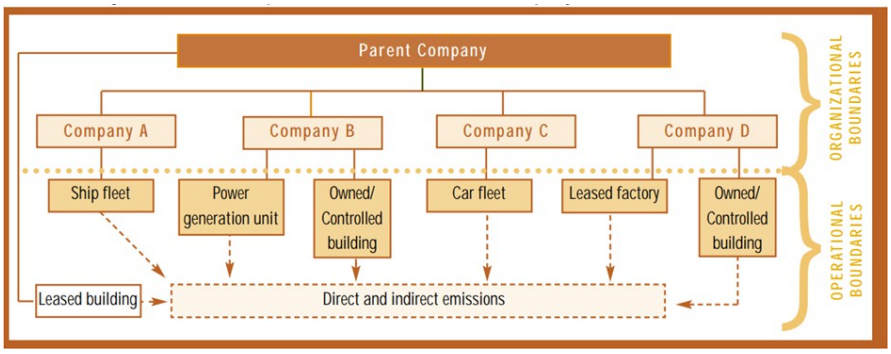
        i. Finanzielle Kontrolle bedeutet, dass das Unternehmen die finanzielle Kontrolle über das Unternehmen ausübt, wenn es die Möglichkeit hat, die Finanz- und Geschäftspolitik des Unternehmens zu bestimmen, um aus dessen Tätigkeit wirtschaftlichen Nutzen zu ziehen.

        ii. Betriebliche Kontrolle bedeutet, dass ein Unternehmen die betriebliche Kontrolle über einen Betrieb hat, wenn das erstgenannte Unternehmen oder eines seiner Tochterunternehmen die uneingeschränkte Befugnis hat, seine betriebliche Politik in diesem Betrieb einzuführen und umzusetzen.

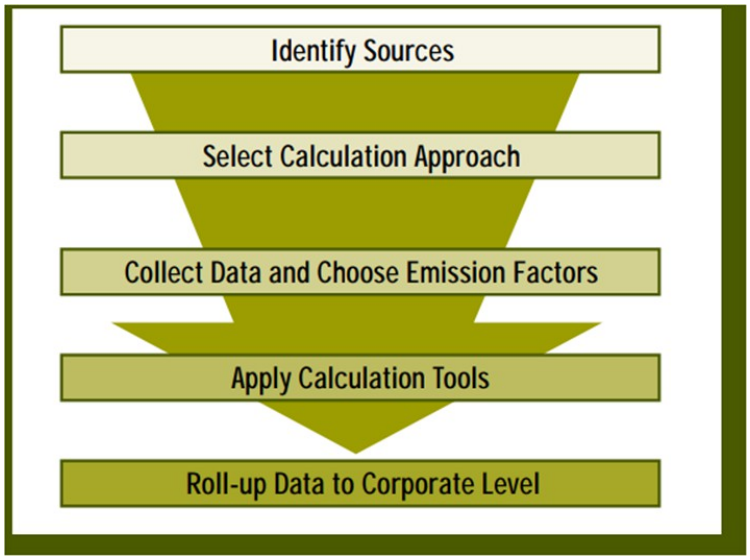
    (d) Operative Grenzen: Das GHG-Protokoll definiert sie als die Grenzen, die die direkten und indirekten Emissionen im Zusammenhang mit den Tätigkeiten bestimmen, die dem berichtenden Unternehmen gehören oder von ihm kontrolliert werden. Diese Bewertung bietet einem Unternehmen die Möglichkeit, festzustellen, welche Tätigkeiten und Quellen direkte (Scope 1) und indirekte Emissionen (Scope 2 und Scope 3) verursachen, und zu entscheiden, welche indirekten Emissionen aus seinen Tätigkeiten einbezogen werden sollen.

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(e) Die Überlegungen zur Abgrenzung müssen den oben genannten Grundsätzen entsprechen (zeitliche Konsistenz, Transparenz bei der Dokumentation und Vollständigkeit) und sind in der folgenden Abbildung dargestellt[7].



96. Das Treibhausgasprotokoll enthält auch Leitlinien und Schritte zur Ermittlung, Berechnung und Verfolgung von Treibhausgasemissionen, wie in der nachstehenden Abbildung dargestellt[8].



97. Private und öffentliche Initiativen haben verschiedene Instrumente entwickelt, um Unternehmen bei der Erstellung ihres THG-Emissionsinventars zu unterstützen und die mit seiner Erstellung verbundenen Herausforderungen zu erleichtern:

(a) Berechnungsinstrumente und Leitlinien des GHG-Protokolls: https://ghgprotocol.org/calculation- tools-and-guidance

(b) KMU-Klimadrehscheibe: https://smeclimatehub.org/start-measuring/

(c) Business Carbon Calculator von Normative: https://businesscarboncalculator.normative.io/en/

(d) Carbon Trust Carbon Footprint Calculator für KMU: https://www.carbontrust.com/our-work-and-impact/guides-reports-and-tools/sme-carbon-footprint-calculator

(e) UK Business Climate hub: https://businessclimatehub.uk/carbon-footprint-calculators/

Leitlinien für Scope-1- und standortbezogene Scope-2-Emissionen

98. Typische Scope-1-Emissionen sind CO_2- (sowie CH4- und N_2O-) Emissionen im Zusammenhang mit der Verbrennung von Brennstoffen (z. B. in Heizkesseln, Öfen, Fahrzeugen usw.) und diffuse Emissionen aus Klimaanlagen und industriellen Prozessen.

[7] Greenhouse Gas Protocol Unternehmensstandard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol- revised.pdf

[8] Greenhouse Gas Protocol Unternehmensstandard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol- revised.pdf

99. ***Der standortbezogene Scope 2*** umfasst Emissionen aus Strom, Wärme, Dampf und Kälte, die vom berichtenden gekauft oder erworben und verbraucht werden. Er spiegelt die durchschnittliche Emissionsintensität der Netze wider, in denen der Energieverbrauch stattfindet, und verwendet meist netzdurchschnittliche Emissionsfaktordaten. Typische Quellen von Scope-2-Emissionen sind alle Geräte, die Strom (Elektromotoren, Beleuchtung, Gebäude usw.), Wärme (Heizung in Industrieprozessen, Gebäuden usw.), Dampf (Industrieprozesse) und Kälte (Industrieprozesse, Gebäude usw.) verbrauchen.

100. Die Bewertung von Treibhausgasemissionen kann auf verschiedene Weise erfolgen, z. B. durch Berechnung, Messung oder eine Kombination aus Messung und Berechnung. Ein gängiger Ansatz ist die Berechnung mit Hilfe von Emissionsfaktoren (EF), die auch das Treibhauspotenzial (GWP) des Treibhausgases beinhalten können. Direkte Messungen mit Sensoren (Durchfluss und Konzentration) können ebenfalls angewandt werden. In der nachstehenden Tabelle sind die gängigsten Methoden zusammengefasst.

THG Bewertungsmethode	Einzelheiten	Erforderliche Daten
Messung	Multiplikation der direkt gemessenen Gasmengen mit ihrem jeweiligen Treibhauspotenzial.	Direkte Menge des emittierten Gases aus der Gasmessung (Durchfluss, Konzentration, Volumen) Globales Erwärmungspotenzial (GWP) der Gase
Berechnung von	Multiplikation der Aktivitätsdaten mit dem Emissionsfaktor (EF), der das globale Erwärmungspotenzial (GWP) integriert	Tätigkeitsdaten Emissionsfaktoren (EF)

101. In der obigen Tabelle werden die folgenden Begriffe eingeführt:

(a) Aktivitätsdaten, die in der Regel der Menge des verbrauchten Brennstoffs entsprechen. Sie können in Energieeinheiten (z. B. MWh), Volumen (z. B. m³ oder l) oder Masse (z. B. Tonnen oder kg) ausgedrückt werden. Das Unternehmen kann diese Daten durch Einsichtnahme in die Kaufquittungen für Brennstoffe oder in die Rechnungen der Versorgungsunternehmen einsehen:

(b) das Erderwärmungspotenzial, das die ***Auswirkungen*** des jeweiligen Treibhausgases auf das Klima im Vergleich zu einer äquivalenten Einheit Kohlendioxid quantifiziert; und

(c) Emissionsfaktoren (FE), die angeben, wie viel Treibhausgas pro Tätigkeitseinheit emittiert wird. Die Emissionsfaktoren berücksichtigen häufig das Treibhausgaspotenzial (GWP) des Treibhausgases, das das Unternehmen in diesem Fall nicht zu berücksichtigen braucht.

102. Die nachstehende Tabelle enthält eine nicht erschöpfende Auflistung von Quellen, aus denen die Unternehmen leicht Zugang zu den Emissionsfaktoren (FE) und dem Treibhauspotenzial (GWP) erhalten können. Die Unternehmen können auch auf maßgebliche nationale Quellen verweisen, die für ihre Verhältnisse relevanter sein können.

Emissionsfaktoren (FE)	ADEME - Basis Empreinte® IPCC - Datenbank der Emissionsfaktoren IPCC - Leitlinien für nationale Treibhausgasinventare Association of Issuing Bodies (AIB) - Residual Mix Grid Emission Factors JRC - Historischer Treibhausgas-Emissionsfaktor für den Stromverbrauch Lebenszyklus-Emissionsfaktoren für die Stromerzeugung USEPA-THG-Emissionsfaktoren Hub Von der Regierung veröffentlichte Emissionsfaktoren und Referenzwertekanadischen Jährliche Treibhausgasemissionsfaktoren der IEA für die Länder der Welt bei der Strom- und Wärmeerzeugung (Datensatz 2022, bezahlter Datensatz)
Globales Erwärmungspotenzial (GWP)	IPCC - Globales Erwärmungspotenzial

103. Die Unternehmen können auch weitere Leitlinien und Instrumente für Maßnahmen und Berichte über ihre Treibhausgasemissionen und ***Klimaauswirkungen*** unter https://smeclimatehub.org/ finden.

Beispiel für die Berechnung von Scope-1-Emissionen

104. Unternehmen A verbrennt Heizöl Nr. 4 in einem Industriekessel. Für seine Finanzbuchhaltung verfolgt es seine Kosten, und für THG-Buchhaltung verfolgt es die Mengen (m³), die sich in seinen Brennstoffbelegen widerspiegeln. Anhand der Quittungen werden die jährlich gekauften Mengen an Heizöl ermittelt und der Heizölbestand am ersten Kalendertag des Jahres erfasst. Im Jahr 2023 hat sie 100 m³ Heizöl gekauft. Nach ihren Aufzeichnungen hatte sie am 1. Januar 2023 2,5 m³ und am 1. Januar 2024 1 in ihren Vorräten. Somit stellt sie (durch Kauf und Messung des Bestands) fest, dass sie im Jahr 2023 101,5 m³ Heizöl verbraucht hat.

105. Anhand der IPCC-Liste der Emissionsfaktoren (Tabelle 2.3, Seite 2.18) schätzt er seinen Emissionsfaktor für eine fifty-fifty-Mischung aus Dieselöl und Rückstandsöl auf 75,75 t $_{CO2/TJ}$ und bestimmt anhand der veröffentlichten Energiestatistiken, dass sein unterer Heizwert des Brennstoffs 0,03921 TJ/m³ beträgt. Da der CO2-GWP gleich eins ist, beträgt die CO2-Emission für diese spezifische Scope-1-Quelle:

$$101{,}5\ m^3 * 0{,}03921\ TJ/m^3 * 75{,}75\ t_{CO2/TJ} * 1 = 301{,}5\ t_{CO2}$$

106. Der Vollständigkeit halber werden in diesem Beispiel auch die CH4- und N2O-Emissionen berechnet. Ein Blick auf die IPCC-Liste der Emissionsfaktoren zeigt, dass jeweils 3 kg CH4/TJ und 0,6 kg $_{N2O/TJ}$, d.h. die Emissionen betragen:

$$\text{CH4-Emissionen} = 101{,}5\ m^3 * 0{,}03921\ TJ/m^3 * 3\ kg_{CO2/TJ} * 29{,}8 = 0{,}36\ _{tCO2e}\ \text{N2O-}$$

$$\text{Emissionen} = 101{,}5\ m^3 * 0{,}03921\ TJ/m^3 * 0{,}6\ kg\ CO2/TJ * 273 = 0{,}65\ tCO2e$$

107. Wie bereits erwähnt, tragen die CH4- und N2O-Emissionen etwa 1 tCO2e zum CO2-Wert von 301,5 $_{tCO2}$ bei, was etwa 0,3 % des Gesamtwerts entspricht. Dies kann als akzeptabler Berichtsfehler angesehen werden und hätte daher nicht berechnet und gemeldet werden dürfen. Die Erderwärmungspotenziale für $_{CH4}$ und $_{N2O}$ sind dem Sechsten Bewertungsbericht des IPCC, Kapitel 7SM[9], .entnommen

Beispiel für die Berechnung von Scope-2-Emissionen

108. Unternehmen A bewohnt ein 2000 $^{m2\ großes}$ Bürogebäude in Paris, in dem es den Stromverbrauch für die Zentralheizung und -kühlung, die Beleuchtung, die Computer und andere elektrische Anlagen wie Geräte bezahlt. Anhand seiner Stromrechnungen hat es geschätzt, dass das Gebäude im Jahr 2022 282 MWh Strom verbraucht hat. Unter Verwendung des von nowtricity.com bereitgestellten Emissionsfaktors für Frankreich im Jahr 2022 schätzt das Unternehmen seine Scope-2-Emissionen für den Stromverbrauch des Gebäudes auf

$$Emissions_{GHG} = 282\ 000\ [kWh] * 73\ [\frac{gCO_{2)}eq}{kWh} = 20{,}6\ \text{t}\ eq$$

109. Die Unternehmen können auch ihre marktbasierten Scope-2-Zahlen angeben. Emissionsfaktoren für marktbasierte Scope-2-Emissionen spiegeln die vertraglichen Vereinbarungen des Unternehmens mit seinen Energielieferanten wider. Marktbasierte Emissionsfaktoren können von ihren Strom- oder Wärmelieferanten zur Verfügung gestellt werden, aber auch durch den eigenen Kauf von Energieattribut-Zertifikaten oder Stromabnahmeverträgen (PPA) oder die Verwendung von Restmix-Emissionsfaktoren .unterstützt werden

B4 - Verschmutzung von Luft, Wasser und Boden

Leitlinien dazu, welche Unternehmen über Umweltverschmutzung berichten müssen und über welche Schadstoffe die Unternehmen berichten .

110. In Absatz 32 ist festgelegt, dass das Unternehmen die Schadstoffe, die es im Rahmen seiner eigenen Tätigkeit in Luft, Wasser und Boden emittiert, offenlegt, wenn diese Informationen bereits aufgrund gesetzlicher Vorschriften den zuständigen Behörden oder im Rahmen eines Umweltmanagementsystems mitgeteilt werden müssen. Dies bedeutet, dass das Unternehmen zunächst prüft, ob es solche bereits meldet, entweder als gesetzliche

[9] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, und M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Klimawandel 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)). Verfügbar unter https://www.ipcc.ch/.

vorgeschrieben oder freiwillig. Meldet das Unternehmen bereits Informationen über Schadstoffemissionen (oder ist es gesetzlich dazu verpflichtet), so übermittelt es weitere Informationen über diese Emissionen gemäß den Anforderungen in Ziffer 32. Berichtet das Unternehmen jedoch noch nicht über solche Informationen (und ist es auch nicht gesetzlich dazu verpflichtet), muss es dies lediglich angeben.

111. Im Allgemeinen wird erwartet, dass diese Anforderung für Unternehmen gilt, die Betreiber einer Industrieanlage oder einer Intensivtierhaltungsanlage sind, die unter die Richtlinie über Industrie- und Tierhaltungsemissionen (IED 2.0) fallen, mit der die Richtlinie über Industrieemissionen (IED) geändert wurde. Die IED 2.0 gilt für etwa 75.000 Anlagen in Europa und umfasst Tätigkeiten wie die Verbrennung von Brennstoffen in Kesseln mit einer Nennleistung von mehr als 50 MW, das Gießen in Metallgießereien, die Verarbeitung von Nichteisenmetallen, die Herstellung von Kalk, die Herstellung von keramischen Erzeugnissen durch Brennen, die Herstellung von Pflanzenschutzmitteln oder Bioziden, die Aufzucht von Schweinen oder Geflügel mit 380 Großvieheinheiten oder mehr, das Gerben von Häuten, Schlachthöfe usw. In diesen Fällen muss die Anlage der zuständigen Behörde bereits die in Luft, Wasser und Boden freigesetzten Schadstoffe melden, und die Daten sind über die Verordnung über das Industrieemissionsportal (IEPR) öffentlich zugänglich, das das Europäische zur Erfassung der Freisetzung und Schadstoffen Register Übertragung von (E-PRTR) ersetzt. Unternehmen, die mehr als eine Betriebsstätte betreiben, müssen im Rahmen des EPRTR nicht über ihre konsolidierten unternehmensweiten Emissionen berichten, da sie nur auf Betriebsebene berichten. Dieser Standard verlangt die Berichterstattung über die Gesamtmenge der Schadstoffe aller Betriebe. Ebenso müssen Unternehmen, die eine Betriebsstätte besitzen, aber nicht betreiben, keine Berichte im Rahmen des E-PRTR vorlegen, doch wird von ihnen erwartet, dass sie die Emissionen der Betriebsstätte in ihrem Nachhaltigkeitsbericht angeben.

112. Gleiches gilt, wenn ein Unternehmen im Rahmen eines Umweltmanagementsystems, wie z. Beiner EMAS- oder ISO 14001-Zertifizierung, zur Überwachung und Berichterstattung über die im E-PRTR aufgeführten Schadstoffe verpflichtet ist. Dies sind im Prinzip relevante Aspekte, die das Unternehmen in seinen Nachhaltigkeitsbericht aufnehmen muss.

113. Hat ein Unternehmen nur eine Betriebsstätte oder ist es nur in einer Betriebsstätte tätig und sind seine Daten über die Umweltverschmutzung bereits öffentlich zugänglich, so kann das Unternehmen auf das Dokument verweisen, in dem diese Informationen enthalten sind, anstatt sie noch einmal zu melden. Ebenso kann das Unternehmen, wenn es einen organisationsweiten Bericht wie z. B. einen EMAS-Bericht veröffentlicht, der Daten zur Umweltverschmutzung enthält, diese durch Verweis in den Nachhaltigkeitsbericht aufnehmen.

114. Um Informationen über Schadstoffe im Nachhaltigkeitsbericht zu melden, sollte das Unternehmen die Art des Schadstoffmaterials angeben, über das berichtet wird, sowie die in Luft, Wasser und Boden emittierte Menge in einer geeigneten Masseneinheit (z. B. t oder kg).

115. Nachstehend finden Sie ein Beispiel dafür, wie Unternehmen Informationen über ihre Emissionen in Luft, Wasser und Boden, aufgeschlüsselt nach Schadstoffarten, vorlegen können.

Schadstoff	**Emissionen (kg)**	**Medium der Freisetzung (Luft, Wasser, Boden)**
z.B. Cadmium und Verbindungen	10	Wasser
Art des Schadstoffs 2		
Art des Schadstoffs 3		

116. Hinsichtlich der Arten von Schadstoffen, die bei der Berichterstattung gemäß Absatz 32 zu berücksichtigen sind, kann sich das Unternehmen auf die folgenden Hauptschadstoffe beziehen, die derzeit unter das EU-Recht fallen. Dennoch muss jedes Unternehmen die spezifischen Schadstoffe berücksichtigen, die von den Rechtsvorschriften in seinem jeweiligen Zuständigkeitsbereich erfasst werden.

117. Beispiele für die wichtigsten Luftschadstoffe (Dir. 2024/299; Reg. 2024/1244; EC, 2024; EEA, 2022) sind: Schwefeloxide (Sox/SO2 - z. B. aus Energieerzeugung und Heizung in der Industrie), Stickstoffoxide (NOx/NO2 - z. B. aus dem Verkehr), flüchtige organische Verbindungen ohne Methan (NMVOC - z. B. aus landwirtschaftlichen Tätigkeiten), Kohlenmonoxid (CO - z.z. B. aus der Verbrennung fossiler Brennstoffe), Ammoniak (NH3 - z. B. bei der Ausbringung und Lagerung von Dung), Feinstaub (PM10 - z. B. aus der Verbrennung in der Produktion, im Verkehr, bei landwirtschaftlichen Tätigkeiten), Schwermetalle (Cd, Hg, Pb, As, Cr, Cu, Ni, Zn), POPs (PAHs insgesamt, HCB, PCBs, Dioxine/Furane), ozonabbauende Stoffe oder 'ODS'

(Fluorchlorkohlenwasserstoffe (FCKW), teilhalogenierte Fluorchlorkohlenwasserstoffe (H-FCKW), Halone), schwarzer Kohlenstoff (BC - z. B. aus dem Energieverbrauch) usw.

118. Laut dem von der Allianz für saubere Luft verabschiedeten Leitfaden für Unternehmen über Luftschadstoffemissionen gehören zu den wichtigsten Quellen für Luftschadstoffemissionen im privaten Sektor (die auch für die gesamte ***Wertschöpfungskette*** von großer Bedeutung sind) (a) Stromerzeugung aus der Verbrennung von fossilen Brennstoffen oder Biomasse (die extern erzeugt, über ein nationales Netz verteilt und dann entlang der Wertschöpfungskette verbraucht werden kann); (b) direkte stationäre Verbrennung von fossilen Brennstoffen oder Biomasse im Rahmen der Tätigkeiten oder industriellen Prozesse eines Unternehmens oder der Betrieb stationärer Maschinen oder anderer Tätigkeiten, die die Verbrennung von Brennstoffen erfordern; (c) Verkehr (Güterverkehr, Straßen-, Schienen-, Schiffs- und Luftverkehr, Geländefahrzeuge, wie sie in der Landwirtschaft oder im Baugewerbe eingesetzt werden); d) industrielle Prozesse (alle anderen Emissionen, die nicht auf die Verbrennung von Brennstoffen zurückzuführen sind und bei industriellen Prozessen anfallen); e) Landwirtschaft (Viehzucht und Güllewirtschaft, Pflanzenbau, wie Verbrennung von Ernterückständen, Ausbringung von Dung und Düngemitteln); f) Abfallbeseitigung (z. B. Deponierung, Verbrennungz. B. Deponierung, Verbrennung oder offene Verbrennung oder Kompostierung).

119. Der Leitfaden stellt ein Beispiel für eine einfache Methodik zur Erstellung des Luftschadstoff-Emissionsinventars eines Unternehmens und zur Berechnung der Emissionen der jeweiligen Luftschadstoffe dar. Diese Methodik gliedert sich in die folgenden Schritte; mit Ausnahme der Abbildung der ***Wertschöpfungskette***, wie sie der VSME-Standard vorsieht, sind die in dieser Offenlegungsanforderung geforderten Informationen auf der Ebene des berichtenden Unternehmens zu berichten: (1) Identifizierung von Emissionsquellen innerhalb der Wertschöpfungskette, (2) Identifizierung von Methoden zur Quantifizierung von Emissionen, (3) Sammlung von Tätigkeitsdaten, (4) Identifizierung von Emissionsfaktoren und (5) Quantifizierung von Emissionen. Der Leitfaden enthält eine Zuordnung der Verschmutzungsquellen zu den Methoden für die Berechnung von Informationen über die Emissionen der wichtigsten Luftschadstoffe (Tabelle unten).

Quellen der Verschmutzung	**Methodik für Quantifizierung der Emissionen (Abschnitt im Leitfaden)**
Elektrizität	Abschnitt 4,1
Verbrennung von Kraftstoff	Abschnitt 4,2
Transport	Abschnitt 4,3
Industrielle Prozesse	Abschnitt 4,4
Landwirtschaft	Abschnitt 4,5
Abfall	Abschnitt 4,6

120. Im Folgenden wird ein Beispiel für eine Berechnungsmethode für Luftschadstoffemissionen anhand der Methode für das verarbeitende Gewerbe aus dem oben genannten Leitfaden dargestellt. In dem betrachteten Beispiel ist Mp die Menge des in der ***Wertschöpfungskette*** eines Unternehmens verwendeten (oder produzierten) Materials M, das mit dem Verfahren p hergestellt wurde (Tonnen, Liter); EFk,p ist der Emissionsfaktor für den Schadstoff k für das Verfahren p (g Produktionseinheit-1); Emk,p sind die Emissionen des spezifischen Schadstoffs k für das Verfahren p (g).

$$Emk_{,p} = {}_{Mp} * EFk_{,p}$$

121. Ein mittelgroßer Schokoladenhersteller, der im Jahr 2022 1.750 Tonnen Schokolade produziert, würde zur Berechnung seiner NMVOC-Emissionen den Standardemissionsfaktor 2 anwenden, was zu folgender Berechnung führen würde:

1.750 Tonnen Schokolade * 2 (Emissionsfaktor von NMVOCs)= 3.500 Tonnen NMVOC-Emissionen.

122. Der Verkehr kann eine weitere bedeutende Quelle der Luftverschmutzung innerhalb des eigenen Betriebs und auf Ebene ***der Wertschöpfungskette*** sein. In diesem Fall muss das Unternehmen zur Schätzung der Emission eines bestimmten Schadstoffs aus dem beispielsweise die folgende Formel verwenden, wobei FCv,f der Kraftstoffverbrauch des Fahrzeugtyps v mit dem Kraftstoff f (kg) ist; EFk,v,f ist der Emissionsfaktor für den Schadstoff k für den Fahrzeugtyp v und den Kraftstoff f (g Fahrzeug-km-1); Emk,v,f steht für die Emissionen des spezifischen Schadstoffs k für den Fahrzeugtyp v und den Kraftstoff f (g).

$$Emk_{,v,f} = FCv_{,f} * EFk_{,v,f}$$

123. Ein mit Diesel betriebenes leichtes Nutzfahrzeug, das im Jahr 2022 insgesamt 2 800 km zurückgelegt hat, verursachte beispielsweise die folgende Menge an PM10-Emissionen (PM10-Emissionsfaktor von 1,52 g/kg):

$$2.800 \text{ km} * 1{,}52 = 4.256 \text{ Gramm}_{\text{PM10-Emissionen}}.$$

124. Die Verbrennung von Brennstoffen ist eine weitere kritische Quelle für Luftemissionen. In diesem Fall kann eine Formel beispielsweise wie folgt lauten: FCn ist der in der Quellenkategorie verbrauchte Brennstoff n (Gj); EFk ist der Emissionsfaktor für diesen Schadstoff k (g/Gj); und Emk sind die Emissionen des spezifischen Schadstoffs k (g).

$$Emk = FCn * EFk;$$

125. Ein Unternehmen, das im Jahr 2020 beispielsweise 3.000.000 Gramm Kraftstoff verbraucht, wird einen EF von 0,67 für SO2 haben, was bedeutet, dass:

$$3.000.000 * 0{,}67 = 2.010.000 \text{ Gramm}_{\text{SO2-Emissionen}} \text{ aus der Kraftstoffverbrennung im Jahr 2020.}$$

126. Beispiele für die wichtigsten Wasserschadstoffe (Verordnung 2024/1244; Richtlinie 2000/60/EG; Richtlinie 2006/118/EG; Richtlinie 91/676/EWG; Richtlinie 2010/75/EU; und Änderungsrichtlinie. 2024/1785; EUA, 2024) sind: Stickstoff (N), Phosphor (P), Schwermetalle (Cd, Hg, Pb sowie As, Cr, Cu, Ni, Zn), POPs und Pestizide, BTEX (Benzol, Toluol, Ethylbenzol, Xylole) und andere flüchtige organische Verbindungen (VOC), Stoffe, die die Sauerstoffbilanz ungünstig beeinflussen (gemessen anhand von Parametern wie BSB, CSB usw.), organischer Gesamtkohlenstoff (TOC) usw.

127. Pestizide und Nährstoffe (z. B. N und P) können durch landwirtschaftliche Tätigkeiten freigesetzt werden (EUA, 2023; UNEP, 2023) (z. B. durch Ausbringung von Gülle oder anorganischem Dünger). Schwermetallkonzentrationen können aus dem Bergbau und aus Abwassereinleitungen stammen. TOC ist ein allgemeiner Indikator für die Verunreinigung von Wasser mit organischen Stoffen, der auf das Vorhandensein von lebendem Material hinweist, z. B. in Abwässern, aber auch in Oberflächen- und Grundwasser (übliche Konzentrationswerte von weniger als 10 $^{mgl-1}$ bzw. 2 $^{mgl-1}$). Der CSB weist weitgehend auf das Vorhandensein von Industrieabwässern oder Abwasser hin, wobei Werte in der Regel unter 20 $^{mgl-1}$ in unverschmutzten Gewässern liegen und Industrieabwässer Werte von bis zu 60.000 $^{mgl-1}$ erreichen. Der BSB wird normalerweise zur Bestimmung der Verschmutzung durch organische Stoffe in Oberflächengewässern sowie für die Effizienz der Abwasserbehandlung verwendet und weist in der Regel Werte um 2 $^{mgl-1}$ in unverschmutzten Gewässern und 10 $^{mgl-1}$ und mehr in verschmutzten Gewässern auf. Die Freisetzung von flüchtigen organischen Verbindungen (VOC) kann das Ergebnis von Freisetzungen in Gewässer sein.

128. Was die Methodik zur Messung der Emissionen in das Wasser betrifft, so empfiehlt die EUA ein einfaches Schätzverfahren, das dem für die oben genannten Luftschadstoffe verwendeten ähnelt. In der nachstehenden Formel ist ARa die Aktivitätsrate für die Tätigkeit a (die auf der Grundlage der spezifischen Tätigkeit oder des Prozesses zu wählen ist; siehe z. B. Mp in der obigen Berechnung der Luftemissionen); EFp,a ist der Emissionsfaktor für den Schadstoff p für die Tätigkeit a; und Emissionsp,a sind die Emissionen des spezifischen Schadstoffs p für die Tätigkeit a.

$$Emissionenp_{,a} = ARa * EFp_{,a}$$

129. Beispiele für die wichtigsten in den Boden emittierten Schadstoffe (Verordnung 2024/1244; Richtlinie 86/278/EWG) sind: N, P, Schwermetalle (z.B. Klärschlammausbringung), BTEX und andere VOC, POP und Pestizide.

130. Insgesamt sind die privatwirtschaftlichen Quellen der Bodenverschmutzung vor allem Produkte oder Nebenprodukte industrieller Prozesse (z. B. Herstellung von Chemikalien, Energie, Textilien), unfallbedingte Freisetzungen von Erdölprodukten, Viehzucht und landwirtschaftliche Tätigkeiten (z. B. Bewässerung mit unbehandeltem Abwasser, Geflügelzucht), Herstellung und Behandlung von Abwasser, Herstellung und Verarbeitung von Metallen und Mineralien sowie Transport (FAO, 2021).

131. In Australien und Südafrika beispielsweise stehen Unternehmen je nach ihren Möglichkeiten einige Schätzungsoptionen zur Verfügung: direkte Messung (z. B. Probenahme, kontinuierliches Überwachungssystem), Massenbilanz, technische Berechnungen, Emissionsfaktoren (dieselbe Formel wie oben für Emissionen in Luft und Wasser) usw. Der allgemeine Ansatz zur Berechnung solcher Emissionen besteht darin: 1) Ermittlung der Emissionsquellen innerhalb der Anlage (Verbrennung, Herstellung, Lösungsmittelverdampfung, Lagerung, flüchtige Emissionen); 2) Bestandsaufnahme der verfügbaren Informationen;
3) in der Liste der Schätzungsmethoden die für den zu bewertenden Prozess am besten geeignete Methode, die verfügbaren Informationen und die Messinstrumente zu ermitteln, die zur Gewinnung der benötigten Daten erworben werden können; 4) die für jede Methode erforderlichen Daten zu sammeln; und 5) die Emissionen zu berechnen. Die Handbücher enthalten mehrere Formeln und Beispiele für jede Methode der Emissionsberechnung.

132. Eine Liste von Emissionsfaktoren für Luftschadstoffe findet sich auf der entsprechenden Website der EUA. Obwohl Emissionsfaktoren eher für die Luftverschmutzung verwendet werden, hat die WHO einige Faktoren für die Ableitung in Oberflächengewässer und die Entsorgung im Boden für bestimmte Prozesse zur Verfügung gestellt. Zusätzliche Emissionsfaktoren für POPs können hier .eingesehen werden

133. Es ist zu beachten, dass die Anforderungen gemäß Paragraph 32 nur für KMU gelten, die in bestimmten Sektoren tätig sind. Unternehmen, die an der Erbringung von Dienstleistungen beteiligt sind (z B. im Rahmen der Zusammenarbeit oder der gemeinsamen Nutzung von Einrichtungen oder aus der Ferne), fallen in der Regel nicht in den Anwendungsbereich dieser Offenlegung. Im Gegensatz dazu haben Unternehmen, die Produktionstätigkeiten durchführen (z. B. Chemikalien), im Allgemeinen ***Auswirkungen*** in Form von Umweltverschmutzung und sollten daher im Rahmen dieser Offenlegung Bericht erstatten. Die nachstehende Tabelle (in Anlehnung an den EMAS-Leitfaden) enthält Beispiele für sektorale Auswirkungen, auch für Bürodienstleistungen, bei denen umweltbezogene Aspekte möglicherweise nicht von Bedeutung sind.

Tätigkeit	Umweltaspekt	Auswirkungen auf die Umwelt
Transport	- verbrauchte Maschinenöle, Kraftstoffverbrauch - Kraftfahrzeugemissionen - Reifenabrieb (Feinstaub)	- **Boden-, Wasser- und Luftverschmutzung** - Treibhauseffekt, Lärm
Bauwesen	- Verbrauch von Primärrohstoffen (Ressourcen) - Luftemissionen, Lärm, Vibrationen, usw. Von Baumaschinen - Flächenverbrauch	- Rohstoffverfügbarkeit - Lärm, **Boden, Wasser, Luftverschmutzung** - Zerstörung der Bodendecke - Biodiversitätsverlust
Bürodienstleistungen	- Verbrauch von Materialien (z. B. Papier, Toner) - Stromverbrauch (führt zu indirekten CO2-Emissionen)	- Erzeugung von gemischten Siedlungsabfällen - Treibhauseffekt
Chemische Industrie	- Verbrauch von Primärrohstoffen (Ressourcen) - Abwasser - Emissionen von flüchtigen organischen Verbindungen - Emissionen von Ozon abbauenden Stoffen	- Rohstoffverfügbarkeit - **Wasserverschmutzung** - fotochemisches Ozon - **Zerstörung der Ozonschicht**

Quellen für die Dokumentation:

Daten	*Dokumentation Quelle*
EMAS-Benutzerhandbuch	https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_part1_0.pdf
Ein praktischer Leitfaden für Unternehmen: Beurteilung von Luftschadstoffemissionen	https://www.ccacoalition.org/sites/default/files/resources/files/CCAC%20SEI%20-%20A%20Practical%20%20Guide%20For%20Business%20-%20Updated_Final%202023.pdf

Verordnung (EU) 2024/1244 (IEPR)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401244
Richtlinie 2010/75/EU (IED) & Änderung in Richtlinie (EU) 2024/1785 (IED 2.0)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20110106 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202401785#d1e40- 42-1
Berechnung der Emissionen in das Wasser - eine vereinfachte Methode	https://www.eionet.europa.eu/etcs/etc- icm/products/etc-icm-reports/berechnung-der-emissionen-in-wasser-eine-vereinfachte-methode
Handbuch zur Emissionsabschätzung (Australien)	https://www.dcceew.gov.au/sites/default/files/documents/softdrink.pdf
Ein Leitfaden für die Berichterstattung und Schätzung von Emissionen für das integrierte Schadstoff- und Abfallinformationssystem	https://sawic.environment.gov.za/documents/297.pdf
EMEP/EEA-Leitfaden für das Verzeichnis der Luftschadstoffemissionen 2023	https://efdb.apps.eea.europa.eu/?source=%7B%22query%22%3A%7B%22match_all%22%3A%7B%7D%7D%2C%22display_type%22%3A%22tabular%22%7D
Zusammenfassung der Techniken zur Abschätzung der Freisetzung von Chemikalien aus Produkten (OECD)	https://www.oecd.org/content/dam/oecd/en/publications/reports/2017/01/resource-compendium-of-prtr- release-estimation-techniques-part-4-summary-of- techniques-for-estimating-releases-of-chemicals-from-products_a3b37c3f/29018220-de.pdf

Stand: 01.02.2026

B5 - Biologische Vielfalt

Leitfaden zur Ermittlung von Standorten in oder in der Nähe von Gebieten mit empfindlicher biologischer Vielfalt

134. In Absatz 33 ist festgelegt, dass das Unternehmen die ***Standorte***, an denen es tätig ist und die sich in oder ***in der Nähe von Gebieten mit empfindlicher biologischer Vielfalt*** befinden, bekannt geben muss. Biodiversitätssensible Gebiete sind durch besondere Naturschutzvorschriften auf europäischer oder internationaler Ebene als solche definiert. Dazu gehören Gebiete, die zum gehören, UNESCO-Welterbestätten und Schlüsselgebiete für die biologische Vielfalt (Key Biodiversity Areas - KBA) sowie andere Schutzgebiete, die von staatlichen Behörden als besonders schutzbedürftig ausgewiesen wurden (z. B. Waldschutzgebiete oder Gebiete innerhalb von Flussgebietseinheiten).

135. Zur Ermittlung von Schutzgebieten und ***biodiversitätsgefährdeten Gebieten*** kann das Unternehmen auf Datenbanken wie die World Database on Protected Areas (WDPA) (eine globale Datenbank zur Ermittlung von Meeres- und Landschutzgebieten), die World Database on Key Biodiversity Areas und die Rote Liste der bedrohten Arten der IUCN . zurückgreifenDas Unternehmen kann auch Instrumente wie das Integrated Biodiversity Assessment Tool (IBAT) .verwenden

136. Im Zusammenhang mit B5 - Biologische Vielfalt bezieht sich der Begriff ***"in der Nähe"*** auf ein Gebiet, das sich (teilweise) mit einem ***für die biologische Vielfalt empfindlichen Gebiet*** überschneidet oder an ein solches angrenzt.

137. Die folgende Tabelle zeigt, wie Informationen über ***Standorte*** in oder in der Nähe von ***Gebieten mit empfindlicher biologischer Vielfalt*** dargestellt werden können.

Standort	**Bereich** (Hektar)	**Empfindliches Gebiet für biologische Vielfalt**	**Spezifikation**

			(in/neben biodiversitätssensiblen Gebieten gelegen)
Land - Standortname 1			
Land - Standortname 2			
Land - Standortname 3			
...			

Quellen für die Dokumentation:

Daten	*Dokumentation Quelle*
Natura 2000 Netzwerk von Schutzgebieten	https://natura2000.eea.europa.eu/
Wichtige Gebiete der biologischen Vielfalt - IUCN	https://www.keybiodiversityareas.org/sites/searc h
UNESCO - Welterbezentrum	https://whc.unesco.org/en/list/

Stand: 01.02.2026

*Anleitung zur Berechnung und Meldung der **Flächennutzung***

138. ***Unter "versiegelter Fläche"*** ist eine Fläche zu verstehen, bei der der ursprüngliche Boden überdeckt wurde (z. B. Straßen, Gebäude, Parkplätze), wodurch er undurchlässig geworden ist und sich auf die Umwelt ***auswirkt***.

139. Grünfläche oder "***naturnahe Fläche***" ist eine Fläche, die in erster Linie der Erhaltung oder Wiederherstellung der Natur dient. Naturnahe/grüne Flächen können sich auf dem ***Gelände*** der Organisation befinden und können Dächer, Fassaden, Wasserableitungssysteme oder andere Merkmale umfassen, die zur Förderung der biologischen Vielfalt gestaltet, angepasst oder verwaltet werden. Naturnahe Flächen können sich auch außerhalb des Geländes der Organisation befinden, wenn sie sich im Besitz der Organisation befinden oder von ihr verwaltet werden und in erster Linie der Förderung der biologischen Vielfalt dienen.

140. Bei der Offenlegung gemäß Absatz 34 muss das Unternehmen nicht nur die lokalen ***Auswirkungen*** berücksichtigen, sondern auch die direkten und indirekten Auswirkungen auf die biologische Vielfalt (z. B. durch Rohstoffgewinnung, Beschaffung, Lieferkette, Produktion und Produkte, Transport und Logistik sowie Marketing und Kommunikation).

141. Die folgende Tabelle zeigt, wie die Informationen über die ***Flächennutzung*** dargestellt werden können.

Art der Landnutzung	**Bereich** (Hektar oder m^2)		
	Voriges Jahr	**Berichtsjahr**	**Veränderung in %**
Versiegelte Fläche insgesamt			

Gesamte naturnahe Fläche vor Ort			
Gesamtes naturnahes Gebiet außerhalb des Geländes			
Gesamtnutzung der Flächen			

Quellen für die Dokumentation:

Daten	*Dokumentation Quelle*
EMAS-Leitlinien	Verordnung 2018/2026 der EU-Kommission https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2026 &rid=2 Benutzerhand buch https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_teil1_0.pdf

Stand: 01.02.2026

B6 - Wasser

Anleitung zur Berechnung und Berichterstattung über Wasserentnahmen und Wasserverbrauch

142. ***Die Wasserentnahme*** bezieht sich auf die Wassermenge, die ein Unternehmen während des Berichtszeitraums innerhalb seiner Organisationsgrenzen aus einer beliebigen Quelle bezieht. In der Praxis bezieht sich dies bei den meisten Unternehmen auf die aus dem öffentlichen Wasserversorgungsnetz entnommene Wassermenge, wie sie in den Rechnungen der Versorgungsunternehmen angegeben ist. umfasst die Wasserentnahme jedoch auch Wassermengen, die aus anderen Quellen entnommen werden, wie Grundwasser aus eigenen Brunnen, Wasser aus Flüssen oder Seen oder Wasser, das von anderen Unternehmen bezogen wird. Im besonderen Fall von Unternehmen, die in der Landwirtschaft tätig sind, würde die Wasserentnahme auch Regenwasser umfassen, wenn es direkt gesammelt und vom Unternehmen gespeichert wird.

143. Daten zur ***Wasserentnahme*** können aus Messungen mit Durchflussmessern oder aus Wasserrechnungen gewonnen werden; in der Praxis bezieht sich die Wasserentnahme bei den meisten Unternehmen auf die aus dem öffentlichen Wasserversorgungsnetz entnommene Wassermenge, wie sie auf den Rechnungen der Versorgungsunternehmen angegeben ist. In Fällen, in denen direkte Messungen nicht durchführbar sind oder als nicht ausreichend erachtet werden und daher ergänzt werden müssen, können die Daten zur Wasserentnahme z. B. anhand von Berechnungsmodellen und Industriestandards geschätzt werden.

144. Im Falle einer Bürogemeinschaft oder eines Coworking Space könnte eine mögliche Methode zur Berechnung der ***Wasserentnahme*** darin bestehen, die Gesamtwasserentnahme des Gebäudes aus der Wasserrechnung zu entnehmen und die Wasserentnahme pro ***Mitarbeiter*** mit der folgenden Gleichung zu berechnen:

Wasserentnahme pro Mitarbeiter täglich (L)= Jährliche Wasserentnahme (L) / (Anzahl der Mitarbeiter im gesamten gemeinsamen Gebäude x Anzahl der Arbeitstage).

Das Unternehmen könnte dann die Wasserentnahme pro Mitarbeiter mit der Anzahl seiner Mitarbeiter und den Tagen, an denen sie im Berichtsjahr gearbeitet haben, multiplizieren, um die endgültige Zahl für den Datenpunkt zu erhalten.

Als Zahlenbeispiel für die Anwendung der vorgeschlagenen Formel ergibt sich aus der Wasserrechnung eines Coworking Space eine jährliche Wasserentnahme von 1296 m3 (entsprechend 1296000 l),

Coworking Space, in dem 100 Beschäftigte verschiedener Unternehmen an einer angenommenen Anzahl von 240 Tagen im Jahr zusammenarbeiten. Die Annahme über die durchschnittliche Anzahl der Arbeitstage kann z. B. auf nationalen Statistiken beruhen. Die tägliche Wasserentnahme pro Mitarbeiter würde in diesem Fall betragen:

Wasserentnahme pro Mitarbeiter täglich= 1296000 L / (100x240)= 54 L

145. Unter der Annahme, das berichtende Unternehmen 25 ***Mitarbeiter beschäftigt*** und diese den Coworking Space an 220 Tagen im Jahr nutzen, wäre die jährliche ***Wasserentnahme*** des Unternehmens im Coworking Space die Wasserentnahme pro Mitarbeiter multipliziert mit der Anzahl der Mitarbeiter und der Arbeitstage, also 54Lx25x220 = 297000 L (entspricht 297 m3).

146. Diese Berechnung könnte nützlich sein, wenn es möglich istauf die Wasserrechnung gemeinsamen Gebäudes zuzugreifen. Diese einfache Berechnungsmethode weist einige Einschränkungen auf, da sie z. B. die unterschiedliche Nutzung der verschiedenen Gebäudeteile nicht berücksichtigt (z. B. könnten in einem siebenstöckigen Gebäude sechs Stockwerke für Büros und ein Stockwerk für eine Kantine oder ein Restaurant vorgesehen sein), die das Unternehmen möglicherweise überwinden kann, wenn zusätzliche Daten zur Verfügung stehen und die oben als Beispiel angeführte Grundberechnung weiter verfeinert wird.

147. Ein alternativer Weg zur Ermittlung der Wasserentnahmedaten im Beispiel der Gemeinschaftsbüros, wenn es nicht möglich ist, die Wasserrechnung abzurufen, könnte darin bestehen, die Wasserentnahmedaten unter Verwendung der Durchflussraten der Armaturen und der Belegungsdaten als primäre Eingaben zu berechnen. Eine mögliche Formel könnte lauten:

Wasserentnahme insgesamt = ∑(Durchflussmenge×Anzahl der Nutzungen pro Tag×Anzahl der Tage pro Jahr×Belegung) wobei:

(a) Die Durchflussmengen der einzelnen Geräte können z. B. aus den Projektunterlagen oder den Etiketten der Geräte entnommen oder auf der Grundlage von öffentlich zugänglichen Durchschnittsdaten geschätzt werden, wenn genauere Informationen nicht abrufbar sind;

(b) Die Anzahl der Nutzungen pro Tag kann anhand von öffentlich zugänglichen Durchschnittswerten geschätzt werden;

(c) Anzahl der Tage" steht für die Anzahl der Betriebstage des berichtenden Unternehmens in einem Jahr;

(d) Belegung" steht für die Anzahl der ***Beschäftigten*** des Unternehmens, die das Büro nutzen; sie wird häufig als Vollzeitäquivalent (VZÄ) berechnet; und

(e) Das Zeichen∑ weist darauf hin, dass die Berechnungen für jede einzelne Vorrichtung zu addieren sind, um die Gesamtwasserentnahme des meldenden Unternehmens in einer Bürogemeinschaft zu erhalten.

148. Eine weitere mögliche Quelle für die Berichterstattung über den ***Wasserverbrauch*** von Unternehmen, die in Gemeinschaftsbüros arbeiten, ist der GFS-Indikator 3.1: Use stage water consumption user manual" sowie weitere damit zusammenhängende Dokumente und Berechnungsblätter (siehe PG Section Documents | Product Bureau (europa.eu)). Darüber hinaus könnte das Unternehmen das EMAS-Referenzdokument für die öffentliche Verwaltung und das EMAS-Referenzdokument für das Baugewerbe sowie Bewertungssysteme wie das National Australian Built Environment Rating System (NABERS) und Zertifizierungen wie die Building Research Establishment Environmental Assessment Method (BREEM), das Leadership in Energy and Environmental Design (LEED) und das System der Deutschen Gesellschaft für Nachhaltiges Bauen (DGNB) für genutzte Gebäude konsultieren, die in ihren Methoden nützliche Hinweise zur weiteren Verfeinerung der Berechnung des Wasserverbrauchs in Büros und gemeinsam genutzten Räumen liefern könnten.

149. Die Beispiele für die Beschaffung von Wasserentnahmedaten im Falle von Bürogemeinschaften können auf Unternehmen in anderen Sektoren übertragen und von diesen angewandt werden, wobei gegebenenfalls Anpassungen an die sektor- und unternehmensspezifische Situation des Unternehmens erforderlich sind. Die sektoralen EMAS-Referenzdokumente (SRDs) können für sektorspezifische Methoden und Indikatoren zur Wasserentnahme sowie für Industriestandards und Benchmarks herangezogen werden.

150. ***Der Wasserverbrauch*** ist die Menge an Wasser, die innerhalb der Unternehmensgrenzen entnommen wird und nicht in die Gewässer oder an Dritte abgeleitet wird oder abgeleitet werden soll. Dabei handelt es sich in der Regel um verdunstetes Wasser - z. B. bei thermischen Energieprozessen wie Trocknung oder Stromerzeugung -, in Produkte eingebettetes Wasser - z. B. bei der Lebensmittelherstellung - oder Wasser für Bewässerungszwecke - z. B. in der Landwirtschaft oder zur Bewässerung des Betriebsgeländes.

151. Unter Wasserabgabe versteht man z. B. die Wassermenge, die direkt an aufnehmende Gewässer wie Seen oder Flüsse, die öffentliche Kanalisation oder an andere Unternehmen zur kaskadischen Wassernutzung abgegeben wird. Sie kann als die Wasserabgabe des Unternehmens angesehen werden.

152. ***Der Wasserverbrauch*** kann daher wie folgt berechnet werden:

Wasserverbrauch= Wasser-Inputs - Wasser-Outputs oder

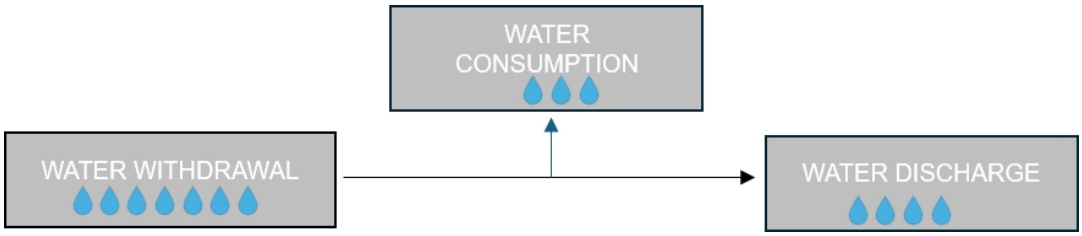
mit anderen Worten:

Wasserverbrauch= (Wasserentnahme) - Wassereinleitungen.

Bei Unternehmen, die ausschließlich Wasser aus dem öffentlichen Wassernetz entnehmen und in die Kanalisation einleiten, geht der Wasserverbrauch gegen Null und kann daher in dem Bericht weggelassen werden.

Ganz allgemein bezieht sich die Anwendbarkeit der Offenlegungspflicht für den Wasserverbrauch auf Informationen, die bereits gesetzlich vorgeschrieben sind, bereits gemeldet wurden und/oder für den Sektor geeignet sind.

153. Eine schematische Darstellung des Verhältnisses zwischen ***Wasserentnahme***, ***Wasserverbrauch*** und Wassereinleitung ist in der folgenden Abbildung zu sehen.



154. Das Unternehmen kann zusätzliche Informationen vorlegen, um seine Wasserentnahme oder seinen Wasserverbrauch zu erläutern. So kann das Unternehmen beispielsweise angeben, ob Regenwasser aufgefangen und als Ersatz für Leitungswasser verwendet wird oder ob Wasser an andere Parteien zur Kaskadennutzung abgeleitet wird.

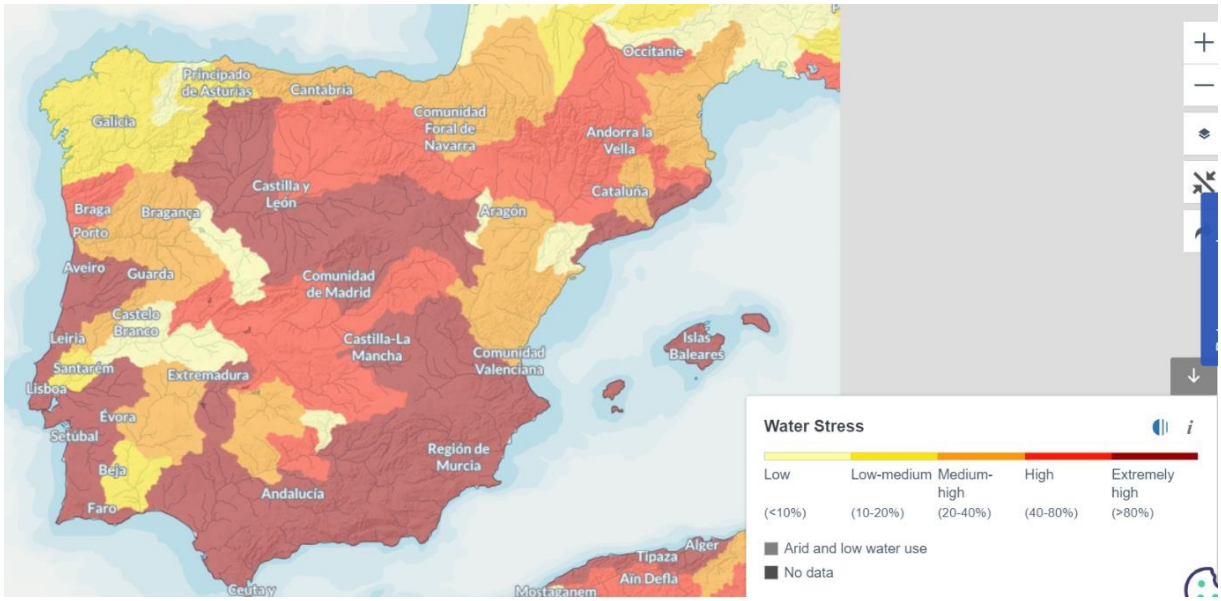
155. Nachstehend finden Sie ein Beispiel dafür, wie Unternehmen quantitative Informationen über ihre Wasserentnahmen, -einleitungen und ihren Wasserverbrauch nach ***Standorten*** aufschlüsseln können.

	Wasserentnahme z.B. m³	**Wasserverbrauch** z.B. m³ (falls zutreffend)
Alle Standorte		
Standorte in Gebieten mit Wasserstress		

*Leitlinien zur Feststellung, ob das Unternehmen **in einem Hochwassergebiet tätig ist***

156. Das Unternehmen kann die lokalen (z. B. nationalen oder regionalen) Wasserbehörden des Ortes/der Orte, an dem/denen es tätig ist, konsultieren, um seine Bewertung der Wasserressourcen für den/die spezifischen Ort(e), einschließlich der Ermittlung von Gebieten mit hohem Wasserstress, zu informieren. Das Unternehmen kann auch auf öffentlich zugängliche und kostenlose Instrumente zurückgreifen, die die Wasserknappheit auf globaler Ebene darstellen. Ein solches Instrument ist der Aqueduct Water Risk der WRIAtlas , der eine interaktive Karte eines Wasserstress-Indikators (der "Basis-Wasserstress", der das Verhältnis des gesamten Wasserbedarfs zu den verfügbaren erneuerbaren Oberflächen- und Grundwasservorräten misst) auf der Ebene von Teileinzugsgebieten bereitstellt. Mit Hilfe dieses Instruments können die Unternehmen den Ausgangswert der Wasserbelastung für verschiedene Flusseinzugsgebiete weltweit einsehen. Werte des Basisindikators für Wasserstress über 40 % weisen auf ein Gebiet mit hohem Wasserstress hin.

157. Zur Veranschaulichung zeigt die nachstehende Karte die wichtigsten iberischen Flusseinzugsgebiete und ihre Wasserstress-Klassifizierung nach dem WRI Aqueduct.



Auf diesem Bild sind mehrere Wassereinzugsgebiete auf der Iberischen Halbinsel zusammen mit ihrer Wasserstressklassifizierung zu sehen. Der größte Teil des südlichen Teils der Halbinsel liegt in einem Gebiet mit hohem Wasserstress - mit Ausnahme des Guadiana-Beckens (in gelb). Wenn das Unternehmen also im Einzugsgebiet des Guadalquivir tätig ist (z. B. in der Region Andalusien, die ein hohes Wasserstressniveau aufweist), müsste das Unternehmen seinen ***Wasserverbrauch*** für diese Region/dieses Einzugsgebiet aufschlüsseln. Findet die Tätigkeit des Unternehmens jedoch im südlichen Teil des Einzugsgebiets des Guadiana statt (wo der Wasserstress gering ist), wäre eine Aufschlüsselung des Wasserverbrauchs für diese Region/dieses Einzugsgebiet nicht erforderlich.

158. Andere mögliche Instrumente, die Unternehmen zur Bestimmung ihres Standorts in wasserbelasteten Gebieten heranziehen können, sind die statische Karte (und der zugehörige Datensatz) der Europäischen Umweltagentur (EUA) Water Exploitation Index plus (WEI+) für Sommer und Urban Morphological Zones (UMZ) und die interaktive Karte Water exploitation index plus (WEI+) für Flussgebietseinheiten (1990-2015), die beide den Wasserstress-Indikator WEI+ zeigen, der den ***Gesamtwasserverbrauch*** als Prozentsatz der erneuerbaren Süßwasserressourcen auf der Ebene Teileinzugsgebiete misst. WEI+-Werte von 40 % oder mehr deuten im Allgemeinen auf eine Situation mit hohem Wasserstress hin. Es ist hervorzuheben, dass WRI Aqueduct seinen Basisindikator für Wasserstress auf die Wassernachfrage stützt, während der EUA-Indikator für Wasserstress WEI+ auf dem Wasserverbrauch basiert.

Quellen für die Dokumentation:

Daten				*Dokumentation Quelle*
Wasser (Messung)	Entnahme	in	gemeinsam genutzt Büros	Wassernutzung in Ihrem Unternehmen", South Staff Water
Wasser (Messung, Schätzung)	Entnahme	in	gemeinsam genutzt Büros	Pegelanzeige(n) 3.1: für die Verwendungsstufe Benutzerhandbuch Wasserverbrauch: Einleitendes Briefing, Anweisungen und Leitlinien (Publikationsversion 1.1), GFS
Wasserentnahme (allgemein)				EMAS-Benutzerhandbuch
Wasserentnahme in KMU				EMAS "einfach" für kleine und mittlere Unternehmen
Wasserstress - WRI Aqueduct				Technisch Hinweis - Aquädukt 4.0: Aktualisiert entscheidungsrelevante globale Wasserrisikoindikatoren, WRI

Wasserstress - WEI+	Zustand der Wasserknappheit in Europa (Wassernutzungsindex plus) | Europäischen Homepage der Umweltagentur (europa.eu)

B7 - Ressourcennutzung, Kreislaufwirtschaft und Abfallmanagement

Leitfaden für die Grundsätze der Kreislaufwirtschaft

159. Bei der Offenlegung von Informationen über seine Produkte, die Verwendung von Materialien und die Abfallbewirtschaftung kann das Unternehmen Informationen in Bezug auf die ***Grundsätze der Kreislaufwirtschaft*** bereitstellen. Die Grundsätze der Kreislaufwirtschaft werden in den folgenden Abschnitten dargelegt. Die von der Ellen Macarthur Foundation dargelegten Schlüsselprinzipien sind unterstrichen, während die von der Europäischen Kommission berücksichtigten Schlüsselprinzipien *kursiv gedruckt* sind.

    Vermeidung von Abfällen und Umweltverschmutzung - dies kann durch Prozessverbesserungen und auch durch Designüberlegungen auf der Ebene der *Verwendbarkeit, Wiederverwendbarkeit, Reparierbarkeit, Demontage* und *Wiederaufarbeitung* geschehen.

    Kreislaufführung von Produkten und Materialien (mit ihrem höchsten Wert) - *Wiederverwendbarkeit* und ***Recycling*** sind der Schlüssel für die Kreislaufführung von Produkten, aber dies wird noch verbessert, wenn in der Entwurfsphase Fragen wie Nutzbarkeit, Wiederverwendbarkeit, Reparierbarkeit, Wiederaufarbeitung und Demontage besonders berücksichtigt werden. Auch Faktoren wie die Einbeziehung von Biomaterialien und deren *Rückführung in den biologischen Kreislauf* können in Betracht gezogen werden, z. B. die Verwendung biologisch abbaubarer Pflanzendecken anstelle von Kunststoffen in der Landwirtschaft.

    Regenerierung der Natur - wann immer möglich, sollten menschliche Aktivitäten darauf abzielen, die Natur zu regenerieren und wichtige ökologische Funktionen zu verbessern oder wiederherzustellen (z. B. Entwässerung, Bereitstellung von Lebensräumen, Wärmeregulierung usw.), die durch frühere menschliche Aktivitäten verloren gegangen sind.

Leitlinien für das gesamte Abfallaufkommen und für Abfälle, die dem Recycling oder der Wiederverwendung zugeführt werden

160. Unternehmen, die nur Haushaltsabfälle erzeugen, können von den Anforderungen in Nummer 38 absehen. In diesem Fall gibt das Unternehmen nur an, dass es diese Art von Abfällen erzeugt.

161. Bei der Berichterstattung über ***gefährliche Abfälle*** gemäß Paragraph 38(a) erfüllt das Unternehmen die Anforderungen an ***radioaktive Abfälle*** des Indikators Nummer 9 aus Tabelle 1 von Anhang 1 der Verordnung über die Offenlegung von Informationen über nachhaltige Finanzierungen (SFDR)[10]. Dieser SFDR-Indikator (Verhältnis zwischen Tonnen radioaktiver und ***gefährlicher Abfälle***) kann unter Verwendung des Zählers und des Nenners berechnet werden, die das Unternehmen bei der Berichterstattung gemäß Paragraph 38(a) angibt.

162. KMU müssen gefährliche und ***radioaktive Abfälle*** offenlegen, wenn bei ihren Tätigkeiten solche Abfälle anfallen. Die Anwendbarkeit hängt vom Vorhandensein gefährlicher oder radioaktiver Stoffe in den Geschäftsprozessen ab.

163. Den Unternehmen wird empfohlen, ihre ***gefährlichen Abfälle*** anhand des Europäischen Abfallkatalogs (EAK) , zu klassifizierenin dem die Abfälle nach Arten eingeteilt sind. Alle Abfälle, die mit einem Sternchen (*) gekennzeichnet sind, werden im EAK als gefährlich eingestuft, normalerweise mit dem Hinweis "enthält gefährliche Stoffe". Zum Beispiel:

    (a) Medizinischer Bereich: kontaminierte scharfe Gegenstände wie Nadeln und Spritzen, die in medizinischen Einrichtungen verwendet werden ("Abfälle, deren Sammlung und Beseitigung besonderen Anforderungen zur Verhinderung von Infektionen unterliegen", EAK-Code 18 01 03*), zytotoxische und zytostatische Arzneimittel (EAK-Code 18 01 08*), verbrauchte Radiopharmaka und bestimmte Diagnosegeräte, die radioaktive Stoffe enthalten;

    (b) Verarbeitendes Gewerbe: gebrauchte Schmierstoffe und Öle, die als gefährlich eingestuft sind (EBR-Code 13 02 05*);

[10] Verordnung (EU) 2019/2088 des Europäischen Parlaments und des Rates vom 27. November 2019 über die Offenlegung von Informationen zur Nachhaltigkeit im Finanzdienstleistungssektor (Verordnung über die Offenlegung von Informationen zur nachhaltigen Finanzierung) (ABl. L 317 vom 9.12.2019, S. 1).

(c) Baugewerbe: asbesthaltige Materialien (EBR-Code 17 09 03*), Böden und Steine, die gefährliche Stoffe enthalten (EBR-Code 17 05 03*), und

(d) Batterien und Akkumulatoren: Bleibatterien (16 06 01*), Ni-Cd-Batterien (16 06 02*), quecksilberhaltige Batterien (16 06 03*).

164. Dennoch gilt ein Abfall als gefährlich, wenn er eine oder mehrere der in Anhang II der Abfallrahmenrichtlinie aufgeführten gefährlichen Eigenschaften aufweist. Zur leichteren Orientierung werden diese im Folgenden zusammen mit den entsprechenden Piktogrammen dargestellt, um die Identifizierung gefährlicher Eigenschaften wie Entflammbarkeit, Toxizität und Ätzwirkung zu erleichtern, die dazu führen können, dass ein Abfall als gefährlich eingestuft wird.

165. Auch ***radioaktive Abfälle*** haben oder können gefährliche Eigenschaften haben, die sie gefährlich machen, nämlich krebserregend, erbgutverändernd oder fortpflanzungsgefährdend. Dennoch unterliegen radioaktive Stoffe innerhalb der [EU11]. gesonderten RegelungenUnternehmen, die radioaktive Stoffe verwenden und dabei radioaktive Abfälle erzeugen können, die den EU-Vorschriften unterliegen, sollten sich dessen bewusst sein. Radioaktive Abfälle sollten anhand des Vorhandenseins von Radionukliden oberhalb der behördlichen Freigabeschwellen identifiziert werden.

166. ***Radioaktive Abfälle*** können in einer Vielzahl von Gegenständen enthalten sein, z. B. in medizinischen, Forschungs- und Industriegeräten, Rauchmeldern oder Schlämmen.

167. Im Folgenden werden Gefahrenpiktogramme für jede Gefahrenklasse dargestellt.

Gefährdungspiktogramm	**Piktogramm-Anweisung, Symbol und Klasse**	**Was bedeutet das?**
	**'Gas unter Druck'** *Symbol: Gasflasche* Physikalische Gefährdung	• Enthält Gas unter Druck; kann bei Erwärmung explodieren • Enthält tiefgekühltes Gas; kann kryogene Verbrennungen oder Verletzungen verursachen
	**Explosiv** *Symbol: Explodierende Bombe* Physikalische Gefährdung	• Instabiler Sprengstoff • Explosionsgefährlich; Gefahr der Massenexplosion • Explosiv; schwere Projektionsgefahr • Explosionsgefährlich; Brand-, Explosions- oder **Schleudergefahr** • Masse kann im Feuer explodieren
	**Oxidierend** *Symbol: Flamme über Kreis* Physikalische Gefährdung	• Kann Brand verursachen oder verstärken; Oxidationsmittel. • Kann Brand oder Explosion verursachen; starkes Oxidationsmittel.

[11] Richtlinie der EU über die Entsorgung radioaktiver Abfälle und abgebrannter Brennelemente (2011/70/Euratom). Weitere Informationen finden Sie auf der EU-Webseite über radioaktive Abfälle und abgebrannte Brennelemente.

	**Entflammbar** *Symbol: Flamme* Physikalische Gefährdung	• **Hochentzündliches Gas** • Entflammbares Gas • Hochentzündliches Aerosol • Entflammbares Aerosol • Leicht entzündliche Flüssigkeit und Dämpfe • Entzündbare Flüssigkeiten und Dämpfe • Entflammbarer Feststoff
	**Ätzend** *Symbol: Korrosion* Physikalische Gefährdung / Gesundheitsgefährdung	• Kann korrosiv auf Metalle wirken • Verursacht schwere Hautverbrennungen und Augenschäden
	**Gesundheitsgefahr/Gefährdung der Ozonschicht".** *Symbol: Ausrufezeichen* Gesundheitsgefährdung	• Kann die Atemwege reizen • Kann Schläfrigkeit oder Benommenheit verursachen • Kann eine **allergische Hautreaktion** hervorrufen • Verursacht schwere **Augenreizungen** • Verursacht Hautreizungen • Gesundheitsschädlich beim Verschlucken • Schädlich bei Berührung mit der Haut • Gesundheitsschädlich beim Einatmen • Schädigt die öffentliche Gesundheit und die Umwelt durch Zerstörung des Ozons in der oberen Atmosphäre
	**Akute Toxizität".** *Symbol: Totenköpfe und gekreuzte Knochen* Gesundheitsgefährdung	• Tödlich bei Verschlucken • Tödlich bei Berührung mit der Haut • Tödlich bei Einatmen • Giftig: bei Verschlucken • Giftig bei Berührung mit der Haut • Giftig beim Einatmen

	**Ernsthafte Gesundheitsgefahr".** *Symbol: Gesundheitsgefährdung* Gesundheitsgefährdung	• Kann bei Verschlucken und **Eindringen in die Atemwege** tödlich sein • Verursacht **Schäden an den Organen** • Kann zu Organschäden führen • Kann die Fruchtbarkeit oder das ungeborene Kind schädigen • Verdacht auf Schädigung der Fruchtbarkeit oder des ungeborenen Kindes • Kann Krebs verursachen • Steht im Verdacht, Krebs zu verursachen • Kann **genetische Defekte** verursachen • Steht im Verdacht, **genetische Defekte zu verursachen** • Kann bei Einatmung Allergie- oder Asthmasymptome oder Atembeschwerden verursachen
	**Gefährlich für die Umwelt** *Symbol: Umwelt* Umweltgefährdung	• Sehr giftig für Wasserorganismen mit lang anhaltender **Wirkung** • Giftig für Wasserorganismen mit langfristiger Wirkung

Piktogramme, die auf gefährliche Eigenschaften hinweisen, Anhang V, der Verordnung (EG) Nr. 1272/2008 über die Einstufung, Kennzeichnung und Verpackung (CLP).

168. Bei der Vorlage von Informationen über das Abfallaufkommen oder die Abfallvermeidung sollte das Unternehmen diese Informationen vorzugsweise in Gewichtseinheiten (z. B. kg oder Tonnen) angeben. Sollte das Unternehmen jedoch die Gewichtseinheiten für ungeeignet halten, kann es stattdessen die oben genannten Messgrößen in Volumeneinheiten (z. B. m3) angeben.

169. Bei der Offenlegung von Informationen über die jährlichen Gesamtabfälle, die dem ***Recycling*** oder der Wiederverwendung zugeführt werden, sollte das Unternehmen die Abfälle berücksichtigen, die sortiert und an Recycling- oder Wiederverwendungsbetriebe weitergeleitet werden (z. B. die Menge der in Recyclingbehälter gefüllten Abfälle oder die Sortierung der Abfälle in bestimmte Materialkategorien und deren Abgabe an Abfallbehandlungsanlagen), und nicht die Abfälle, die tatsächlich recycelt oder wiederverwendet werden.

170. Bei der Offenlegung von Informationen über Abfälle kann das Unternehmen die folgenden Tabellen verwenden.

	Erzeugte Abfälle (z. B. Tonnen)		
	Gesamtes Abfallaufkommen, :		
		Abfälle, die dem Recycling oder der Wiederverwendung zugeführt werden	*Der Entsorgung zugeführte Abfälle*

Ungefährlicher Abfall			
Art des Abfalls1			
Art des Abfalls2			
...			
Gefährliche Abfälle			
Art des Abfalls1			
...			

171. Beispiele für ***gefährliche* Abfälle**, die in kleinen Unternehmen anfallen können, sind Batterien, Altöl, Pestizide, quecksilberhaltige Geräte und Leuchtstofflampen.

172. Das Unternehmen kann weitere Untergliederungen vorlegen, die weitere Arten von nicht gefährlichen und ***gefährlichen Abfällen*** spezifizieren. Dabei kann es die Liste der Abfallbeschreibungen berücksichtigen, die in den sozialen Metriken des Europäischen Abfallkatalogs enthalten sind.

Leitlinien für den jährlichen Massenstrom der verwendeten Materialien

173. Der jährliche Massenstrom ist ein Indikator, der mit den EMAS-Anforderungen an die Effizienz des Materialverbrauchs übereinstimmt und die Abhängigkeit eines Unternehmens von bestimmten Materialien in seiner Tätigkeit veranschaulicht (z. B. Holz und Stahl für die Bauindustrie). Das Unternehmen muss Angaben zu den von ihm verwendeten Materialien machen, und zwar sowohl zu den Materialien, die es von Lieferanten bezieht, als auch zu den Materialien, die es selbst in der Produktion einsetzt. Um den jährlichen Massenstrom der von ihm Materialien zu berechnen, muss das Unternehmen zunächst die spezifischen Schlüsselmaterialien ermitteln, von denen seine Tätigkeiten abhängig sind und für die die Materialeffizienz bewertet werden muss (z. B. Materialeffizienz von Holz). Werden verschiedene Arten von Materialien verwendet, das Unternehmen den jährlichen Massenstrom (d. h. das Gesamtgewicht für jedes verwendete Material, z. B. die eingekauften Tonnen Holz) für jedes wichtige Material in geeigneter Weise angeben, z. B. aufgeschlüsselt nach der Verwendung, für die es eingesetzt wird (EMAS, 2023). Der Massenstrom relevanter eingesetzter Materialien ergibt sich aus der Summe des Gewichts aller verwendeten Materialien, einschließlich , Hilfsstoffen, Einsatzstoffen, Halbfertigprodukten oder anderen (ohne Energiequellen und Wasser) und liefert das Gesamtgewicht für jedes relevante eingesetzte Material (z. B. Tonnen eingekauftes Holz). Der Massenstrom der eingesetzten relevanten Materialien ergibt sich aus der Summe des Gewichts aller eingesetzten Materialien, einschließlich , Hilfsstoffen, Einsatzstoffen, Halbfertigprodukten oder anderen (ohne Energiequellen und Wasser) Dieser Indikator ist vorzugsweise in Gewichtseinheiten (z. B. Kilogramm oder Tonnen), Volumeneinheiten (z. B. m³) oder anderen in der Branche gebräuchlichen metrischen Einheiten anzugeben.

Anleitung zur Identifizierung von Herstellungs-, Konstruktions- und/oder Verpackungsprozessen

174. Zur Identifizierung von Herstellungs-, Bau- und/oder Verpackungsprozessen kann das Unternehmen auf die Tätigkeiten verweisen, die unter Abschnitt C - Herstellung, Abschnitt F - Bau sowie die Klasse N82.92 "Verpackungstätigkeiten" von Anhang I der Verordnung (EG) Nr. 1893/2006[12] fallen.

Basismodul Leitfaden - Soziale Metriken B8 -

Arbeitskräfte - Allgemeine Merkmale

175. Das Vollzeitäquivalent (VZÄ) ist die Anzahl der Vollzeitstellen in einem Unternehmen. Es kann berechnet werden, indem die geplanten Arbeitsstunden eines ***Arbeitnehmers*** (die gesamte effektiv geleistete Arbeitszeit in einer Woche) durch die Stunden des Arbeitgebers für eine Vollzeitarbeitswoche (die gesamte Arbeitszeit der Vollzeitbeschäftigten) geteilt wird. Ein Arbeitnehmer, der zum Beispiel 25 Stunden pro Woche für ein Unternehmen arbeitet, in dem die Vollzeitwoche 40 Stunden beträgt, entspricht einem VZÄ von 0,625 (d. h. 25/40 Stunden).

[12] L_2006393DE.01000101.xml (europa.eu).

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176. Der Personalbestand ist die Gesamtzahl der Beschäftigten des Unternehmens zu einem bestimmten Zeitpunkt.

Anleitung zur Darstellung von Informationen über die Vertragsarten der Mitarbeiter

177. Die folgende Tabelle zeigt, wie Informationen über ***Arbeitnehmer*** nach Art des Arbeitsvertrags dargestellt werden können.

Art des Vertrags	**Zahl der Beschäftigten (Kopfzahl oder Vollzeitäquivalente)**
Befristeter Vertrag	
Unbefristeter Vertrag	
Mitarbeiter insgesamt	

178. Die folgende Tabelle zeigt, wie die Informationen über die ***Beschäftigten*** nach Geschlecht aufgeschlüsselt werden können.

Geschlecht	**Zahl der Beschäftigten (Kopfzahl oder Vollzeitäquivalente)**
Männlich	
Weiblich	
Andere	
Nicht berichtet	
Mitarbeiter insgesamt	

179. In einigen Mitgliedstaaten der Europäischen Union ist es möglich, sich rechtlich Person mit einem dritten, oft neutralen Geschlecht eintragen zu lassen, das in der obigen Tabelle als "Sonstiges" zu kategorisieren ist. Wenn das Unternehmen Daten über ***Arbeitnehmer*** offenlegt, bei denen dies nicht möglich ist, kann es dies erläutern und angeben, dass die Kategorie "andere" nicht anwendbar ist. Die Kategorie "nicht angegeben" gilt für Mitarbeiter, die ihre Geschlechtsidentität nicht offenlegen.

180. Die folgende Tabelle zeigt, wie die Informationen über die ***Beschäftigten*** nach Ländern dargestellt werden können.

Land (der Beschäftigung) Vertrag)	**Zahl der Beschäftigten (Kopfzahl oder Vollzeitäquivalente)**
Land A	
Land B	
Land C	
Land D	
Mitarbeiter insgesamt	

181. Definitionen und Arten von Arbeitsverträgen können je nach Land variieren. Hat das Unternehmen ***Arbeitnehmer***, die in mehr als einem Land arbeiten, so verwendet es zur Berechnung der Daten auf Länderebene die rechtlichen Definitionen, die in den nationalen Gesetzen der Länder, in denen die Arbeitnehmer tätig sind, festgelegt sind. Diese länderspezifischen Daten werden dann addiert, um die Gesamtzahl zu berechnen, wobei die Unterschiede in den nationalen rechtlichen Definitionen unberücksichtigt bleiben.

182. Die Fluktuation bezieht sich auf Arbeitnehmer, die das Unternehmen freiwillig oder aufgrund von Entlassung, Ruhestand oder Tod im Dienst verlassen.

183. Zur Berechnung der Umschlagshäufigkeit ist die nachstehende Formel zu verwenden.

$$\frac{Numberofemployeesleftduringreporting\ year}{Averagenumberofemployeesduringreportingyear} \ x\ 100$$

B9 - Arbeitskräfte - Gesundheit und Sicherheit

Leitlinien zur Quote der meldepflichtigen Arbeitsunfälle

184. Ausgehend von der Annahme, dass ein Vollzeitbeschäftigter 2.000 Stunden pro Jahr arbeitet, gibt die Quote die Zahl der Arbeitsunfälle pro 100 Vollzeitbeschäftigte in einem Jahreszeitraum an. Kann das Unternehmen die Zahl der geleisteten Arbeitsstunden nicht direkt berechnen, so kann es diese auf der Grundlage der normalen oder Standardarbeitszeit schätzen.

185. Zur Berechnung der Quote der ***meldepflichtigen*** Arbeitsunfälle von ***Arbeitnehmern*** sollte die nachstehende Formel verwendet werden.

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$$\frac{Numberofworkrelatedaccidentsinreportingyear}{Totalnumberofworkedinayearbyallemployees} \; x \; 200{,}000$$

Beispiel

186. Unternehmen A meldete im Berichtsjahr drei Arbeitsunfälle. Unternehmen A hat 40 ***Mitarbeiter*** und eine Gesamtzahl von 80.000 Arbeitsstunden (40 x 2.000) in einem Jahr.

Die Quote der ***meldepflichtigen*** Arbeitsunfälle beträgt 3/80.000 x 200.000= 7,5.

Leitlinien zur Zahl der Todesfälle infolge von arbeitsbedingten Verletzungen und arbeitsbedingten Erkrankungen

187. Arbeitsbedingte Verletzungen und arbeitsbedingte Erkrankungen entstehen, wenn man bei der Arbeit Gefahren ausgesetzt ist.

188. Im Falle von Telearbeit gelten Verletzungen und Erkrankungen als arbeitsbedingt, wenn die Verletzung oder Erkrankung direkt mit der Arbeitsleistung und nicht mit der allgemeinen häuslichen Umgebung zusammenhängt.

189. Unfälle und Krankheiten, die sich auf dem Weg zur Arbeit ereignen, gelten als arbeitsbedingt, wenn der ***Arbeitnehmer*** zum Zeitpunkt des Unfalls oder der Krankheit Arbeitstätigkeiten im Interesse des Arbeitgebers verrichtet hat. Unfälle, die sich auf Reisen außerhalb des Verantwortungsbereichs des Unternehmens ereignen (d. h. auf dem regelmäßigen Arbeitsweg), unterliegen den geltenden nationalen Rechtsvorschriften, in denen geregelt ist, ob sie als arbeitsbezogen gelten oder nicht.

190. Psychische Erkrankungen gelten als arbeitsbedingt, wenn sie von dem betreffenden Arbeitnehmer freiwillig gemeldet wurden und wenn ein Gutachten eines zugelassenen Arztes vorliegt, in dem bestätigt wird, dass die betreffende Erkrankung tatsächlich arbeitsbedingt ist, und das ebenfalls gemeldet wurde. Gesundheitsprobleme infolge von Rauchen, Drogen- und Alkoholmissbrauch, körperlicher Inaktivität, ungesunder Ernährung und psychosozialen Faktoren, die nicht mit der Arbeit zusammenhängen, gelten nicht als arbeitsbedingt.

191. Das Unternehmen kann die Todesfälle aufgrund von arbeitsbedingten Verletzungen und die Todesfälle aufgrund von arbeitsbedingten Erkrankungen getrennt darstellen.

B10 - Arbeitskräfte - Entlohnung, Tarifverhandlungen und Ausbildung

Leitlinien zum Arbeitsentgelt: Mindestlohn

192. Der Begriff "***Mindestlohn***" bezieht sich auf das Mindestentgelt für eine Beschäftigung pro Stunde oder einer anderen Zeiteinheit. Je nach Land kann der Mindestlohn direkt per Gesetz oder durch Tarifverträge festgelegt werden. Das Unternehmen bezieht sich auf den geltenden Mindestlohn des Landes, über das es berichtet.

193. Für die niedrigste Lohngruppe, mit Ausnahme von Praktikanten und Auszubildenden, dient der ***Mindestlohn*** als Grundlage für die Berechnung des Einstiegslohns. Daher umfasst der Einstiegslohn das Entgelt in Höhe des Mindestlohns sowie alle zusätzlichen festen Zahlungen, die den ***Arbeitnehmern*** in dieser Kategorie garantiert werden.

Leitlinien zur Entlohnung: Prozentualer Unterschied zwischen weiblichen und männlichen Beschäftigten

194. Die Kennzahl für prozentuale Gefälle zwischen weiblichen und männlichen ***Beschäftigten*** entspricht dem Grundsatz der Gleichstellung der Geschlechter, der gleiches ***Entgelt*** für gleiche Arbeit vorschreibt. Das Lohngefälle ist definiert als der Unterschied zwischen dem durchschnittlichen Lohnniveau von weiblichen und männlichen Beschäftigten, ausgedrückt als Prozentsatz des durchschnittlichen Lohnniveaus männlicher Beschäftigter.

195. Für die Berechnung dieser Kennzahl sind alle ***Beschäftigten*** in die Berechnung einzubeziehen. Darüber hinaus sollten zwei getrennte Berechnungen des ***Durchschnittslohns*** für weibliche und männliche Beschäftigte vorgenommen werden. Siehe die nachstehende Formel:

$$\frac{(Averagegross\ hourly\ paylevelofmaleemployees - averagegrosshourly\ payleveloffemaleemployees)}{Averagegrosspaylevelofmaleemployees} \; x100$$

196. Je nach der Vergütungspolitik des Unternehmens bezieht sich das ***Bruttoentgelt*** auf alle folgenden Elemente:

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(a) Grundgehalt, d.h. die Summe der garantierten, kurzfristigen, nicht variablen Barvergütung;

(b) Geldleistungen, die sich aus der Summe des Grundgehalts und der Barzulagen, Boni, Provisionen, Gewinnbeteiligungen in bar und anderen Formen variabler Barzahlungen zusammensetzen;

(c) Sachleistungen wie Autos, private Krankenversicherungen, Lebensversicherungen und Wellness-Programme; und

(d) Direktvergütung, d. h. die Summe aus Geldleistungen, Sachleistungen und dem gesamten beizulegenden Zeitwert aller jährlichen langfristigen Anreize.

197. Der ***Bruttolohn*** ist die Summe aller oben aufgeführten anwendbaren Bestandteile.

198. Der durchschnittliche ***Bruttostundenlohn*** ist der wöchentliche/jährliche Bruttolohn geteilt durch die durchschnittlich geleisteten Arbeitsstunden pro Woche/Jahr.

Beispiel

199. Unternehmen A hat insgesamt *X* männliche und *Y* weibliche Beschäftigte. Der ***Bruttostundenlohn*** der männlichen Arbeitnehmer beträgt 15 € und der Bruttostundenlohn der weiblichen Arbeitnehmer beträgt 13 €.

200. Das durchschnittliche ***Bruttostundenentgelt*** der männlichen ***Beschäftigten*** ist die Summe aller Bruttostundenentgelte geteilt durch die Gesamtzahl der männlichen Beschäftigten. Das durchschnittliche Bruttostundenentgelt der weiblichen Beschäftigten ist die Summe aller Bruttostundenentgelte geteilt durch die Gesamtzahl der weiblichen Beschäftigten.

201. Die Formel zur Berechnung des prozentualen Lohngefälles zwischen männlichen und weiblichen ***Beschäftigten*** lautet

$$\frac{15 - 13}{15} x\ 100 = 13{,}3\%$$

Leitfaden zur tarifvertraglichen Deckung

202. Die von den Tarifverträgen erfassten ***Arbeitnehmer*** sind die Personen, auf die das Unternehmen verpflichtet ist, den Tarifvertrag anzuwenden. Wenn ein Arbeitnehmer unter mehr als einen Tarifvertrag fällt, muss er nur einmal gezählt werden. Wenn keiner der Arbeitnehmer unter einen Tarifvertrag fällt, ist der Prozentsatz gleich Null.

203. Der Prozentsatz der ***Arbeitnehmer***, die unter Tarifverträge fallen, wird nach folgender Formel berechnet.

$$\frac{Numberofemployeescoveredby\ collectivebargainingagreements}{Numberofemployees}\ x\ 100$$

204. Die in dieser Offenlegungspflicht geforderten Informationen können als Deckungsraten gemeldet werden, wenn die
die ***tarifvertragliche*** Deckung liegt zwischen 0-19%, 20-39%, 40-59%, 60-79% oder 80-100%.

205. Diese Anforderung zielt nicht darauf ab, den prozentualen Anteil der von Betriebsrat vertretenen oder gewerkschaftlich organisierten ***Arbeitnehmer*** zu ermitteln, der unterschiedlich sein kann. Der Prozentsatz der Arbeitnehmer, die unter Tarifverträge fallen, kann höher sein als der Prozentsatz der gewerkschaftlich organisierten Arbeitnehmer, wenn die Tarifverträge sowohl für Gewerkschaftsmitglieder als auch für Nicht-Gewerkschaftsmitglieder gelten.

<u>Basismodul Leitlinien - Metriken zum Geschäftsgebaren</u> B11 -

Verurteilungen und Geldstrafen wegen Korruption und

Bestechung

206. ***Korruption*** und Bestechung fallen unter das Thema Nachhaltigkeit ***im Geschäftsgebaren***.

207. Gemäß Absatz 43 berichtet das Unternehmen über die Gesamtzahl der Verurteilungen und den Gesamtbetrag der Geldstrafen, die wegen Verstößen gegen die Gesetze zur Korruptions- und Bestechungsbekämpfung verhängt wurden.

Hinweise zu Verurteilungen

208. Verurteilungen wegen Verstoßes gegen die Gesetze zur Korruptions- und Bestechungsbekämpfung beziehen sich auf jedes Urteil eines Strafgerichts gegen eine Person oder ein Unternehmen wegen einer Straftat im Zusammenhang mit ***Korruption*** und Bestechung, z. B. wenn diese Gerichtsentscheidungen in das Strafregister des verurteilenden Mitgliedstaats der Europäischen Union eingetragen werden.

Leitlinien für Geldbußen

209. Bußgelder, die wegen Verstößen gegen Korruptions- und Bestechungsgesetze verhängt werden, beziehen sich auf obligatorische Geldstrafen, die von einem Gericht, einer Kommission oder einer anderen staatlichen Behörde verhängt werden und an eine öffentliche Kasse gezahlt werden.

Umfassendes Modul: Beratung

210. Die nachstehenden Leitlinien sind als Teil eines Ökosystems gedacht, das auch die weiterer unterstützender Leitlinien durch die EFRAG, weiterer digitaler Hilfsmittel und Umsetzungshilfen (Bildungsmaßnahmen, Einbeziehung der Interessengruppen usw.) umfasst, um einige der in den Leitlinien enthaltenen technischen Elemente zu erleichtern.

211. Dieser Leitfaden soll die Erstellung von Metriken im umfassenden Modul unterstützen.

Umfassende Anleitung zum Modul - Allgemeine Informationen

C1 - Strategie: Geschäftsmodell und Nachhaltigkeit - Verwandte Initiativen

212. Bei der Beschreibung der wichtigsten ***Verbraucher*** und Lieferantenbeziehungen gemäß Absatz 47 Buchstabe c) gibt das Unternehmen die geschätzte Anzahl der Lieferanten sowie die entsprechenden Sektoren und geografischen Gebiete (d. h. Länder) an.

C2 - Beschreibung von Praktiken, Strategien und künftigen Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

213. Die Unternehmen können die folgende Vorlage für die Berichterstattung über C2-Datenpunkte verwenden.

	Wenn Sie die Frage nach bestehenden Praktiken/Politiken/zukünftigen Initiativen in Offenlegung B2 mit JA beantwortet haben, beschreiben Sie diese bitte kurz zusammen mit den daraus resultierenden Maßnahmen. (Falls sich die Praxis/ Politik/ künftige Initiative auf Lieferanten oder Kunden bezieht, muss das Unternehmen dies erwähnen)	Wenn Sie die Frage nach künftigen Initiativen/Zielen in Angabe B2 mit JA beantwortet haben, geben Sie diese bitte an.	Geben Sie bitte die höchste Führungsebene im Unternehmen an, die für die Umsetzung der Maßnahmen verantwortlich ist [falls vorhanden].
Klimawandel			
Verschmutzung			
Wasser und Meeresressourcen			
Biologische Vielfalt und Ökosysteme			
Kreislaufwirtschaft			
Eigene Arbeitskräfte			
Beschäftigte in der Wertschöpfungskette			
Betroffene Gemeinschaften			

Verbraucher und Endnutzer			
Geschäfts gebaren			

Umfassender Modulleitfaden - Umweltmetriken

Berücksichtigung bei der Berichterstattung über Treibhausgasemissionen unter B3 (Basismodul)

214. Bei der Entscheidung, ob die Offenlegung von Scope 3 nach Absatz 50 angemessen ist, kann das Unternehmen seine gesamten Scope-3-THG-Emissionen auf der Grundlage der 15 Scope-3-Kategorien des GHG-Protokolls unter Verwendung geeigneter Schätzungen überprüfen und unter Einbeziehung dieser Informationen durch Verweis berichten. Dies ermöglicht die Identifizierung und Offenlegung seiner wesentlichen Scope-3-Kategorien auf der Grundlage des Umfangs ihrer geschätzten THG-Emissionen und anderer Kriterien, die im GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, S. 61 und 65-68) oder in EN ISO 14064-1:2018 Anhang H.3.2 aufgeführt sind, wie z. B. finanzielle Ausgaben, Einfluss, damit verbundene Übergangsrisiken und -chancen oder Ansichten der Interessengruppen.

215. KMU, die in den Bereichen Fertigung, Agrar- und Ernährungswirtschaft, Immobilienbau und Verpackung tätig sind, haben wahrscheinlich bedeutende Scope-3-Kategorien (CDP, 2024), die für die Berichterstattung in der Branche des Unternehmens als relevant angesehen werden können.

C3 - Treibhausgasreduzierung und Klimawandel

216. Emissionsreduzierungen können für ein Unternehmen sowohl eine Herausforderung als auch eine Chance darstellen, da sie häufig Änderungen der strategischen und betrieblichen Realität des Unternehmens erfordern. Das Ziel der Emissionssenkung kann eine Überprüfung der strategischen und finanziellen Prioritäten erfordern. Die Dekarbonisierung kann erhebliche Anfangsinvestitionen erfordern, z. B. in die Elektrifizierung des Fuhrparks, die Einführung neuer Technologien zur Senkung des Energieverbrauchs oder die Entwicklung neuer Produktlinien, die weniger kohlenstoffintensive Materialien benötigen. Andererseits kann die Umsetzung kohlenstoffarmer Lösungen zur Verringerung der Treibhausgasemissionen die Kosten für eingekaufte Energie und Materialien erheblich senken. Unternehmen, die sich auf den Weg der Dekarbonisierung begeben, stehen oft vor wichtigen Anpassungen ihrer Geschäftsmodelle oder täglichen Abläufe. So muss ein Logistik- und Lieferunternehmen möglicherweise sein Flottenmanagement umgestalten, um potenzielle Unterbrechungen des Dienstes aufgrund der Notwendigkeit des regelmäßigen Aufladens von Fahrzeugen zu minimieren. Ein Unternehmen der Konsumgüterindustrie, das plant, eine Komponente seines Produkts durch eine nachhaltige, kohlenstoffarme Alternative zu ersetzen, muss möglicherweise Zeit und Ressourcen für Produktinnovationen und die Suche nach neuen Lieferanten aufwenden. Diese Anstrengungen können wiederum zu Kostensenkungen, zum Zugang zu neuen Märkten, zur Schaffung neuer Arbeitsplätze und zur Erschließung zusätzlicher Finanzmittel führen, so dass die Reduzierung der Treibhausgasemissionen nicht nur eine Herausforderung, sondern auch eine strategische Geschäftsmöglichkeit darstellt. In diesem Zusammenhang sind ***Zielvorgaben*** für die Verringerung der Treibhausgasemissionen eine wichtige Maßnahme, um der Notwendigkeit eines nachhaltigen Wandels gerecht zu werden, da sie es den Unternehmen ermöglichen, den Wandel auf systematische, kontrollierte und organisierte Weise zu bewältigen.

217. Ein Ziel für die Verringerung der Treibhausgasemissionen ist eine Verpflichtung, die Treibhausgasemissionen des Unternehmens in einem zukünftigen Jahr im Vergleich zu den in einem ausgewählten Basisjahr gemessenen Treibhausgasemissionen zu verringern. ***Zu den Maßnahmen***, die zu einer Emissionsreduzierung führen können, gehören z. B. Elektrifizierung, Strom aus erneuerbaren Energien, Entwicklung nachhaltiger Produkte usw. Die Offenlegung C3 verlangt, dass das Unternehmen ***Ziele für die*** Verringerung der THG-Emissionen für seine Scope-1- und Scope-2-Emissionen angibt.

218. Die entfernten und vermiedenen Emissionen werden nicht als Verringerung der Brutto-THG-Emissionen des Unternehmens verbucht. Dies liegt an der wichtigen Unterscheidung zwischen der Bilanzierung von Brutto-THG-Emissionen (Bestandsaufnahme) und dem Abbau und der Vermeidung von THG-Emissionen (projektbezogene oder interventionsbezogene Bilanzierung). Die Brutto-THG-Emissionen des Unternehmens dienen dazu, die tatsächlich in Umwelt abgegebenen Emissionen nachzuvollziehen und eine konsistente und vergleichbare Ausgangsbasis für die Festlegung von ***THG-Zielen*** zu schaffen. Die vermiedenen Emissionen und der Kohlenstoffabbau hingegen beziehen sich auf spezifische Projektaktivitäten des Unternehmens, was bedeutet, dass ihre Bilanzierung getrennt von den Brutto-THG-Emissionen erfolgt.

219. Um dieser Praxis zu folgen, muss das Unternehmen zwischen seinen Brutto-THG-Emissionen und anderen ***Auswirkungen*** unterscheiden, die nicht erfasst sind, wie z. B. THG-Abbau und vermiedene Emissionen.

Die Entnahme bezieht sich auf den Entzug von Treibhausgasen aus der Atmosphäre als Ergebnis bewusster menschlicher Aktivitäten. Beispiele für solche Aktivitäten sind das Pflanzenwachstum (Übertragung von atmosphärischem CO_2 durch Photosynthese) und die direkte Abscheidung von CO_2 aus der Luft, die in der Regel mit der anschließenden Speicherung von CO_2 verbunden ist. Als vermiedene Treibhausgasemissionen werden in der Regel Emissionen bezeichnet, die andernfalls entstanden wären aber aufgrund der Aktivitäten des Unternehmens nicht entstanden sind. Dazu kann die Einführung neuer Produkte und Technologien gehören, die die Nachfrage nach ihren kohlenstoffintensiven Äquivalenten verringern, z. B. Isolierungslösungen in einem Gebäude, die die Nachfrage nach Energiedienstleistungen in diesem Gebäude vermeiden. Weitere Informationen zu den Konzepten des Kohlenstoffabbaus und der vermiedenen Emissionen finden sich in der GHG Protocol Land Sector and Removals [Guidance13] sowie in der WBCSD [Guidance14].

220. Ein Basisjahr ist ein vorangegangenes Jahr, anhand dessen die aktuellen Treibhausgasemissionen des Unternehmens gemessen werden können. Im Allgemeinen sollte das Basisjahr ein aktuelles und repräsentatives Jahr der THG-Emissionen des Unternehmens sein, für das nachprüfbare Daten vorliegen.

221. Das Zieljahr ist das Jahr in der Zukunft, in dem das Unternehmen eine bestimmte absolute oder prozentuale Menge an THG-Emissionsreduktionen erreichen will. Es sollte sich über einen Zeitraum von ein bis drei Jahren vom Basisjahr bis zu einem kurzfristigen Ziel erstrecken. Es können auch längerfristige ***Ziele*** angegeben werden, zum Beispiel für Zeiträume von zwanzig oder dreißig Jahren (z. B. 2040 oder 2050). Die Unternehmen werden ermutigtZielwerte mindestens für das kurzfristige Zieljahr 2030 und, falls möglich, für das langfristige Zieljahr 2050 anzugeben. Ab 2030 wird empfohlen, das Basisjahr und das Zieljahr für die THG-Emissionsreduktionsziele nach jedem Fünfjahreszeitraum zu aktualisieren.

222. Bei der Festlegung eines Ziels sollten die Unternehmen die vorhandenen wissenschaftlichen Erkenntnisse zur Verringerung der Treibhausgasemissionen berücksichtigen. Das SBTi empfiehlt ein sektorübergreifendes Ziel für die Reduzierung der THG-Emissionen von -42 % bis zum Jahr 2030 und -90 % bis zum Jahr 2050 (Basisjahr 2020). Das Stockholm Resilience Centre schlägt außerdem ein "Kohlenstoffgesetz" vor, in dem konkrete Schritte zur vollständigen Dekarbonisierung bis 2050 festgelegt werden, die auf einer flexiblen Denkweise zur Reduzierung der Kohlenstoffemissionen beruhen, indem die Emissionen in jedem Jahrzehnt halbiert und der Ausbau der ***erneuerbaren Energien*** exponentiell gesteigert werden. Die Autoren argumentieren, dass dieser Fahrplan eine 75-prozentige Chance bieten würde, die Erde unter 2°C über den vorindustriellen Temperaturen zu halten - dem im Pariser Abkommen festgelegten [Ziel15]. SBTi schlägt auch einen gestrafften Zielsetzungsweg für kleine und mittlere Unternehmen [vor16]. Auch für die einzelnen Sektoren gibt es spezifische Pfade, die von den Unternehmen bei der Festlegung ihrer ***Ziele für*** die Verringerung der Treibhausgasemissionen berücksichtigt werden können.

223. Um eine schnelle Verringerung der direkten und indirekten Emissionen zu erreichen, kann das Unternehmen einige einfache ***Maßnahmen*** ergreifen. Einige Maßnahmen können einfach sein, aber dennoch zu einer nennenswerten Emissionsreduzierung führen und das Unternehmen dabei unterstützen, seine ***Ziele zu erreichen***. So führt beispielsweise die Elektrifizierung des Fuhrparks durch den Ersatz von Fahrzeugen, die mit fossilen Brennstoffen betrieben werden, durch Elektrofahrzeuge zu einer Emissionsreduzierung, sobald der bisherige Fuhrpark ersetzt wird. Dies kann insbesondere für ein Unternehmen, das auf den Transport angewiesen ist, eine erhebliche Emissionsreduzierung bedeuten. Auch das Ersetzen von Pendler- und Geschäftsreisen mit dem Auto durch kohlenstoffarme Alternativen wie Fahrräder oder öffentliche Verkehrsmittel ist eine wirksame, einfache und realisierbare Dekarbonisierungsmaßnahme. Ein weiterer Ansatzpunkt ist die Überprüfung des internen Energiemanagements, die Umstellung auf energieeffiziente Geräte und die Integration von Wartungsarbeiten in den laufenden . Durch die regelmäßige Wartung von Geräten und Maschinen und deren Ersatz durch energieeffizientere Alternativen, wann und wo immer dies möglich ist, kann das Unternehmen seinen senken. Zu diesen Geräten gehören zum Beispiel Heizkessel, Telekommunikationssysteme, Wärmepumpen, Klimaanlagen usw. Durch regelmäßige Wartung kann ihr effizienter Betrieb sichergestellt, der Verschleiß minimiert und die Abfallmenge verringert werden. Auch durch

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[13] GHG Protocol Land Sector and Removals Guidance (https://ghgprotocol.org/land-sector-and-removals- guidance)

[14] World Business Council for Sustainable Development (2023), Guidance on Avoided Emissions. (https://www.wbcsd.org/wp-content/uploads/2023/09/Climate-Avoided-Emissions-guidance_WBCSD.pdf).

[15] Rockström, J., Gaffney, O., Rogelj, J. et. al. 2017. Ein Fahrplan für die schnelle Dekarbonisierung. Science, Volume 355 Issue 6331. Verfügbar unter: https://www.stockholmresilience.org/research/research-news/2017-03-23-curbing- emissions-with-a-new-carbon-law.html.

[16] SBTI https://sciencebasedtargets.org/small-and-medium-enterprise-sme-target-setting-process. SBTI bietet Ressourcen für KMU zur Festlegung wissenschaftlich fundierter Ziele: https://sciencebasedtargets.org/small-and-medium-enterprise- sme-target-setting-process.

Durch die Automatisierung der Systeme und die Verwendung von Zeitschaltuhren zur Festlegung der Nutzungszeiten kann das Unternehmen die Emissionen dieser Geräte noch weiter senken.

224. Ein Klimaübergangsplan zur Eindämmung des Klimawandels ist eine Reihe von gegenwärtigen und zukünftigen ***Maßnahmen***, die das Geschäftsmodell, die Strategie und den Betrieb des Unternehmens mit dem übergeordneten globalen Ziel der Begrenzung der globalen Erwärmung auf 1,5°C in Einklang bringen sollen. Untermauert durch ein mit diesem Ziel kompatibles THG-Reduktionsziel liegt die Bedeutung eines Übergangsplans in der Fähigkeit, die Mittel zu verstehen, mit denen sich das Unternehmen in Richtung einer kohlenstoffarmen Wirtschaft bewegen wird, und gleichzeitig die erzielten Fortschritte zu verfolgen. Ein Übergangsplan dient Mechanismus für Rechenschaftspflicht und Transparenz und veranlasst die Unternehmen, glaubwürdige Wege zur Eindämmung des Klimawandels durch ihre Maßnahmen zu entwickeln.

225. Die Erstellung eines glaubwürdigen Übergangsplans für das Unternehmen sollte durch Elemente wie *(a) die* Festlegung klarer Zuständigkeiten und Rollen, *(b) die* Integration des Plans in die Geschäftsstrategie und Finanzplanung des Unternehmens unterstützt werden; *(c)* Informationen über Dekarbonisierungshebel und -pfade sowie quantifizierbare Indikatoren enthalten, die über vordefinierte Zeiträume hinweg überwacht werden können; *(d)* eine regelmäßige Überprüfung und Aktualisierung, gegebenenfalls nach Konsultation der Interessengruppen, ermöglichen; und *(e)* den gesamten eigenen Betrieb und so weit wie möglich die ***Wertschöpfungskette*** abdecken oder eine Erklärung für etwaige Einschränkungen liefern.

226. Unternehmen, die ***Ziele*** gemäß der EMAS-Verordnung Anhang IV B (d) offenlegen, können ihre THG-Reduktionsziele zur Erfüllung der VSME-Anforderung heranziehen, wenn sie solche Ziele festgelegt haben. Das Unternehmen kann diese Offenlegung auch durch die Anwendung des EMAS-Umweltmanagementsystems und die Verknüpfung mit EN ISO 14001:2015 unterstützen, wie in der EMAS-Verordnung Anhang II B A.6.2.1 und B.5 (Umweltziele) festgelegt.

Anleitung zur Identifizierung von Herstellungs-, Konstruktions- und/oder Verpackungsprozessen

227. Zur Identifizierung von Herstellungs-, Bau- und/oder Verpackungsprozessen kann sich das Unternehmen auf diese Tätigkeiten beziehen, die unter Abschnitt C - Herstellung, Abschnitt F - Bau sowie die Klasse N82.92 "Verpackungstätigkeiten" von Anhang I der Verordnung (EG) Nr. 1893/2006 fallen.

C4 - Klimarisiken

228. ***Klimabedingte Gefahren*** sind Treiber klimabedingter physischer Risiken, die sich aus den Auswirkungen des Klimawandels auf das Unternehmen ergeben. Sie lassen sich einteilen in akute Gefahren, die sich aus bestimmten Ereignissen ergeben (z. B. Dürren, Überschwemmungen, extreme Niederschläge und Waldbrände), und chronische Gefahren (z. B. Temperaturschwankungen, Anstieg des Meeresspiegels und Bodenerosion), die sich aus längerfristigen Veränderungen des Klimas ergeben (Delegierte Verordnung 2021/2139 der Kommission). Physische Risiken sind eine Funktion der klimabedingten Gefahren, der Exposition der Vermögenswerte und Tätigkeiten des Unternehmens gegenüber diesen Gefahren und der Empfindlichkeit des Unternehmens gegenüber diesen Gefahren. Beispiele für klimabedingte Gefahren sind Hitzewellen, die zunehmende Häufigkeit extremer Wetterereignisse, der Anstieg des Meeresspiegels, Gletscherseeausbrüche und veränderte Niederschlags- und Windmuster. Klimabedingte physische Risiken können anhand von Klimaszenarien ermittelt und modelliert werden, die hohe Emissionspfade wie IPCC SSP5-8.5 berücksichtigen.

229. ***Klimabezogene Übergangsereignisse*** können (gemäß der TCFD-Klassifizierung) politischer und rechtlicher Natur sein (z. B. verstärkte Verpflichtungen zur Emissionsberichterstattung), technologiebasiert (z. B. Kosten für den Übergang zu emissionsärmeren Technologien), marktbasiert (z. B. gestiegene Rohstoffkosten) und reputationsbasiert (z. B. erhöhte Besorgnis der Stakeholder).

230. ***Die Bruttoklimarisiken*** beziehen sich auf die physischen Bruttorisiken und die Brutto-Übergangsrisiken, die sich aus der Exposition der Vermögenswerte und Geschäftstätigkeiten des Unternehmens gegenüber klimabedingten Gefahren ergeben können.

Umfassender Modulleitfaden - Soziale Metriken C5 -

Zusätzliche (allgemeine) Merkmale der Belegschaft

231. Zur Ermittlung des Geschlechterverhältnisses teilen Sie die Zahl der weiblichen ***Beschäftigten*** durch die Zahl der männlichen Beschäftigten auf der . Daraus ergibt sich das Verhältnis von Frauen zu Männern in Ihrem Unternehmen.

$$Genderratio = \frac{numberoffemaleemployeesatmanagementlevel}{numberofmaleemployeesatmanagementlevel}$$

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232. Als Führungsebene gilt die Ebene unterhalb des Vorstands, es sei denn, das Unternehmen hat eine eigene Definition.

233. Wenn es beispielsweise 28 weibliche und 84 männliche Beschäftigte in der gibt, beträgt das Geschlechterverhältnis 1:3, d. h. auf eine Frau in der Führungsebene kommen drei Männer.

234. Relevante Faktoren, die ein Unternehmen bei der Entscheidung über die Offenlegung der Zahl der Selbständigen und Leiharbeitnehmer gemäß Absatz 60 berücksichtigen sollte, wären: (1) das Verhältnis von ***Arbeitnehmern*** zu Selbständigen und Leiharbeitnehmern, insbesondere im Falle einer erheblichen und/oder zunehmenden Abhängigkeit oder (2) wenn das Risiko negativer sozialer ***Auswirkungen*** auf Selbständige oder Leiharbeitnehmer im Vergleich zu den eigenen Arbeitnehmern des Unternehmens größer ist.

235. Die folgende Tabelle zeigt, wie Informationen über Selbstständige ohne Personal, die ausschließlich für das Unternehmen tätig sind, und über Leiharbeitnehmer, die von Unternehmen, die in erster Linie eine Beschäftigung ausüben, zur Verfügung gestellt werden, dargestellt werden können.

Arten von Arbeitnehmern	**Zahl der Selbstständigen und Zeitarbeitnehmer, die einer Beschäftigung nachgehen**
Selbstständige ohne Personal, die ausschließlich für das Unternehmen tätig sind, insgesamt Unternehmen	
Leiharbeitnehmer insgesamt, die von Unternehmen, die hauptsächlich im Bereich der Beschäftigung tätig sind, zur Verfügung gestellt werden Aktivitäten	

236. Unternehmen können sich auf den NACE-Code N78 für Leiharbeitnehmer beziehen, die von Unternehmen zur Verfügung gestellt werden, die hauptsächlich "Beschäftigungstätigkeiten" ausüben.

C6 - Zusätzliche Informationen für die eigene Belegschaft - Menschenrechtspolitik und -verfahren

237. Unternehmen, die über ein Verfahren zur Einhaltung der Sorgfaltspflicht in Bezug auf die Menschenrechte verfügen, können diese Frage positiv beantworten (JA) und über das Dropdown-Menü den Inhalt der Strategien und/oder Verfahren erläutern.

C7 - Schwerwiegende negative Vorfälle im Bereich der Menschenrechte

238. Ein "bestätigter ***Vorfall***" bezieht sich auf eine Klage oder Beschwerde, die bei dem Unternehmen oder den zuständigen Behörden im Rahmen eines förmlichen Verfahrens eingereicht wurde, oder auf einen Verstoß, der von Unternehmen im Rahmen etablierter Verfahren festgestellt wurde. Zu den etablierten Verfahren zur Ermittlung von Verstößen können Audits des Managementsystems, formelle Überwachungsprogramme oder ***Beschwerdemechanismen*** gehören.

Umfassender Leitfaden für Module - Metriken zum Geschäftsgebaren

C8 - Einnahmen aus bestimmten Sektoren und Ausschluss von den EU-Referenzbenchmarks

239. **Fossile Brennstoffe** sind gemäß der Definition in Artikel 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates nicht erneuerbare kohlenstoffbasierte Energiequellen wie feste Brennstoffe, Erdgas und Erdöl.

240. **Die Herstellung von Chemikalien** bezieht sich auf die in der Abteilung 20.2 des Anhangs I der Verordnung (EG) Nr. 1893/2006 aufgeführten Tätigkeiten, d. h. die Herstellung von Pestiziden und anderen agrochemischen Produkten.

241. Gemäß Artikel 12.1 und 12.2 der Delegierten Verordnung (EU) 2020/1818 der Kommission sind die folgenden Unternehmen von den an EU-Paris orientierten Benchmarks ausgeschlossen:

    (a) Unternehmen, die 1 % oder mehr ihrer Einnahmen aus der Exploration, dem Abbau, der Förderung, dem Vertrieb oder der Veredelung von Stein- und Braunkohle erzielen;

(b) Unternehmen, die 10 % oder mehr ihrer Einnahmen aus der Exploration, der Förderung, dem Vertrieb oder der Raffination von Erdölbrennstoffen erzielen;

(c) Unternehmen, die 50 % oder mehr ihrer Einnahmen aus der Exploration, Gewinnung, Herstellung oder dem Vertrieb von gasförmigen Brennstoffen erzielen, und

(d) Unternehmen, die 50 % oder mehr ihrer Einnahmen aus der Stromerzeugung mit einer Treibhausgasintensität von mehr als 100 g $_{CO2}$ e/kWh erzielen.

C9 - Geschlechtervielfalt im Leitungsorgan

242. Das Leitungsorgan ist die höchste Entscheidungsinstanz in einem Unternehmen. Je nach Rechtsordnung des Unternehmens und der Klassifizierung seiner Rechtspersönlichkeit kann das Leitungsorgan unterschiedlich gestaltet sein.

243. Auf der Grundlage der Anforderungen der SFDR wird die Geschlechterdiversität des Leitungsorgans als durchschnittliches Verhältnis von weiblichen und männlichen Mitgliedern des Leitungsorgans berechnet.

$$Genderdiversityratio = \frac{numberoffemalemembers}{numberofmalemembers}$$

Beispiel

244. Das Leitungsorgan eines bestimmten KMU setzt sich aus sechs Mitgliedern zusammen, darunter drei Frauen. Das Verhältnis der Geschlechtervielfalt ist eins - auf jedes weibliche Mitglied kommt ein männliches.

Anhang A: Definierte Begriffe

Dieser Anhang ist ein integraler Bestandteil dieser Norm.

Definierter Begriff	Definition
Verhütung von Unfällen	Unfallverhütung bezieht sich auf Maßnahmen und Initiativen zur Vermeidung von Arbeitsunfällen und zur Gewährleistung der Sicherheit und des Wohlbefindens der Mitarbeiter. Dazu gehören nicht nur Maßnahmen zur Verringerung physischer Risiken, sondern auch die Förderung eines sicheren und integrativen Arbeitsumfelds, das frei von Diskriminierung und Belästigung ist.
Aktionen	Maßnahmen beziehen sich auf (i) Aktionen und Aktionspläne (einschließlich Übergangsplänen), die durchgeführt werden, um sicherzustellen, dass das Unternehmen die gesetzten Ziele erreicht, und durch die das Unternehmen versucht, wesentliche Auswirkungen, Risiken und Chancen anzugehen; und (ii) Entscheidungen, diese mit finanziellen, personellen oder technischen Ressourcen zu unterstützen.
Betroffene Gemeinschaften	Menschen oder Gruppen, die in demselben geografischen Gebiet leben oder arbeiten und von den Tätigkeiten eines berichtenden Unternehmens oder seiner vor- und nachgelagerten Wertschöpfungskette betroffen sind oder betroffen sein können. Die Bandbreite der betroffenen Gemeinschaften reicht von denjenigen, die in der Nähe der Geschäftstätigkeit des Unternehmens leben (lokale Gemeinschaften), bis hin zu denjenigen, die in größerer Entfernung leben. Zu den betroffenen Gemeinschaften gehören auch tatsächlich und potenziell betroffene indigene Völker.
Empfindliches Gebiet für biologische Vielfalt	Zu den empfindlichen Gebieten der biologischen Vielfalt gehören: Natura-2000-Netz von Schutzgebieten, UNESCO-Welterbestätten und Schlüsselgebiete für die biologische Vielfalt (KBA) sowie andere Schutzgebiete gemäß Anhang II Anlage D der Delegierten Verordnung (EU) 2021/2139 der Kommission.
Geschäftsgebaren	Die folgenden Punkte werden zusammenfassend als "geschäftliche Verhaltensweisen" oder "geschäftliche Verhaltensweisen" bezeichnet: (a) Geschäftsethik und Unternehmenskultur, einschließlich Korruptions- und Bestechungsbekämpfung, Schutz von Informanten und Tierschutz; (b) die Verwaltung der Beziehungen zu den Lieferanten, einschließlich der Zahlungsmoral, insbesondere im Hinblick auf den Zahlungsverzug bei kleinen und mittleren Unternehmen. (c) Tätigkeiten und Verpflichtungen des Unternehmens im Zusammenhang mit der Ausübung seines politischen Einflusses, einschließlich seiner Lobbytätigkeit.
Kinderarbeit	Arbeit, die Kinder ihrer Kindheit, ihres Potenzials und ihrer Würde beraubt und ihre körperliche und geistige Entwicklung beeinträchtigt. Dazu gehört auch Arbeit, die geistig, körperlich, sozial oder moralisch gefährlich ist und/oder ihre Schulbildung beeinträchtigt (indem sie sie daran hindert, die Schule zu besuchen).
Kollektivverhandlungen	Alle Verhandlungen, die zwischen einem Arbeitgeber, einer Gruppe von Arbeitgebern oder einer oder mehreren Arbeitgeberorganisationen einerseits und einer oder mehreren Gewerkschaften oder, in Ermangelung solcher Gewerkschaften, den von ihnen gemäß den einzelstaatlichen Rechtsvorschriften ordnungsgemäß gewählten und bevollmächtigten Arbeitnehmervertretern andererseits geführt werden, um i) die Arbeits- und Beschäftigungsbedingungen festzulegen und/oder ii) die Beziehungen zwischen Arbeitgebern und Arbeitnehmern und/oder die Beziehungen zwischen Arbeitgebern oder ihren Organisationen und einer oder mehreren zu regeln.
Korruption	Missbrauch von anvertrauter Macht zum privaten Vorteil, der von Einzelpersonen oder Organisationen betrieben werden kann. Dazu gehören Praktiken wie die Erleichterung

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Definierter Begriff	Definition
	Zahlungen, Betrug, Erpressung, geheime Absprachen und Geldwäscherei. Der Begriff umfasst auch das Angebot oder die Entgegennahme von Geschenken, Darlehen, Gebühren, Belohnungen oder anderen Vorteilen an oder von Personen als Anreiz, etwas zu tun, was unehrlich oder illegal ist oder das Vertrauen in die Geschäftstätigkeit des Unternehmens missbraucht. Dies kann Geld- oder Sachleistungen umfassen, wie z. B. kostenlose Waren, Geschenke und Urlaube, oder besondere persönliche Dienstleistungen, die zum Zweck eines unzulässigen Vorteils angeboten werden oder die zu einem moralischen Druck führen können, einen solchen Vorteil zu erhalten.
Verbraucher	Personen, die Waren und Dienstleistungen für den persönlichen Gebrauch für sich selbst oder für andere erwerben, verbrauchen oder nutzen und nicht für den Wiederverkauf, den Handel, das Gewerbe, das Handwerk oder den Beruf.
Klassifizierte Informationen	EU-Verschlusssachen im Sinne des Beschlusses des Rates vom 23. September 2013 über die Sicherheitsvorschriften für den Schutz von EU-Verschlusssachen (2013/488/EU) oder von einem als Verschlusssache eingestufte Informationen, die gemäß Anhang B des genannten Ratsbeschlusses gekennzeichnet sind. EU-Verschlusssachen sind alle durch einen EU-Geheimhaltungsgrad gekennzeichneten Informationen, deren unbefugte Weitergabe den Interessen der Europäischen Union oder eines oder mehrerer Mitgliedstaaten in unterschiedlichem Maße schaden könnte. Verschlusssachen können in vier Stufen eingestuft werden: streng geheim, geheim, vertraulich, eingeschränkt (gemäß der Definition im Ratsbeschluss).
Grundsätze der Kreislaufwirtschaft	Die europäischen Grundsätze der Kreislaufwirtschaft sind Nutzbarkeit, Wiederverwendbarkeit, Reparierbarkeit, Zerlegbarkeit, Wiederaufbereitung oder Aufarbeitung, Recycling, Rückführung in den biologischen Kreislauf und andere mögliche Optimierungen der Produkt- und Materialnutzung.
Anpassung an den Klimawandel	Der Prozess der Anpassung an den tatsächlichen und erwarteten Klimawandel und seine Auswirkungen.
Klimabedingte physische Risiken	Risiken, die sich aus dem Klimawandel ergeben und die ereignisbedingt (akut) oder durch längerfristige Veränderungen (chronisch) der Klimamuster bedingt sein können. Akute physische Risiken entstehen durch bestimmte Gefahren, insbesondere durch wetterbedingte Ereignisse Stürme, Überschwemmungen, Brände oder Hitzewellen. Chronische physische Risiken ergeben sich aus längerfristigen Veränderungen des Klimas, wie z. B. Temperaturveränderungen und deren Auswirkungen auf den Anstieg des Meeresspiegels, eine geringere Wasserverfügbarkeit, den Verlust der biologischen Vielfalt und Veränderungen der Produktivität von Land und Boden.
Direkte Treibhausgasemissionen (Scope 1)	Direkte Treibhausgasemissionen aus Quellen, die sich im Besitz oder unter der Kontrolle des Unternehmens befinden.
Diskriminierung	Diskriminierung kann direkt oder indirekt erfolgen. Unmittelbare Diskriminierung liegt vor, wenn eine Person im Vergleich zu anderen, die sich in einer ähnlichen Situation befinden, weniger günstig behandelt wird. Indirekte Diskriminierung liegt vor, wenn eine scheinbar neutrale Regelung eine Person oder eine Gruppe mit denselben Merkmalen benachteiligt.
Mitarbeiter	Eine Person, die nach nationalem Recht oder Praxis in einem Arbeitsverhältnis mit dem Unternehmen steht.
Endnutzer	Personen, die ein bestimmtes Produkt oder eine bestimmte Dienstleistung letztlich nutzen oder nutzen sollen.
Zwangsarbeit	Jede Arbeit oder Dienstleistung, die von einer Person unter Androhung einer Strafe verlangt wird und für die sich die Person nicht selbst angeboten hat

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Definierter Begriff	Definition
	freiwillig gemäß dem IAO-Übereinkommen über Zwangsarbeit, 1930 (Nr. 29). Der Begriff umfasst alle Situationen, in denen Personen mit irgendwelchen Mitteln zur Arbeitsleistung gezwungen werden.
Beschwerdemechanismus	Alle routinemäßigen, staatlichen oder nichtstaatlichen, gerichtlichen oder außergerichtlichen Verfahren, über die Betroffene Beschwerden vorbringen und Rechtsmittel einlegen können. Beispiele für staatliche gerichtliche und nicht-gerichtliche Beschwerdemechanismen sind Gerichte, Arbeitsgerichte, nationale Menschenrechtsinstitutionen, nationale Kontaktstellen gemäß den OECD-Leitsätzen für multinationale Unternehmen, Ombudsstellen, Verbraucherschutzbehörden, Regulierungsbehörden und staatliche Beschwerdestellen. Zu den nichtstaatlichen Beschwerdemechanismen gehören solche, die vom Unternehmen allein oder gemeinsam mit Interessengruppen verwaltet werden, wie etwa Beschwerdemechanismen auf betrieblicher Ebene und Tarifverhandlungen, einschließlich der durch Tarifverhandlungen geschaffenen Mechanismen. Dazu gehören auch Mechanismen, die von Branchenverbänden, internationalen Organisationen, Organisationen der Zivilgesellschaft oder Multi-Stakeholder-Gruppen verwaltet werden. Beschwerdemechanismen auf betrieblicher Ebene werden entweder von der Organisation allein oder in Zusammenarbeit mit anderen Parteien verwaltet und sind für die Interessengruppen der Organisation direkt zugänglich. Sie ermöglichen es, Missstände frühzeitig und direkt zu erkennen und zu beheben und so eine Eskalation von Schaden und Missständen zu verhindern. Sie liefern auch wichtige Rückmeldungen über die Wirksamkeit der Sorgfaltspflicht der Organisation von Seiten der direkt Betroffenen. Laut UN-Leitprinzip 31 sind wirksame Beschwerdemechanismen legitim, zugänglich, vorhersehbar, gerecht, transparent, mit den Rechten vereinbar und eine Quelle für kontinuierliches Lernen. Neben diesen Kriterien wirksame Beschwerdemechanismen auf operativer Ebene auch auf Engagement und Dialog. Für die Organisation kann es schwieriger sein, die Wirksamkeit von Beschwerdemechanismen zu beurteilen, an denen sie beteiligt ist, als von solchen, die sie selbst eingerichtet hat.
Treibhausgase (GHG)	Für die Zwecke dieser Norm sind Treibhausgase die sechs im Kyoto-Protokoll aufgeführten Gase: Kohlendioxid (CO_2), Methan (CH_4), Distickstoffoxid (N_2O), Stickstofftrifluorid (NF_3), teilhalogenierte Fluorkohlenwasserstoffe (HFC), perfluorierte Kohlenwasserstoffe (PFC) und Schwefelhexafluorid (SF_6).
Governance	Die Unternehmensführung ist das System von Regeln, Praktiken und Verfahren, durch das ein Unternehmen geleitet und kontrolliert wird.
Brutto-Treibhausgasemissionen (THG)	Die Brutto-Treibhausgasemissionen (THG-Emissionen) sind die gesamten THG-Emissionen, die das Unternehmen in die Atmosphäre abgibt, ohne Berücksichtigung von Abzügen für den Kohlenstoffabbau oder anderen Anpassungen.
Gefährliche Abfälle	Abfälle, die eine oder mehrere der in Anhang III der Richtlinie 2008/98/EG des Europäischen Parlaments und des Rates über Abfälle aufgeführten gefährlichen Eigenschaften aufweisen.
Menschenschmuggel	Die Anwerbung, Beförderung, Verbringung, Beherbergung oder Aufnahme von Personen, einschließlich des Austauschs oder der Übertragung der Kontrolle über diese Personen, durch die Androhung oder Anwendung von Gewalt oder anderen Formen der Nötigung, durch Entführung, Betrug, Täuschung, Missbrauch von Macht oder Ausnutzung besonderer Hilflosigkeit oder durch Gewährung oder Entgegennahme von Zahlungen oder Vorteilen zur Erlangung des Einverständnisses einer Person, die Gewalt über eine andere Person hat, zum Zweck der Ausbeutung.

Definierter Begriff	Definition
Vorfall	Eine Klage oder Beschwerde, die bei dem Unternehmen oder den zuständigen Behörden im Rahmen eines förmlichen Verfahrens eingereicht wurde, oder ein Verstoß, der von dem Unternehmen im Rahmen der festgelegten Verfahren festgestellt wurde. Zu den etablierten Verfahren zur Ermittlung von Verstößen können Audits des Managementsystems, formelle Überwachungsprogramme oder Beschwerdemechanismen gehören.
Indirekte Treibhausgasemissionen (Scope 2)	Indirekte Emissionen sind eine Folge der Tätigkeit des Unternehmens, entstehen aber an Quellen, die einem anderen Unternehmen gehören oder von ihm kontrolliert werden. Scope 2 THG-Emissionen sind indirekte Emissionen aus Erzeugung von gekauftem oder erworbenem Strom, Dampf und Wärme oder Kälte, die vom Unternehmen verbraucht werden.
Auswirkungen	Auswirkungen beziehen sich auf die Auswirkungen, die eine Organisation auf die Wirtschaft, die Umwelt und die Menschen hat oder haben könnte, einschließlich der Auswirkungen auf die Menschenrechte, die sich aus den Aktivitäten oder Geschäftsbeziehungen der Organisation ergeben. Die Auswirkungen können tatsächlich oder potenziell, negativ oder positiv, kurzfristig oder langfristig, beabsichtigt oder unbeabsichtigt, direkt oder indirekt, reversibel oder irreversibel sein. Diese Auswirkungen zeigen den negativen oder positiven Beitrag der Organisation zur nachhaltigen Entwicklung. Die Auswirkungen auf die Wirtschaft, die Umwelt und die Menschen sind miteinander verknüpft. Die Auswirkungen der Organisation auf die Umwelt beziehen sich auf die Auswirkungen auf lebende Organismen und nicht lebende Elemente, einschließlich Luft, Land, Wasser und Ökosysteme. Eine Organisation kann beispielsweise durch die Nutzung von Energie, Land, Wasser und anderen natürlichen Ressourcen Auswirkungen auf die Umwelt haben. Die Auswirkungen der Organisation auf Menschen beziehen sich auf die Auswirkungen auf Einzelpersonen und Gruppen, wie Gemeinden, gefährdete Gruppen oder die Gesellschaft. Dazu gehören auch die Auswirkungen, die die Organisation auf die der Menschen hat. Eine Organisation kann Auswirkungen auf Menschen haben, z. B. durch ihre Beschäftigungspraktiken (z. B. die Löhne, die sie ihren Mitarbeitern zahlt), ihre Lieferkette (z. B. die Arbeitsbedingungen der Mitarbeiter von Zulieferern) und ihre Produkte und Dienstleistungen (z. B. deren Sicherheit oder Zugänglichkeit).
Landnutzung (Veränderung)	Die Nutzung eines bestimmten Gebiets durch den Menschen zu einem bestimmten Zweck (z. B. Wohnen, Landwirtschaft, Erholung, Industrie usw.). Beeinflusst durch die Bodenbedeckung (Gras, Asphalt, Bäume, nackter Boden, Wasser, usw.). Landnutzungsänderung bezieht sich auf eine Änderung der Nutzung oder Bewirtschaftung von Land durch den Menschen, die zu einer Änderung der Bodenbedeckung führen kann.
Standortbezogene Scope-2-Emissionen	Emissionen aus Elektrizität, Wärme, Dampf und Kälte, die vom meldenden Unternehmen gekauft oder erworben und verbraucht werden, berechnet nach der standortbezogenen "Zuteilungs"-Methode, bei der die Emissionen der Erzeuger den Endverbrauchern zugeordnet werden. Sie spiegeln die durchschnittliche Emissionsintensität der Netze wider, in denen der Energieverbrauch stattfindet, und verwenden meist netzdurchschnittliche Emissionsfaktordaten. Typische Quellen von Scope-2-Emissionen sind alle Geräte, die Strom (Elektromotoren, Beleuchtung, Gebäude usw.), Wärme (Heizung in Industrieprozessen, Gebäuden usw.), Dampf (Industrieprozesse) und Kälte (Industrieprozesse, Gebäude usw.) verbrauchen.
Naturnahes Gebiet	Ein "naturnahes Gebiet" ist ein Gebiet, das in erster Linie der Erhaltung oder Wiederherstellung der Natur dient. Sie können sich auf dem Gelände befinden und Elemente wie Dächer, Fassaden und Wasserabläufe umfassen, die die biologische Vielfalt fördern. Naturnahe Flächen können auch außerhalb des Geländes liegen Organisationsgelände, sofern das Gebiet Eigentum der Organisation ist oder von ihr (mit-)verwaltet wird

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Definierter Begriff	Definition
	Organisation und widmet sich in erster Linie der Förderung der biologischen Vielfalt. (In Anlehnung an die EMAS-Verordnung)
In der Nähe (Biodiversitätssensibles Gebiet)	Im Zusammenhang mit B5 - Biologische Vielfalt bezieht sich der Begriff "in der Nähe" auf ein Gebiet, sich (teilweise) mit einem für die biologische Vielfalt empfindlichen Gebiet überschneidet oder an ein solches angrenzt.
Eigene Arbeitskräfte/eigene Arbeitnehmer	Arbeitnehmer, die in einem Beschäftigungsverhältnis mit dem Unternehmen stehen ("Arbeitnehmer"), und Nicht-Arbeitnehmer, die entweder einzelne Auftragnehmer sind, die dem Unternehmen Arbeitskräfte zur Verfügung stellen ("Selbständige"), oder Personen, die von Unternehmen zur Verfügung gestellt werden, die hauptsächlich "Beschäftigungstätigkeiten" ausüben (NACE-Code N78).
Bezahlen	Der gewöhnliche Grund- oder Mindestlohn sowie alle sonstigen Geld- oder Sachbezüge, die der Arbeitnehmer im Rahmen seines Arbeitsverhältnisses von seinem Arbeitgeber direkt oder indirekt erhält ("ergänzende oder variable Bestandteile"). Unter "Lohnniveau" sind das Bruttojahresentgelt und das entsprechende Bruttostundenentgelt zu verstehen. Das "mittlere Lohnniveau" ist das Lohnniveau des Arbeitnehmers, bei dem die Hälfte der Arbeitnehmer mehr und die Hälfte weniger verdienen würde als sie.
Politik	Eine Reihe oder ein Rahmen von allgemeinen Zielen und Managementgrundsätzen, die das Unternehmen für die Entscheidungsfindung verwendet. Eine Politik setzt die Strategie des Unternehmens oder Managemententscheidungen in Bezug auf ein Nachhaltigkeitsthema um. Jede Politik unterliegt der Verantwortung einer oder mehrerer bestimmter Personen, legt ihren Anwendungsbereich fest und enthält ein oder mehrere Ziele (gegebenenfalls in Verbindung mit messbaren Vorgaben). Eine Politik wird durch Maßnahmen oder Aktionspläne umgesetzt. Unternehmen, die über weniger Ressourcen verfügen, haben möglicherweise nur wenige (oder gar keine) schriftlich fixierte Strategien, was aber nicht unbedingt bedeutet, dass sie keine Strategien haben. Wenn das Unternehmen noch keine Politik formuliert hat, aber Maßnahmen durchgeführt oder Ziele festgelegt hat, mit denen das Unternehmen Nachhaltigkeitsprobleme angehen will, hat es diese offen zu legen.
Radioaktive Abfälle	Alle radioaktiven Stoffe in gasförmiger, flüssiger oder fester Form, für die keine weitere Verwendung vorgesehen ist, gemäß Artikel 3 Absatz 7 der Richtlinie 2011/70/Euratom .des Rates17
Meldepflichtiger Arbeitsunfall / Meldepflichtige arbeitsbedingte Verletzung oder Erkrankung	Ein Arbeitsunfall ist ein Ereignis, das zu einem körperlichen oder geistigen Schaden, also zu einer Verletzung oder Erkrankung, führt. Er ereignet sich während der Ausübung einer beruflichen Tätigkeit oder während der Zeit, die man bei der Arbeit verbringt. Meldepflichtig bedeutet, dass die Diagnose von einem Arzt oder einem anderen zugelassenen Angehörigen der Gesundheitsberufe gestellt wird. Arbeitsbedingte Verletzungen oder Krankheiten können folgende Folgen haben: Tod, Arbeitsunfähigkeit, eingeschränkte Arbeit oder Versetzung an einen anderen Arbeitsplatz, medizinische

[17] Richtlinie 2011/70/Euratom des Rates vom 19. Juli 2011 über einen Gemeinschaftsrahmen für die verantwortungsvolle und sichere Entsorgung abgebrannter Brennelemente und radioaktiver Abfälle.[18]Artikel 2 Absatz 1 Richtlinie (EU) 2018/2001 des Europäischen Parlaments und des Rates vom 11. Dezember zur Förderung der Nutzung von Energie aus erneuerbaren Quellen (ABl. L 328 vom 21.12.2018, S. 82).[19] Diese Offenlegungspflicht steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission - Vorlage 5: Anlagebuch - Physisches Risiko des Klimawandels: Risikopositionen, die einem physischen Risiko unterliegen.

Definierter Begriff	Definition
	Behandlung, die über die erste Hilfe hinausgeht, oder Bewusstlosigkeit. Verletzungen, die keine über die erste Hilfe hinausgehende medizinische Behandlung erfordern, sind in der Regel nicht meldepflichtig.
Recycling	Jedes Verwertungsverfahren, bei dem Abfallmaterialien zu Produkten, Materialien oder Stoffen für den ursprünglichen oder einen anderen Zweck wiederaufbereitet werden. Der Begriff umfasst die Aufbereitung von organischem Material, nicht aber die energetische Verwertung und die Aufbereitung zu Materialien, die als Brennstoffe oder zur Verfüllung verwendet werden sollen.
Erneuerbare Energie	Energie aus erneuerbaren, nicht-fossilen Quellen, d. h. Wind, Sonne (Solarthermie und Photovoltaik) und , Umweltenergie, Gezeiten-, Wellen- und andere Meeresenergie, Wasserkraft, Biomasse, Deponiegas, Klärgas und Biogas[18].
Versiegelter Bereich	Eine versiegelte Fläche ist eine Fläche, auf der der ursprüngliche Boden überdeckt wurde (z. B. Straßen), so dass er undurchlässig ist. Diese Undurchlässigkeit kann auf die Umwelt auswirken.
Sensible Informationen	Sensible Informationen im Sinne der Verordnung (EU) 2021/697 des Europäischen Parlaments und des Rates vom 29. April 2021 zur Einrichtung des Europäischen Verteidigungsfonds. Sensible Informationen sind Informationen und Daten, einschließlich Verschlusssachen, die aufgrund von Verpflichtungen nach Unionsrecht oder nationalem Recht oder zum Schutz der Privatsphäre oder der Sicherheit einer natürlichen oder juristischen Person vor unbefugtem Zugang oder unbefugter Weitergabe geschützt werden müssen.
Website	Der Standort einer oder mehrerer physischer Anlagen. Wenn es mehr als eine physische Anlage desselben oder verschiedener Eigentümer oder Betreiber gibt und bestimmte Infrastrukturen und Einrichtungen gemeinsam genutzt werden, kann das gesamte Gebiet, in dem sich die physischen Anlagen befinden, einen Standort darstellen.
Ziele	Messbare, ergebnisorientierte und zeitgebundene Ziele, die das KMU in Bezug auf Nachhaltigkeitsfragen erreichen will. Sie können von dem KMU freiwillig festgelegt werden oder sich aus gesetzlichen Anforderungen an das Unternehmen ergeben.
Zeithorizonte	Bei der Erstellung seines Nachhaltigkeitsberichts geht das Unternehmen von folgenden Zeithorizonten aus: (a) für den kurzfristigen Zeithorizont von einem Jahr; (b) für den mittelfristigen Zeithorizont von zwei bis fünf Jahren; und (c) für den langfristigen Zeithorizont von mehr als fünf Jahren.
Ausbildung	Initiativen des Unternehmens, die darauf abzielen, die Fähigkeiten und Kenntnisse der eigenen Arbeitnehmer zu erhalten und/oder zu verbessern. Sie können verschiedene Methoden umfassen, z. B. Schulungen vor Ort und Online-Schulungen.

[18]Artikel 2 Absatz 1 der Richtlinie (EU) 2018/2001 des Europäischen Parlaments und des Rates vom 11. Dezember 2018 zur Förderung der Nutzung von Energie aus erneuerbaren Quellen (ABl. L 328 vom 21.12.2018, S. 82).[19] Diese Offenlegungspflicht steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission - Vorlage 5: Anlagebuch - Physisches Risiko des Klimawandels: Risikopositionen, die einem physischen Risiko unterliegen.

Definierter Begriff	Definition
Wertschöpfungskette	Die Gesamtheit der Tätigkeiten, Ressourcen und Beziehungen im Zusammenhang mit dem Geschäftsmodell des Unternehmens und dem externen Umfeld, in dem es tätig ist. Eine Wertschöpfungskette umfasst die Tätigkeiten, Ressourcen und Beziehungen, die das Unternehmen nutzt und auf die es sich stützt, um seine Produkte oder Dienstleistungen von der Konzeption bis zur Auslieferung, dem Verbrauch und dem Ende der Lebensdauer herzustellen. Zu den relevanten Tätigkeiten, Ressourcen und Beziehungen gehören: a) die des eigenen , wie z. B. die Humanressourcen; b) die entlang der Liefer-, Marketing- und Vertriebskanäle, wie z. B. die Beschaffung von Materialien und Dienstleistungen sowie der Verkauf und die Lieferung von Produkten und Dienstleistungen; und c) das finanzielle, geografische, geopolitische und regulatorische Umfeld, in dem das Unternehmen tätig ist. Die Wertschöpfungskette umfasst Akteure, die dem Unternehmen vor- und nachgelagert sind. Akteure, die dem Unternehmen vorgelagert sind (z. B. Zulieferer), liefern Produkte oder Dienstleistungen, die bei der Entwicklung der Produkte oder Dienstleistungen des Unternehmens verwendet werden. Dem Unternehmen nachgelagerte Akteure (z. B. Händler, Kunden) erhalten Produkte oder Dienstleistungen von dem Unternehmen.
Löhne	Bruttolohn, ohne variable Bestandteile wie Überstunden und Leistungsprämien und ohne Zulagen, sofern diese nicht garantiert sind.
Wasserverbrauch	Die Wassermenge, die während des Berichtszeitraums innerhalb der Grenzen des Unternehmens (oder der Anlage) entnommen und nicht wieder in die Gewässer oder an abgegeben wurde.
Wasserentnahme	Die Summe des gesamten Wassers, das während des Berichtszeitraums aus allen Quellen für irgendeinen Verwendungszweck innerhalb der Grenzen des Unternehmens entnommen wurde.
Arbeitnehmer in der Wertschöpfungskette	Eine Person, die eine Arbeit in der Wertschöpfungskette des Unternehmens ausführt, unabhängig von der Existenz oder der Art einer vertraglichen Beziehung mit dem Unternehmen. Im ESRS umfasst der Geltungsbereich von Arbeitnehmern in der Wertschöpfungskette alle Arbeitnehmer in der vor- und nachgelagerten Wertschöpfungskette des Unternehmens, die von dem Unternehmen wesentlich betroffen sind oder betroffen sein können. Dies schließt Auswirkungen ein, die mit dem eigenen Betrieb und der Wertschöpfungskette des Unternehmens verbunden sind, auch durch seine Produkte oder Dienstleistungen sowie durch seine Geschäftsbeziehungen. Dies schließt alle Arbeitnehmer ein, die nicht unter den Begriff "Eigene Arbeitskräfte" fallen ("Eigene Arbeitskräfte" sind Personen, die in einem Arbeitsverhältnis mit dem Unternehmen stehen ("Arbeitnehmer"), und Nicht-Arbeitnehmer, die entweder einzelne Auftragnehmer sind, die dem Unternehmen Arbeitskräfte zur Verfügung stellen ("Selbständige"), oder Personen, die von Unternehmen zur Verfügung gestellt werden, die hauptsächlich im Bereich der Beschäftigung tätig sind (NACE-Code N78).

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Anhang B: Liste der möglichen Nachhaltigkeitsthemen

Der nachstehende Anhang ist integraler Bestandteil dieses Standards und enthält eine Liste möglicher Nachhaltigkeitsthemen.

Thema	Thema Nachhaltigkeit: Unterthema	Thema Nachhaltigkeit: Unterthema
Der Klimawandel	– Anpassung an den Klimawandel – Eindämmung des Klimawandels – Energie	
Verschmutzung	– Verschmutzung der Luft – Verschmutzung des Wassers – Verschmutzung des Bodens – Verschmutzung von lebenden Organismen und Nahrungsressourcen – Bedenkliche Stoffe – Besonders besorgniserregende Stoffe – Mikroplastik	
Wasser und Marine Ressourcen	– Wasser – Meeresressourcen	– Wasserverbrauch – Wasserentnahmen – Wassereinleitungen – Wassereinleitungen in die Weltmeere – Gewinnung und Nutzung von Meeresressourcen
Biologische Vielfalt und Ökosysteme	– Direkte Auswirkungen auf den Verlust der biologischen Vielfalt	– Klimawandel – Änderung der Landnutzung, der Süßwassernutzung und der Meeresnutzung – Direkte Ausbeutung – Invasive gebietsfremde Arten – Verschmutzung – Andere
	– Auswirkungen auf den Zustand der Arten	– Beispiele: – Größe der Population einer Art – Globales Aussterberisiko der Arten
	– Auswirkungen auf den Umfang und den Zustand der Ökosysteme	– Beispiele: – Bodendegradation – Wüstenbildung – Bodenversiegelung
	– Auswirkungen und Abhängigkeiten auf Ökosystemleistungen	
Kreislaufwirtschaft	– Ressourcen Zuflüsse, einschließlich Ressourcennutzung – Ressourcen Abflüsse im Zusammenhang mit zu Produkte und Dienstleistungen – Abfall	
Eigene Arbeitskräfte	– Arbeitsbedingungen	– Sichere – Beschäftigung Arbeitszeit – Angemessene Löhne – Sozialer Dialog

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Thema	**Thema Nachhaltigkeit: Unterthema**	**Thema Nachhaltigkeit: Unterthema**
		– Vereinigungsfreiheit, das Bestehen von Betriebsräten und der Information, Anhörungs- und Mitwirkungsrechte von Arbeiter – Tarifverhandlungen, einschließlich der Höhe der Arbeitnehmer, die unter Tarifverträge fallen – Vereinbarkeit von Berufs- und Privatleben – Gesundheit und Sicherheit
	– Gleichbehandlung und Chancengleichheit für alle	– Gleichstellung der Geschlechter und gleiches Entgelt für die Arbeit von Gleichwertigkeit – Ausbildung und Kompetenzentwicklung – Beschäftigung und Eingliederung von Personen mit Behinderungen – Maßnahmen gegen Gewalt und Belästigung am Arbeitsplatz – Vielfalt
	– Sonstige arbeitsbezogene Rechte	– Kinderarbeit – Zwangsarbeit – Angemessener Wohnraum – Datenschutz
Beschäftigte in der Wertschöpfungskette	– Arbeitsbedingungen	– Sichere – Beschäftigung – Arbeitszeit Angemessene Löhne – Sozialer Dialog – Vereinigungsfreiheit, einschließlich der Existenz von Betriebsräten – Kollektivverhandlungen – Vereinbarkeit von Berufs- und Privatleben – Gesundheit und Sicherheit
	– Gleichbehandlung und Chancengleichheit für alle	– Gleichstellung der Geschlechter und gleiches Entgelt für die Arbeit von Gleichwertigkeit – Ausbildung und Kompetenzentwicklung – Die Beschäftigung und Eingliederung von Personen mit Behinderungen – Maßnahmen gegen Gewalt und Belästigung am Arbeitsplatz – Vielfalt
	– Sonstige arbeitsbezogene Rechte	– Kinderarbeit – Zwangsarbeit – Angemessener Wohnraum – Wasser und sanitäre Einrichtungen – Datenschutz

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Betroffene Gemeinschaften	– Die wirtschaftlichen, sozialen und kulturellen Rechte der Gemeinschaften	– Angemessener – Wohnraum – Angemessene – Ernährung Wasser und Abwasserentsorgung Landbezogene Auswirkungen

Thema	**Thema Nachhaltigkeit: Unterthema**	**Thema Nachhaltigkeit: Unterthema**
		– Sicherheitsrelevante Auswirkungen
	– Bürgerliche und politische Rechte der Gemeinschaften	– Freiheit der Meinungsäußerung – Versammlungsfreiheit – Auswirkungen auf Menschenrechtsverteidiger
	– Rechte indigener Gemeinschaften	– Freie, vorherige und informierte – Zustimmung Selbstbestimmung – Kulturelle Rechte
Verbraucher und Endnutzer	– Informationsbezogen für Auswirkungen auf die Verbraucher und/oder Endnutzer	– Datenschutz – Freiheit der Meinungsäußerung – Zugang zu (hochwertigen) Informationen
	– Persönliche Sicherheit von Verbrauchern und/oder Endnutzern	– Gesundheit und Sicherheit – Sicherheit einer Person – Schutz von Kindern
	– Soziale Eingliederung von Verbrauchern und/oder Endnutzern	– Nicht-Diskriminierung – Zugang zu Produkten und Dienstleistungen – Verantwortungsvolle Marketingpraktiken
Business durchführen	– Unternehmenskultur – Schutz von Whistleblowern – Tierschutz – Politisches Engagement – Verwaltung der Beziehungen zu den Lieferanten, einschließlich der Zahlungsmodalitäten	
	– Korruption und Bestechung	– Vorbeugung und Aufdeckung, einschließlich – Schulung Zwischenfälle

Anhang C: Hintergrundinformationen für Finanzmarktteilnehmer, die Nutzer der nach diesem Standard erstellten Informationen sind (Abgleich mit anderen EU-Vorschriften)

245. Dieser Anhang ist für die Nutzer des Nachhaltigkeitsberichts relevant. Die nachstehende Tabelle veranschaulicht die Datenpunkte für nachhaltige Finanzen, die in verschiedenen Modulen dieses Standards enthalten sind und die Anforderungen verschiedener Nutzertypen (Banken, Investoren, Großunternehmen) erfüllen.

246. Die Spalte "DR-Nummer und Titel" identifiziert die Angaben in den verschiedenen Modulen (d.h. Basismodul und umfassendes Modul), bei denen es sich um Datenpunkte zu nachhaltigen Finanzen handelt. Die Spalte "SFDR Tabelle 1" und/oder "EBA Säule 3" und/oder "Benchmark-Verordnung" veranschaulicht, wie sich diese Angaben auf diese Vorschriften beziehen, die für die Nutzer des Nachhaltigkeitsberichts (Banken, andere Investoren) relevant sind.

<table>
<tr><th>Thema: Umwelt / Soziales / Governance</th><th>DR-Nummer und Titel</th><th>SFDR Tabelle 1
und/oder
EBA-Säule 3
und/oder
Benchmark-Verordnung</th></tr>
<tr><td colspan="3">Grundmodul</td></tr>
<tr><td>Allgemeine Informationen</td><td>B1 - Grundlagen der Erstellung
Das Unternehmen muss offengelegt werden:
vii. Geolokalisierung von Standorten, die Eigentum sind, gepachtet oder verwaltet werden.</td><td>EBA-Säule 3[19]</td></tr>
<tr><td>Umwelt</td><td>B3 - Energie und Treibhausgasemissionen
Das Unternehmen gibt seinen Gesamtenergieverbrauch in MWh mit einer Aufschlüsselung gemäß der nachstehenden Tabelle an, wenn es die erforderlichen Informationen für eine solche Aufschlüsselung erhalten kann:
<table>
<tr><th></th><th>Erneuerbar</th><th>Nicht erneuerbar</th><th>Insgesamt</th></tr>
<tr><td>Elektrizität (wie in den Rechnungen der Versorgungsunternehmen angegeben)</td><td></td><td></td><td></td></tr>
<tr><td>Kraftstoffe</td><td></td><td></td><td></td></tr>
<tr><td>Insgesamt</td><td colspan="3"></td></tr>
</table></td><td>SFDR20</td></tr>
</table>

[19] Diese Offenlegungsanforderung steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission - Vorlage 5: Anlagebuch - Physisches Risiko des Klimawandels: Risikopositionen, die einem physischen Risiko unterliegen.

[20] Verordnung (EU) 2019/2088 (SFDR), obligatorischer Indikator Nr. 5 in Tabelle 1 von Anhang I ("Anteil des Verbrauchs und der Erzeugung von nicht erneuerbaren Energien").

Umwelt	**B3 - Energie und Treibhausgasemissionen** Das Unternehmen legt seine geschätzten ***Brutto-Treibhausgasemissionen (THG)*** in Tonnen CO2-Äquivalent ($_{tCO2eq}$) unter Berücksichtigung des Inhalts des GHG Protocol Corporate Standard (Version 2004) offen, einschließlich: (a) die Scope-1-THG-Emissionen in $_{tCO2eq}$ (aus eigenen oder kontrollierten Quellen); und (b) die standortbezogenen Scope-2-Emissionen in tCO2eq (d. h. Emissionen aus der Erzeugung von zugekaufter Energie wie Strom, Wärme, Dampf oder Kälte).	SFDR21 Richtwert22
Umwelt	**B3 - Energie und Treibhausgasemissionen** Das Unternehmen gibt seine Treibhausgasintensität an, die berechnet wird, indem die gemäß Absatz 30 angegebenen "gesamten Treibhausgasemissionen" durch den gemäß Absatz 24 Buchstabe e Ziffer iv angegebenen "Umsatz (in Euro)" geteilt werden.	**SFDR[23]** **Benchmark[24]**
Umwelt	**B4 - Verschmutzung von Luft, Wasser und Boden** das Unternehmen bereits aufgrund von Gesetzen oder anderen nationalen Vorschriften verpflichtet, den zuständigen Behörden über seine Schadstoffemissionen zu berichten, oder berichtet es freiwillig im Rahmen eines Umweltmanagementsystems darüber, so legt es die Schadstoffe, die es bei seinen eigenen Tätigkeiten in Luft, Wasser und Boden emittiert, mit der jeweiligen Menge für jeden Schadstoff offen. Sind diese Informationen bereits öffentlich zugänglich, so kann das Unternehmen alternativ auf das Dokument verweisen, in dem die Angaben gemacht werden, z. B. durch Angabe des entsprechenden URL-Links oder durch Einbettung eines Hyperlinks.	SFDR25
Umwelt	**B5 - Biologische Vielfalt** Das Unternehmen muss die Anzahl und die Fläche (in Hektar) der Grundstücke offenlegen, die es in einem oder in der Nähe eines biodiversitätsempfindlichen Gebiets besitzt, gepachtet hat oder verwaltet.	SFDR26

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[21] Verordnung (EU) 2019/2088 (SFDR), obligatorische Indikatoren Nr. 1 und Nr. 2 in Tabelle 1 von Anhang I ("Treibhausgasemissionen"; "Kohlenstoff-Fußabdruck")

[22] Verordnung (EU) 2020/1816 Benchmark-Verordnung, Artikel 5 (1), 6 und 8 (1).

[23] Diese Informationen unterstützen den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem obligatorischen Indikator in Bezug auf die wichtigsten negativen Auswirkungen abgeleitet sind, wie er in Tabelle I von Anhang I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen festgelegt ist ("Treibhausgasintensität von Unternehmen, in die investiert wird").

[24] Diese Informationen stehen im Einklang mit der Delegierten Verordnung (EU) 2020/1818 der Kommission (Klima-Benchmark-Verordnung), Artikel 8 (1).

[25] Verordnung (EU) 2019/2088 (SFDR), weil er abgeleitet ist von *(a)* einem zusätzlichen Indikator in Bezug auf die wichtigsten nachteiligen Auswirkungen, wie er in Tabelle II von Anhang I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen festgelegt ist ("Emissionen von Luftschadstoffen"); *(b)* Indikator Nr. 8 in Tabelle I von Anhang I ("Emissionen in das Wasser"); *(c)* Indikator Nr. 1 in Tabelle II von Anhang I ("Emissionen anorganischer Schadstoffe"); und *(d)* Indikator Nr. 3 in Tabelle II von Anhang I ("Emissionen ozonabbauender Stoffe").

[26] Verordnung (EU) 2019/2088 (SFDR), Pflichtindikator Nr. 7 in Tabelle 1 von Anhang I ("Aktivitäten, die sich negativ auf biodiversitätssensible Gebiete auswirken")

Umwelt	**B7 - Ressourcennutzung, Kreislaufwirtschaft und Abfallmanagement** Das Unternehmen muss offengelegt werden: (a) das gesamte jährliche Abfallaufkommen, aufgeschlüsselt nach Abfallarten (nicht gefährliche und gefährliche Abfälle);	SFDR27
Soziales	**B9 - Arbeitskräfte - Gesundheit und Sicherheit** Das Unternehmen legt die folgenden Informationen über seine ***Beschäftigten*** offen: (a) die Anzahl und Rate der ***arbeitsbedingten Aufzeichnungen*** Unfälle; und (b) die Zahl der Todesfälle infolge von arbeitsbedingten Verletzungen und arbeitsbedingten Erkrankungen.	SFDR28 Benchmark29
Soziales	**B10 - Arbeitskräfte - Entlohnung, Tarifverhandlungen und Ausbildung** Das Unternehmen muss offengelegt werden: (b) das prozentuale ***Lohngefälle*** zwischen weiblichen und männlichen ***Beschäftigten***. Das Unternehmen kann auf diese Angabe verzichten, wenn seine Mitarbeiterzahl unter 150 liegt, wobei zu beachten ist, dass dieser Schwellenwert ab dem 7. Juni 2031 auf 100 Mitarbeiter gesenkt wird;	SFDR30
Governance	**B11 - Verurteilungen und Geldstrafen wegen Korruption und Bestechung** Im Falle von Verurteilungen und Geldstrafen im Berichtszeitraum gibt das Unternehmen die Anzahl der Verurteilungen und den Gesamtbetrag der Geldstrafen für Verstöße gegen die Gesetze zur Bekämpfung von Korruption und Bestechung an.	Benchmark31

[27] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem obligatorischen Indikator in Bezug auf die wichtigsten negativen Auswirkungen abgeleitet ist, wie er in Tabelle I von Anhang I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Anlagen festgelegt ist ("Verhältnis gefährlicher Abfälle und radioaktiver Abfälle").

[28] Diese Informationen unterstützen den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie einen zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen widerspiegeln, wie in Indikator Nr. 2 in Tabelle 3 von Anhang 1 der entsprechenden delegierten Verordnung in Bezug auf die Offenlegungsvorschriften für nachhaltige Anlagen ("Unfallrate") dargelegt

[29] Benchmark-Administratoren müssen ESG-Faktoren, die der Verordnung (EU) 2020/1816 unterliegen, gemäß dem Indikator "Gewichteter durchschnittlicher Anteil von Unfällen, Verletzungen, Todesfällen" in Abschnitt 1 und 2 von Anhang 2 offenlegen.

[30] Verordnung (EU) 2019/2088 (SFDR), obligatorischer Indikator #12 in Tabelle 1 von Anhang I ("Unbereinigtes geschlechtsspezifisches Lohngefälle") und (EU) 2020/1816 Benchmark-Verordnung (EU), Indikator "Gewichteter durchschnittlicher geschlechtsspezifischer Verdienstabstand" in Abschnitt 1 und 2 von Anhang II.

[31] Benchmark-Verordnung (EU) 2020/1816, Indikator "Anzahl Verurteilungen und Höhe Geldstrafen für Verstöße gegen die Gesetze zur Korruptions- und Bestechungsbekämpfung" in Abschnitt 1 und 2 von Anhang II.

Umfassendes Modul		
Umwelt	**Berücksichtigung bei der Berichterstattung über Treibhausgasemissionen unter B3 (Basismodul)** Legt das Unternehmen bei der Berichterstattung über seine Scope-1- und Scope-2-Emissionen unternehmensspezifische Informationen über seine Scope-3-Emissionen offen, so legt es diese zusammen mit den unter B3 - Energie und Treibhausgasemissionen geforderten Informationen vor.	SFDR32 Benchmark33
Umwelt	**C3 - Ziel für die Reduzierung der Treibhausgasemissionen** Hat das Unternehmen Ziele für die Verringerung der THG-Emissionen festgelegt, so legt es seine Ziele in absoluten Werten für Scope-1- und Scope-2-Emissionen offen. Hat das Unternehmen Reduktionsziele für Scope-3-Emissionen festgelegt, so gibt es im Einklang mit den Ziffern 50 bis 53 auch Ziele für wesentliche Scope-3-Emissionen an. Insbesondere muss es Folgendes angeben: (a) das Zieljahr und den Zieljahreswert; (b) das Basisjahr und den Basisjahreswert; (c) die für die Ziele verwendeten Einheiten; (d) den Anteil von Scope 1, Scope 2 und, falls offengelegt, Scope 3, den das Ziel betrifft; und (e) eine Liste der wichtigsten Maßnahmen, die sie zur Erreichung ihrer Ziele durchführen will. Wenn das Unternehmen, das in Sektoren mit hohen Klimaauswirkungen34 tätig ist, einen Übergangsplan für den Klimaschutz verabschiedet hat, kann es Informationen darüber vorlegen, einschließlich einer Erklärung, wie es zur Verringerung der Treibhausgasemissionen beiträgt. Ist das Unternehmen in Sektoren mit starken Auswirkungen auf das Klima tätig und es nicht über einen Übergangsplan für den Klimaschutz, so gibt es an, ob und wann es einen solchen Übergangsplan annehmen wird.	SFDR35 Benchmark36 **EBA-Säule** 337 Richtwert38

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[32] Verordnung (EU) 2019/2088 (SFDR), obligatorische Indikatoren Nr. 1 und Nr. 2 in Tabelle 1 von Anhang I ("Treibhausgasemissionen"; "Kohlenstoff-Fußabdruck")

[33] Verordnung (EU) 2020/1816 Benchmark-Verordnung, Artikel 5 (1), 6 und 8 (1).

[34] Sektoren mit hoher Klimaauswirkung sind die in den NACE-Abschnitten A bis H und Abschnitt L gemäß der Definition in Anhang I der Verordnung (EG) Nr. 1893/2006 aufgeführten Sektoren.

[35] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 (SFDR) unterliegen, da sie von einem zusätzlichen Indikator abgeleitet ist, der sich auf die wichtigsten negativen Auswirkungen bezieht, wie in Indikator Nr. 4 in Tabelle II des Anhangs I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen ("Investitionen in Unternehmen ohne Initiativen zur Verringerung der Kohlenstoffemissionen") dargelegt.

[36] Diese Informationen stehen im Einklang mit der Delegierten Verordnung (EU) 2020/1818 der Kommission (Klima-Benchmark-Verordnung), Artikel 6.

[37] Diese Informationen sind mit Artikel 449a der Verordnung (EU) Nr. 575/2013 abgestimmt; Durchführungsverordnung (EU) 2022/2453 der Kommission Vorlage 3: Anlagebuch - Risiko des Übergangs zum Klimawandel: Anpassungsmetriken

[38] Diese Informationen stehen im Einklang mit der Verordnung (EU) 2021/1119 des Europäischen Parlaments und des Rates (EU-Klimagesetz), Artikel 2 (1), und der Delegierten Verordnung (EU) 2020/1818 der Kommission (Klima-Benchmark-Verordnung), Artikel 2.

Umwelt	**C4 - Klimarisiken** Wenn das Unternehmen klimabedingte Gefahren und klimabedingte Übergangsereignisse ermittelt hat, die für das Unternehmen grobe klimabedingte Risiken darstellen, muss es: (a) beschreiben Sie kurz solche klimabedingten Gefahren und klimabedingte Übergangsereignisse; (b) offenlegen, wie es die Exposition und Empfindlichkeit seiner Vermögenswerte, Tätigkeiten und Wertschöpfungskette gegenüber diesen Gefahren und Übergangsereignissen bewertet hat; (c) die Zeithorizonte der ermittelten klimabedingten Gefahren und Übergangsereignisse offenlegen und (d) offenlegen, ob es Maßnahmen zur Anpassung an den Klimawandel für alle klimabedingten Gefahren und Übergangsereignisse ergriffen hat. Das Unternehmen kann die potenziellen nachteiligen Auswirkungen von Klimarisiken, die sich kurz-, mittel- oder langfristig auf seine finanzielle Leistungsfähigkeit oder seine Geschäftstätigkeit auswirken können, offenlegen und angeben, ob es die Risiken als hoch, mittel oder gering einschätzt.	Benchmark[39] **EBA-Säule** [40]
Soziales	**C6 - Zusätzliche Informationen für die eigene Belegschaft - Menschenrechtspolitik und -verfahren** Das Unternehmen muss eine Antwort auf die folgenden Fragen geben. (a) Verfügt das Unternehmen über einen Verhaltenskodex oder eine Menschenrechtspolitik für die eigene Belegschaft? (JA/NEIN) (b) Wenn ja, deckt dies ab: i. Kinderarbeit (JA/NEIN); ii. Zwangsarbeit (JA/NEIN); iii. Menschenhandel (JA/NEIN); iv. Diskriminierung (JA/NEIN);	**Benchmark[41]** **SFDR[42]**

[39] Benchmark-Verordnung (EU) 2020/1816 Anhang II: Umweltfaktoren, die bei den zugrunde liegenden Vermögenswerten der Benchmark zu berücksichtigen sind.

[40] EBA Säule 3: ITS - Vorlage 5: Anlagebuch - Physisches Risiko des Klimawandels: Forderungen, die einem physischen Risiko unterliegen und EBA Säule 3: ITS - Vorlage 2: Anlagebuch - Übergangsrisiko Klimawandel: Durch Immobilien besicherte Kredite - Energieeffizienz der Sicherheiten.

[41] Diese Informationen unterstützen den Bedarf der Benchmark-Administratoren an der Offenlegung von ESG-Faktoren, die der Verordnung (EU) 2020/1816 unterliegen, wie im Indikator "Engagement des Benchmark-Portfolios in Unternehmen ohne Sorgfaltspflichten in Bezug auf Themen, die in den grundlegenden Übereinkommen der Internationalen Arbeitsorganisation (ILO) 1 bis 8 behandelt werden" in Abschnitt 1 und 2 von Anhang II dargelegt.

[42] Diese Information unterstützt den Informationsbedarf der Finanzmarktteilnehmer, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem obligatorischen Indikator in Bezug auf die wichtigsten nachteiligen Auswirkungen abgeleitet ist, der durch Indikator Nr. 11 in Tabelle I des Anhangs I ("Anteil der Investitionen in Unternehmen, in die investiert wird, ohne Strategien zur Überwachung der Einhaltung der UNGC-Grundsätze oder der OECD-Leitsätze für multinationale Unternehmen oder ohne Beschwerdeverfahren zur Behandlung von Verstößen gegen die UNGC-Grundsätze oder die OECD-Leitsätze für multinationale Unternehmen") und durch Indikator Nr. 5 in Tabelle III des Anhangs I ("Anteil der Investitionen in Unternehmen, in die investiert wird, ohne Beschwerdeverfahren zur Behandlung von oder der OECD-Leitsätze für multinationale Unternehmen") und durch Indikator Nr. 5 in Tabelle III von Anhang I ("Anteil der Investitionen in Unternehmen, in die investiert wird, Verfahren zur Behandlung von Beschwerden im Zusammenhang mit Arbeitnehmerangelegenheiten") und durch Indikator Nr. 9 in Tabelle III von Anhang I ("Anteil der Investitionen in Unternehmen ohne Menschenrechtspolitik") der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen.

	v. Unfallverhütung (JA/NEIN); oder vi. Sonstiges? (JA/NEIN - wenn ja, bitte angeben). Verfügt das Unternehmen über einen Beschwerdemechanismus für die eigene Belegschaft? (JA/NEIN)	
Soziales	**C7 - Schwere Menschenrechtsverletzungen** Das Unternehmen muss eine Antwort auf die folgenden Fragen geben: (a) Hat das Unternehmen bestätigte Vorfälle in der eigenen Belegschaft im Zusammenhang mit: i. Kinderarbeit (JA/NEIN); ii. Zwangsarbeit (JA/NEIN); iii. Menschenhandel (JA/NEIN); iv. Diskriminierung (JA/NEIN); oder v. Sonstiges? (JA/NEIN - wenn ja, bitte angeben). (b) Falls ja, kann das Unternehmen die Maßnahmen beschreiben, die zur Behebung der oben beschriebenen Vorfälle ergriffen wurden. Sind dem Unternehmen bestätigte Vorfälle bekannt, in die Arbeiter in der Wertschöpfungskette, betroffene Gemeinden, Verbraucher und Endverbraucher verwickelt sind? Wenn ja, bitte angeben.	SFDR43 Richtwert44
Governance	**C8 - Einnahmen aus bestimmten Sektoren und Ausschluss von den EU-Referenzbenchmarks** Ist das Unternehmen in einem oder mehreren der folgenden Sektoren tätig, so sind die entsprechenden Einnahmen in dem/den Sektor(en) anzugeben: (a) umstrittene Waffen (Antipersonenminen, Streumunition, chemische Waffen und biologische Waffen);	SFDR45 Richtwert46

[43] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem obligatorischen und zusätzlichen Indikator abgeleitet ist, der sich auf die wichtigsten negativen Auswirkungen bezieht, wie sie in Indikator Nr. 10 in Tabelle I von Anhang I und in Indikator Nr. 14 in Tabelle III von Anhang I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen festgelegt sind ("Verstöße gegen die UNGC-Grundsätze und die OECD-Leitsätze für multinationale Unternehmen" und "Anzahl der festgestellten Fälle von schwerwiegenden Menschenrechtsverletzungen und -vorfällen")

[44] Diese Informationen unterstützen den Informationsbedarf der Benchmark-Administratoren bei der Offenlegung von ESG-Faktoren, die der Verordnung (EU) 2020/1816 unterliegen, wie im Indikator "Anzahl der Benchmark-Konstituenten, die sozialen Verstößen unterliegen (absolute Zahl und relativer Anteil an allen Benchmark-Konstituenten), gemäß internationalen Verträgen und Übereinkommen, Grundsätzen der Vereinten Nationen und gegebenenfalls nationalem Recht" in Abschnitt 1 und 2 von Anhang II dargelegt.

[45] Diese Informationen unterstützen den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator für die wichtigsten negativen Auswirkungen abgeleitet sind, der in Tabelle I des Anhangs I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Anlagen festgelegt ist ("Exposition gegenüber kontroversen Waffen (Antipersonenminen, Streumunition, chemische und biologische Waffen)").

[46] Benchmark-Verordnung (EU) 2020/1818 Artikel 12(1): "Administratoren von Benchmarks, die auf der Grundlage des Pariser Abkommens erstellt wurden, schließen alle folgenden Unternehmen von diesen Benchmarks aus: Unternehmen, die an Tätigkeiten im Zusammenhang mit umstrittenen Waffen beteiligt sind;" und Benchmark-Verordnung (EU) 2020/1816 Anhang II: Gewichteter durchschnittlicher Prozentsatz der Benchmark-Bestandteile im Bereich umstrittener Waffen."

	(b) den Anbau und die Erzeugung von Tabak;	**EBA-Säule** [347] Richtwert48
	(c) Sektor der fossilen Brennstoffe (Kohle, Öl und Gas) (d. h. das Unternehmen erzielt Einkünfte aus der Exploration, dem Abbau, der Förderung, der Produktion, der Verarbeitung, der Lagerung, der Raffination oder dem Vertrieb, einschließlich des Transports, der Lagerung und des Handels, von fossilen Brennstoffen gemäß der Definition in Artikel 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates17), einschließlich einer Aufschlüsselung der Einkünfte aus Kohle, Öl und Gas); oder	SFDR49 **EBA-Säule** [350] **Benchmark**[51]
	(d) die Herstellung von Chemikalien, wenn es sich bei dem Unternehmen um einen Hersteller von Pestiziden und anderen agrochemischen Produkten handelt.	SFDR52 **EBA-Säule** [353]
	Das Unternehmen legt offen, ob es von EU-Referenzbenchmarks ausgeschlossen ist, die an das Pariser Abkommen angepasst sind, wie in Absatz 241 der Leitlinien beschrieben.	**EBA-Säule** [354] Benchmark55

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[47] EBA Säule 3: Vorlage 1: Anlagebuch - Übergangsrisiko Klimawandel: Unternehmen, die Tabakerzeugnisse herstellen, die gemäß Artikel 12 Absatz 1 Buchstaben d bis g und Artikel 12 Absatz 2 der Verordnung über die Benchmark-Standards für das Klima von den an das EU-Parlament angepassten Benchmarks ausgeschlossen sind

[48] Diese Informationen unterstützen den Bedarf der Benchmark-Administratoren an der Offenlegung von ESG-Faktoren, die der Verordnung (EU) 2020/1818 gemäß Artikel 12 Absatz 1 Buchstabe b und der Benchmark-Verordnung (EU) 2020/1816 Anhang II: "Gewichteter durchschnittlicher Prozentsatz der Benchmark-Konstituenten im Tabaksektor" unterliegen.

[49] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen abgeleitet ist, der in Tabelle I von Anhang I Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Anlagen festgelegt ist ("Exposure to companies active in the fossil fuel sector")

[50] EBA Säule 3: Vorlage 1: Anlagebuch - Übergangsrisiko Klimawandel: Unternehmen im Bergbau und in der Gewinnung von Steinen und Erden, die gemäß Artikel 12 Absatz 1 d bis g und gemäß Artikel 12 Absatz 2 der Verordnung über Benchmark-Standards für das Klima von den an das EU-Parlament angepassten Benchmarks ausgeschlossen sind

[51] Benchmark-Verordnung (EU) 2020/1818 Artikel 12(1).

[52] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen abgeleitet ist, der als Indikator Nr. 9 in Tabelle II von Anhang I der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen ("Investitionen in Unternehmen, die Chemikalien herstellen") festgelegt ist.

[53] EBA Säule 3: Vorlage 1: Anlagebuch - Übergangsrisiko Klimawandel: Unternehmen im Bergbau und in der Gewinnung von Steinen und Erden, die gemäß Artikel 12 Absatz 1 d bis g und gemäß Artikel 12 Absatz 2 der Verordnung über Benchmark-Standards für das Klima von den an das EU-Parlament angepassten Benchmarks ausgeschlossen sind

[54] Diese Offenlegungspflicht steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission - Vorlage 1 - Übergangsrisiko Klimawandel.

[55] Diese Offenlegungspflicht steht im Einklang mit der Delegierten Verordnung (EU) 2020/1818 der Kommission (Klima-Benchmark-Verordnung), Artikel 12 Absatz 1.

Governance	**C9 - Geschlechtervielfalt im Leitungsorgan** Verfügt das Unternehmen ein Leitungsorgan, so legt es den entsprechenden Anteil der Geschlechtervielfalt offen.	SFDR56 Benchmark57

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[56] Diese Information unterstützt den Informationsbedarf von Finanzmarktteilnehmern, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen abgeleitet ist, der als Indikator Nr. 13 in Tabelle I des Anhangs I der Delegierten Verordnung (EU) 2022/1288 der Kommission vom 6. April 2022 zur Ergänzung der Verordnung (EU) 2019/2088 des Europäischen Parlaments und des Rates in Bezug auf die Offenlegungsvorschriften für nachhaltige Investitionen ("Geschlechtervielfalt im Vorstand") aufgeführt ist.

[57] Diese Informationen unterstützen den Informationsbedarf der Benchmark-Administratoren für die Offenlegung von ESG-Faktoren, die Delegierten Verordnung (EU) 2020/1816 der Kommission vom 17. Juli 2020 zur Ergänzung der Verordnung (EU) 2016/1011 des Europäischen Parlaments und des Rates unterliegen, wie im Indikator "Gewichteter durchschnittlicher Anteil weiblicher und männlicher Mitglieder des Leitungsorgans" in Abschnitt 1 und 2 von Anhang II dargelegt.

EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

Basis for Conclusions

December 2024

Stand: 01.02.2026

„VSME – Basis for Conclusions“
EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME), Basis for Conclusions, December 2024 (323 Seiten, pdf)

https://api.knowledgehub.efrag.org/dev-doc-attachment/vsme-basis-for-conclusions.pdf

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EFRAG
sustainability reporting

EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

Stand: 01.02.2026

Basis for Conclusions

December 2024



DISCLAIMER

Disclaimer

This Basis for Conclusions accompanies but is not part of the Voluntary standard for non-listed micro-, small- and medium-sized undertakings (VSME). It summarises the considerations of the EFRAG SR TEG and SRB used in developing the proposed contents of the Standard.

About EFRAG

EFRAG's mission is to serve the European public interest in both financial and sustainability reporting by developing and promoting European views in the field of corporate reporting. EFRAG builds on and contributes to the progress in corporate reporting. In its sustainability reporting activities, EFRAG provides technical advice to the European Commission in the form of draft European Sustainability Reporting Standards (ESRS) elaborated under a robust due process and supports the effective implementation of ESRS. EFRAG seeks input from all stakeholders and obtains evidence about specific European circumstances throughout the standard setting process. Its legitimacy is built on excellence, transparency, governance, due process, public accountability and thought leadership. This enables EFRAG to speak convincingly, clearly, and consistently, and be recognised as the European voice in corporate reporting and a contributor to global progress in corporate reporting.

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Introduction and key steps of EFRAG due process

BC1. The objective of this document is to illustrate the basis for conclusions and describe the process followed in defining the EFRAG Voluntary Standard for non-listed micro-, small-, medium-undertakings ('the VSME'). In this document 'non-listed SMEs' is used to identify the undertakings in the scope of the VSME, including micro-undertakings[1]. This includes the methodological approach taken, the main content of the Standard and the key aspects discussed by the EFRAG Sustainability Reporting Board ('SRB') and the EFRAG Sustainability Reporting Technical Expert Group ('SR TEG'), as a result of the public consultation and field test.

BC2. EFRAG's work on such a voluntary Standard for non-listed SMEs falls outside the Corporate Sustainability Reporting Directive ('CSRD'). It stems from the market's need to have a common point of reference to be used by SMEs to face growing sustainability data requests from business partners and lowering entry barriers to sustainability reporting by non-listed SMEs.

BC3. The primary ambition is for the VSME to become the basis for lenders, investors and corporate counterparts in the value chain when they define their ESG data requests for SMEs. In concrete terms this means that, based on market acceptance, the VSME is expected to limit *de facto* current multiple ESG data requests (a significant cost of preparation for SMEs) by replacing the various uncoordinated ESG questionnaires.

BC4. The purpose of the VSME is to support SMEs in:

(a) providing information that will help satisfy the data needs of large undertakings requesting sustainability information from their suppliers;

(b) providing information that will help satisfy data needs from lenders/credit providers and investors, to improve SMEs' access to finance;

(c) improving the management of their sustainability issues. This will support their competitive growth and enhance their resilience in the short-, medium-, and long-term, and the VSME can be used as an internal management tool; and

(d) contributing to a more sustainable and inclusive economy.

BC5. Hence, a fundamental aspect of the VSME is its market acceptance:

(a) on the user's side, acceptance by business partners, i.e. lenders, investors, and corporate clients as well as heads of supply chains, to replace their multiple questionnaires and use instead the VSME to gather sustainability data from SMEs. Those data requests fulfil the needs under their ESRS reporting obligations or managing sustainability risks in investment portfolios or in the supply chain; and

(b) on the preparers side, SMEs (as well as small- and medium-sized practitioners as proxies of SMEs) accepting the VSME as a reporting tool to start their sustainability journey and monitor sustainability performance while also responding to growing requests of sustainability data from business partners.

BC6. The public consultation and field test allowed for the identification of important conditions to facilitate broad market acceptance. These include:

(a) the availability of online platforms that work at the same time as template and data repositories, making the reported information available to multiple existing and potential business partners;

(b) the availability of free or affordable online tools supporting the preparation of the disclosures (e.g. GHG calculator).

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[1] Micro undertaking if it does not exceed two of the following thresholds: €450,000 in balance sheet total, €900,000 in net turnover, or an average of 10 employees.

Small undertaking if it does not exceed two of the following thresholds: €5 million in balance sheet total, €10 million in net turnover, or an average of 50 employees.

Medium undertaking if it does not exceed two of the following thresholds: €25 million in balance sheet total, €50 million in net turnover, or an average of 250 employees.

BC7. The VSME is a deliverable of the European Commission SMEs Relief Package (September 2023). The European Commission tasked EFRAG to develop a simple and standardised framework for SMEs to report on ESG issues, creating better opportunities to obtain green financing and thus facilitating the transition to a sustainable economy. In particular, in Action 14 of the SMEs Relief Package it is mentioned that the '*Commission will ensure that SMEs have a simple and standardized framework to report on ESG issues … ensuring the rapid delivery of voluntary standards for non-listed SMEs.'*

BC8. In addition, the European Commission's 'Questions and Answers on the Adoption of European Sustainability Reporting Standards' that accompanies the adoption of the ESRS' Delegated Acts in July 2023 (Commission Delegated Regulation (EU) 2023/2772 - hereafter also referred to as 'ESRS Set 1'), contains specific text about non-listed SMEs that can be summarised as follows:

(a) Some non-listed SMEs which are not subject to any sustainability reporting requirements under the Accounting Directive (Directive 2013/34/EU) as amended by the CSRD may nevertheless receive requests for sustainability information from customers, banks, investors or other stakeholders. 'EFRAG is therefore also developing simpler, voluntary standards for use by non-listed SMEs. These voluntary standards should enable non-listed SMEs to respond to requests for sustainability information in an efficient and proportionate manner and so to facilitate their participation in the transition to a sustainable economy.'

BC9. Reflecting the above, the logic followed in the standard setting has been primarily to prioritise the identification of a proportionate set of indicators as a credible replacement for at least a substantial component of the questionnaires currently used. At the same time, the standard supports a complete picture of the ESG impacts that would inform stakeholders other than lenders, investors and corporate clients in keeping SMEs accountable for impacts is not the focus of this Standard.

EFRAG SRB approval (13 November 2024)

BC10. The EFRAG SRB approved VSME on 13 November 2024. The following SRB members supported the standard: Salvador Marin, Ruben Zandvliet, Thomas Roulland, Laurence Rivat, Roderik Meeder, Mariyan Nikolov, Maria Dolores Urrea Sandoval, Marcello Bianchi, Kristian Koktvedgaard, Kerstin Lopatta, Filip Gregor, Grégoire de Montchalin, Charlotte Söderlund, Luc Vansteenkiste, Monika Brom, Simon Braaskma, Begona Giner, Wim Bartels, Patrick de Cambourg, Isabelle Schoemann, Alex Bassen.

BC11. While approving the overall Standard, four of them (Alexander Bassen, Marcello Bianchi, Monika Brom, Simon Braaksma) expressed reservations on the following specific aspects of it:

(a) the Basic Module is in general too complex for micro-undertakings which should be allowed to use a pre-defined sub-set of disclosures of that module (a simplified Basic Module) in order to not discourage them to use the Standard;

(b) the Basic Module should be targeted also to small companies;

(c) some of the disclosure requirements included both in the Basic and in the Comprehensive Modules are still too complex and granular for SMEs, as clearly emerged from the field test (B3, B7 were considered 'highly difficult' by around 1/3 of responses and 'medium difficult' by around another 30% of responses). Even higher difficulty has been pointed out regarding C3 and C4. An additional field test to assess the feasibility of the current version of the VSME Standard would be useful;

(d) *Appendix B (list of sustainability issues)* should be simplified;

(e) to avoid double reporting, it should be possible to integrate VSME information/requirements into other reports, such as EMAS or GRI; they fear in particular that the adoption of the VSME could result in the discontinuation of these reports.

BC12. Cristina Saporetti (representative of Business Europe) abstained as the final version will still impose significant costs on smaller companies for understanding all the requirement and terminology. She pointed in particular to the geolocalisation and the environmental requirements, with the latter emerging as challenging in the field test (the SRB member did not specify which ones in particular).

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BC13. The EFRAG SRB agreed to modify the following content in the VSME version approved by EFRAG SR TEG. While keeping unchanged the substance of the requirements, the EFRAG SRB intended to simplify further the narrative components of the Basic Module. In particular, the EFRAG SRB agreed to move the description of the practices, policies and future initiatives in the Comprehensive Module. In addition, the EFRAG SRB agreed to move from the Basic Module to the Comprehensive Module the description of the undertaking's strategy, business model and sustainability-related initiatives. The markup of these paragraphs is presented in Annex 9.

BC14. The EFRAG SRB considered the activities undertaken by the EFRAG Secretariat, including the supplementary workshops on the revised VSME in September 2024, as well as the evidence from the consultation and the field test. They concluded that a re-exposure of the final VSME would have not revealed substantially new elements on the concerns of stakeholders. For this reason, following EFRAG due process procedures, they concluded that a re-exposure was not needed.

EFRAG SR TEG approval (22 October 2024)

BC15. On 22 October EFRAG SR TEG approved the VSME. The following 20 SR TEG members approved the standard: Piermario Barzaghi, Kati Beiersdorf, Belen Varela, Carlota de Paula Coelho, Chiara Del Prete, Eric Duvaud, Jose Moneva, Julia Kölzer, Olivier Scherer, Per Anders Öjar Törnqvist, Piotr Biernacki, Signe Lysgaard, Sigurt Vitols, Luc Hendrickx, Anne-Claire Ducrocq, Sandra Atler, Robert Adamczyk, Christoph Toepfer, Philippe Diaz and Jean-Francois Coppenolle. One SR TEG member (Luca Bonaccorsi) abstained.

BC16. While approving the Standard:

(a) Luc Hendrickx expressed reservations on the inclusion of Disclosure C9 – Gender Diversity in Governance Body because of legal reasons, as there is no legal binding requirement in the sustainability reporting legislation to ask for this kind of information from SMEs. In addition, Directive (EU) 2022/2381 on improving gender balance among directors of listed companies exempts SMEs from its scope; and

(b) Signe Lysgaard, Sandra Atler and Sigurt Vitols expressed reservations on the 'may instead of shall' datapoint on non-employees in C5 – Additional (general) workforce characteristics, and on the own workforce specification in C6 – Human rights policies and processes.

Meetings since the end of the public consultation (From May to November 2024)

BC17. Following the end of the public consultation (May 2024), the EFRAG Secretariat discussed the results with both SR TEG and the SRB in July. During these discussions, SR TEG and the SRB approved strategic orientations to be implemented based on the proposals presented by the EFRAG Secretariat.

BC18. Following discussions with SR TEG and the SRB in July, the EFRAG Secretariat modified the draft VSME Standard accordingly and during a series of SR TEG discussions in September and October, it reviewed these changes with SR TEG. Furthermore, the EFRAG Secretariat held two additional meetings with preparer and user associations to ensure coherency between public consultation results and the opinions of preparer and user associations. The dates of all these meetings are mentioned in Annex 3.

EFRAG's due process from design to approval of the VSME ED (From November 2022 to November 2023)

BC19. The VSME ED was discussed for the first time by SR TEG on 17 November 2022. The EFRAG SRB on 27 January 2023 discussed the need to develop a single standard for all SMEs or two separate standards and concluded on developing two as follows:

(a) ESRS for listed SMEs (identified in this document as ESRS LSME or LSME[2]), which is legally binding, according to the CSRD Art. 19 (a) (6); and

(b) VSME (i.e. a voluntary sustainability reporting standard for non-listed SMEs).

[2] At the date of the issuance of VSME, EFRAG has not finalise its advice on LSME.

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BC20. The EFRAG SRB consensually agreed to instruct SR TEG to:

(a) start with the ESRS LSME;

(b) not overdo the ESRS LSME (i.e. proportionality) but remain within the remit of the CSRD's constraints;

(c) once the ESRS LSME's basis is stabilised, consider the VSME (including the PTF draft[3]) from the perspective of consistency and proportionality;

(d) consider merging the ESRS LSME and the VSME if it appears relevant; and

(e) take into account that the requirements for both listed and non-listed SMEs should be available at the same time.

BC21. With reference to point (d), the technical activities leading to the drafting of the two Standards after this meeting showed that the differences in purpose and perimeter of application of the two respective Standards require different approaches. Merging the two Standards would have failed to meet the different needs of the respective constituencies.

BC22. Following the nine meetings of EFRAG SR TEG and eight EFRAG SRB meetings as illustrated in Annex 3, the VSME ED was approved by EFRAG SR TEG on 8 November 2023 on a consensus basis, with 23 SR TEG members[4] recommending the issuance of the ED for public consultation. On 29 November 2023, 21 EFRAG SRB members[5] approved the ED on a consensus basis for public consultation, with a number of changes being compared with the text approved by EFRAG SR TEG.

BC23. In addition to being discussed by EFRAG SR TEG and the SRB, the VSME ED was also discussed intensively with stakeholders at: (i) several meetings of the EFRAG SME Expert Working Group, (ii) workshops with the EFRAG VSME community, and (iii) workshops with representatives of SMEs, banks and large corporates held between December 2022 and November 2023 (Annex 4).

Key messages from the public consultation and how they have been addressed

BC24. The VSME Exposure Draft is included in Annex 1 of this document.

BC25. Following the approval at the EFRAG SRB meeting on 29 November 2023, the VSME ED was published for public consultation for four months from 22 January 2024 until 21 May 2024. The EFRAG Secretariat received comments from 311 respondents from the online survey (126 preparers, 39 users and 146 other respondents) and from 164 participants in the field tests (135 preparers and 29 users). The EFRAG Secretariat also received 22 comment letters on top of the online survey respondents. Platforms that currently work as data aggregators were involved as a proxy for preparers, and users represented 23,000 SMEs across Europe and over 100,000 large undertakings worldwide. In parallel to the public consultation, EFRAG has also run a total of 11 field test workshops. The field test included preparers preparing their sustainability report based on the VSME ED. Supplementary workshops were also held in September 2024 to collect reactions on a revised VSME draft, prepared to reflect the consultation feedback.

BC26. The following paragraphs illustrate the key messages gathered from the public consultation and field test, as well as how they have been integrated in the final VSME.

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[3] Proposal by former EFRAG Project Task Force ESRS (PTF-ESRS), cluster 8 (Issue Paper 03-0, Appendix 1 of SR TEG meeting of 17 November 2022).

[4] While voting in support of the ED, Luc Hendrickx qualified his vote, expressing disagreement on the inclusion of the following disclosures: i) convictions and fines, ii) definition of accidents in B 9 and iii) diversity of the board members in BP 2. He also expressed reservations on the usefulness and benefits of the Business Partner module. Despite these reservations, he supported issuing the ED in its current version for consultation.

[5] The EFRAG SRB member Annina Tanhuanpää, representing the banking sector, expressed reservations regarding the current proposed standards as the ED VSME may not be sufficiently simplified, potentially imposing an undue costs of preparation on SMEs. She also noted the reservations expressed by SME representatives in the EFRAG SR TEG on the usefulness and benefits of the Business Partner module. She agreed to issue the ED for consultation, expecting that the consultation would help address these concerns.

BC27. *Request for an online tool and a VSME ecosystem*. A clear request stemmed from both prepares and users, on the need to have an online platform and additional online tools to simplify and guide the reporting process for SMEs. This message was pervasive in online survey, field tests and comment letters.

(a) Stakeholders suggested that the VSME be made available as an online reporting template, to facilitate the exchange of information between preparers and business counterparts. This would unlock the full benefits for value chain participation. The availability of a central repository (inspired by the existing platforms) where SMEs, banks and other counterparties (heads of supply chains) can populate online templates and have access to the data is essential in order to achieve the expected benefits. The questionnaires would be replaced by the downloading of data from this source. This was also an important message of the Cost Benefit Analysis on the VSME ED.

(b) Stakeholders suggested developing online tools (calculators, databases) accessible to SMEs when preparing the information, thus reducing the technical complexity and the need for specialised skills. While EFRAG can partially work on certain elements of guidance and stimulate the availability of such online tools, it will not develop them. In particular, the development of online platforms and tools (i.e. GHG calculators, geolocation tools) is considered by stakeholders an essential element to facilitate the reporting as well as the comparability of information.

BC28. In addition, several stakeholders requested adding VSME supporting guides in addition to the VSME. This is an area where EFRAG plans to be active in the future, resources permitting, and developing synergies with the current EFRAG workplan (e.g. on sector guidance). Not all items in this list will be covered by EFRAG; however, EFRAG will endeavour to stimulate the development of some of these elements by other stakeholders. The following areas have been identified by those stakeholders:

(a) Templates of the VSME report and mock up disclosure;

(b) Guidelines to simplify actions/policies in relation to the possible sustainability issues to be used as a scrolling menu from the VSME online template under the Basic and Comprehensive Modules;

(c) Examples of climate change actions or transition plans for SMEs;

(d) Examples of impacts on workers in the value chain and affected communities for SMEs;

(e) Guidance linking the VSME and ISO-CEN CENELEC standards; Map ISO 14001 to the VSME;

(f) VSME Pollution Guidance.

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BC29. *Deletion of the Narrative-Policies, Actions and Targets (PAT) module.* The public consultation, field tests, and comment letters, all underlined the complexity of this module (for both prepares and users), who both requested for substantial simplifications. In particular, **SME business associations** in the public consultation indicated a preference for prioritising the Basic Module and BP Module over the Narrative PAT Module. SME associations considered materiality and PAT as over-demanding and suggested deleting or postponing the module. Disclosures N2, N3, and N4 were considered complex by **SME business associations.** The comments included: i) the complexity of the materiality process and selection/engagement with stakeholders; ii) the need for guidance, examples, templates and tools to help SMEs; (iii) since the materiality process is a considerable cost of preparation for SMEs, they suggested using sector-guidance instead of closed-ended questions. Similar comments were reiterated in the comment letters by a variety of respondent categories. Some preparers asked to remove this module from the VSME. Similar views were also voiced through the field tests. The field tests also indicated that for preparers, this module presents some operational challenges, with materiality being the largest challenge. Overall, disclosures N2 and N3 were perceived to be of great difficulty. The main reason is that SMEs tend to be less equipped and would need the help of consultants. N1 and N4, appeared to be disclosures of low difficulty, similarly to N5. With regard to **users (banking associations and large undertakings)**, concerns were raised regarding disclosures N2 ('Material sustainability matters'), and N4 ('Key stakeholders'). Many public consultation user respondents found the narrative nature of this module problematic, as it made it difficult to obtain necessary reliable and comparable information used for reporting and making comparisons across respondents over time; they considered a more quantitative approach as preferrable (e.g. moving to a checklist of 'yes/no' questions). For N3 ('Management of material sustainability matters') banking associations proposed a specific reformulation of it into a semi-narrative disclosure. On the other hand, N1 ('Strategy: business model and sustainability') and N4 appeared to have lower relevance compared to N5 for field- test users. For all these reasons, the Narrative-PAT module was deleted and disclosures N1, N3 and N5 ('Governance: responsibilities in relation to sustainability matters') were reallocated to the Basic and Comprehensive Modules in a simplified semi-narrative format.

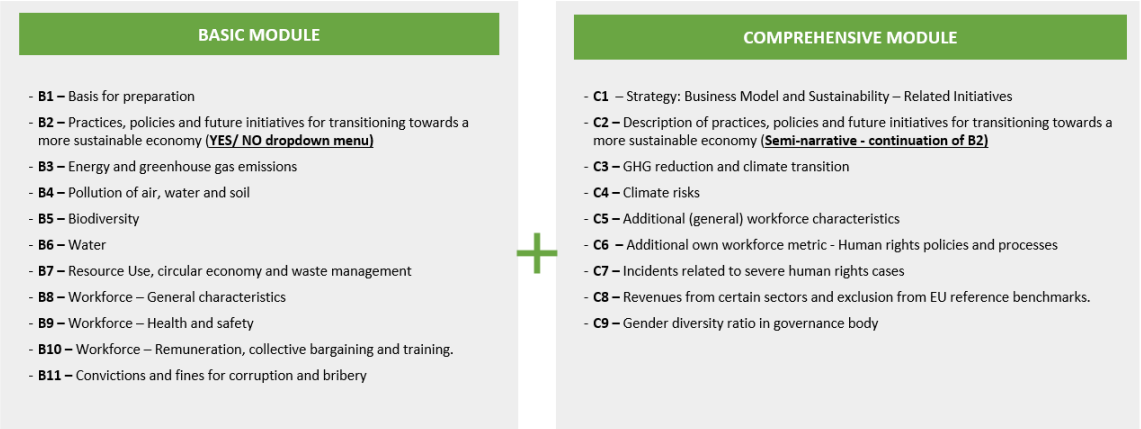
BC30. *Removal of the materiality analysis from the VSME*. The most recurring comments indicated the following concerns: (i) the materiality analysis and the list of material matters are considered too complex; (ii) there is a need for guidance, examples, charts, templates and tools to help SMEs; (iii) the materiality analysis is useful but heavy for SMEs, as it is time consuming and very costly; and (iv) there is a suggestion to use pre-defined sector-guidance materiality instead. Preparers indicated challenges in terms of implementation and cost. Other stakeholders had also expressed concerns on materiality. As for in the field test, both preparers and users expressed concerns about materiality. Banks/investors highlighted concerns associated with the materiality analysis, acknowledging the complexity of this analysis for SMEs, hence questioning the reliability of the results. As such, they indicated a general preference for replacing the materiality analysis with a pre-defined list of sustainability matters by sector. The complexity of the materiality principle was further confirmed by the CBA analysis. Business association preparers indicated that materiality remains difficult. Based on these elements, the materiality analysis has been deleted from the entire Standard. In the Comprehensive Module (previously named Business Partners Module), materiality has been replaced wherever possible by an 'if applicable' principle (refer to BC 76), as already used in the Basic Module.

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BC31. *Additional disclosures required by financial institutions and not included in the VSME*. During the public consultation, banks identified a list of additional datapoints. In July 2024, the EFRAG SRB agreed to tentatively explore adding those disclosures in a new advanced module called the Additional Financial Institutions (AFI) module subject to the EFRAG Secretariat's testing of the relevance of the new module with banks. In September 2024, the EFRAG Secretariat organised a workshop with the banking associations that participated in the public consultation (European and national associations). The outcome was that four datapoints were confirmed as needed by banking associations: 1) radioactive waste, 2) the female to male ratio at management level, 3) exclusion from EU reference benchmarks, and 4) GHG intensity. These datapoints were ultimately reallocated to the Basic and Comprehensive Modules, as they supplemented existing disclosures in those two modules. In addition, four other datapoints suggested by some of the banking respondents during the public consultation were ultimately deemed not necessary by the majority of the banking associations in the workshop. As a result, EFRAG SR TEG and the SRB decided to not include these datapoints: 1) energy production, 2) emissions of the vehicle fleet, 3) number of employees with disabilities (protected categories), and 4) water intensity. Finally, during the public consultation, the Platform on Sustainable Finance noted its ongoing work to develop a streamlined EU Taxonomy for non-listed SMEs and recommended the inclusion of a placeholder in VSME. This would create a link and offer in VSME a single point of entry for all the sustainability related data requests, including those stemming from this future streamlined EU Taxonomy. EFRAG SR TEG and the SRB supported adding this placeholder as a possible content of the AFI Module. At the date of approval and of issuance of VSME, the streamlined EU taxonomy has not yet been finalised. Pending clarity on its content, the placeholder has been removed from VSME. The accompanying letter to the VSME suggests to the EC that the placeholder or link to the EU simplified taxonomy SME tool be eventually inserted in the Standard once the content of the simplified taxonomy itself is finalised by the Platform on Sustainable Finance.

BC32. Hence the AFI module was considered no longer needed and deleted entirely.

BC33. *The final modular structure of the VSME*. The following diagram shows the overall structural changes that have been made to the VSME following the public consultation, including the additional datapoints suggested by banks during the public consultation:



BC34. Public consultation results by disclosure have been integrated in detail in the text below (refer to disclosures BC88 to BC194, which are related to disclosures B1 to C9).

Cost Benefit analysis

BC35. The key takeaway from the CBA results on the VSME, following the revisions undertaken as a result of the public consultation is a reduction of reporting costs for preparers compared to the VSME ED. This is because of the following changes that have been implemented on the revised VSME:

(a) changes to the module structure;

(b) streamlining, removing of narrative disclosures, and elimination of references to international guidelines;

(c) removal of the materiality analysis;

(d) inclusion of additional data points to account for requests from financial institutions.

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(e) sensitivity analysis on analytical parameters suggesting that net impacts are neutral to positive following the first year of implementation; and

(f) in the central scenario, net impacts becoming positive from the third year of implementation of the VSME.

BC36. On the basis of the public consultation, the field-test results and preliminary cost-benefit analysis, in July 2024 the EFRAG SRB and SR TEG agreed on the orientations both at structural (as described above) and disclosure level of metrics, as described in the sections for the Basic and Comprehensive Modules below. The EFRAG Secretariat implemented the agreed changes in the revised VSME after the public consultation that was discussed as follows: six meetings of the SR TEG between September and October 2024 and three meetings of the SRB between October and November 2024. The specific list of meetings along with the specific discussions, is listed in Annex 3. The revised VSME after the public consultation was also discussed in the workshops with preparers and users, i.e. with European and national banking associations (16 September 2024) and with European and national SMEs' representatives (23 September 2024). The outcomes of the workshops has been an integral part of EFRAG SRB's redeliberation and due process and, as such, they are published in Annex 16.

Scope of the VSME

BC37. Paragraph 2 of the VSME explains that this is a voluntary Standard and applies to undertakings whose securities are not admitted to trading on a regulated market in the European Union (i.e. non-listed). Article 3 of Directive 2013/34/EU (the Accounting Directive) defines and distinguishes three categories of small and medium-sized undertakings based on their balance sheet total, net turnover and average number of employees during the financial year, as follows:

(a) micro if it does not exceed two of the following thresholds: €450,000 in balance sheet total, €900,000 in net turnover, or an average of 10 employees;

(b) small if it does not exceed two of the following thresholds: €5 million in balance sheet total, €10 million in net turnover, or an average of 50 employees.

(c) medium if it does not exceed two of the following thresholds: €25 million in balance sheet total, €50 million in net turnover, or an average of 250 employees.

BC38. The balance sheet and net revenue criteria indicated above have been adjusted by the EC's Delegated Act amending Directive 2013/34/EU as regards the adjustments of the size criteria for micro-, small-, medium-sized with implementation as of January 2024 (and reporting 2025). Hence the text in paragraph 2 of this Standard has been adjusted accordingly. Additionally, based on Article 3, paragraph 10 of the [Directive 2013/34/EU (the accounting directive)], if an undertaking exceeds two of the three criteria for medium-sized undertakings set out in BC37, for two consecutive financial years, it shall then and only then be considered a large undertaking. The same applies conversely: if a large undertaking falls within the criteria set out in BC37 for two consecutive financial years, it shall then be considered an SME.

BC39. Micro, small and medium companies (as defined above) are the vast majority of companies in Europe. They are in total 25.8[6] million with the following breakdown:

(a) micro = 24.0 million companies (93.3% of total EU companies)

(b) small = 1.5 million companies (5.7% of total EU companies)

(c) medium = 206.400 companies (0.8% of total EU companies).

BC40. In this document 'non-listed SMEs' is used to identify the undertakings in the scope of the VSME, including micro-undertakings.

Useful references in the CSRD

BC41. The following references in the CSRD provide background:

[6] Annual Report on European SMEs 2023/2024 published by the European Commission. (Katsinis, A., Lagüera-González, J., Di Bella, L., Odenthal, L., Hell, M., Lozar, B., Annual Report on European SMEs 2023/2024, Publications Office of the European Union, Luxemburg, 2024, doi:10.2826/355464)

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(a) **Art 29b4** indicates that standards for listed SMEs, small non-complex banks and captive (re)insurances (ESRS LSME) will legally cap the information which ESRS can require large undertakings to obtain from SMEs in their value chains;

(b) **Recital 21** indicates that small and medium-sized undertakings that are not listed on a regulated market in the Union should also have the possibility of choosing to use the simplified ESRS LSME on a voluntary basis.

(c) **Recital 21** also indicates that such standard will therefore help to protect and enhance the access of smaller undertakings whose securities are admitted to trading on a regulated market in the Union to financial capital and avoid discrimination against such undertakings on the part of financial market participants;

(d) **Recital 22** says that Member States should be free to assess the impact of their national transposition measures on small and medium-sized undertakings, to ensure that they are not disproportionately affected, with specific attention to be given to micro-undertakings and to avoid an unnecessary administrative preparatory cost. Member States *should consider introducing measures to support small and medium-sized undertakings in applying the sustainability reporting standards*.

BC42. With reference to Art. 29(b)(4) above, the VSME does not have a legal role in setting the cap under the CSRD, according to the interpretation of the CSRD as confirmed to EFRAG by the representatives of the European Commission who are observers in EFRAG's due process procedure. The VSME is expected to form the basis for lenders, investors and corporate clients of non-listed SMEs, when defining sustainability data requests for SMEs. Assuming that the VSME can replace a substantial part of existing ESG data requests for SMEs, the Standard is expected to set a de facto limit to the current multiple ESG data requests that SMEs are facing. Current EFRAG considerations are detailed in the section on trickle-down effects in Annex 8.

One or two different reporting standards for SMEs

BC43. With reference to Recital 21 above, EFRAG considered whether the non-listed SME should also apply the ESRS LSME, resulting in a single standard for SMEs.

BC44. EFRAG was requested by several stakeholders to develop a separate standard consisting of minimum voluntary disclosures adapted to the characteristics and capacities of non-listed SMEs, because a standard for listed SMEs would be too complex to apply for them.

BC45. In particular, the outreach conducted with the banking sector reflected the need to cover micro undertakings in the scope of the VSME. EFRAG SR TEG and the SRB considered that the level of simplification and proportionality of a voluntary standard suited for use by micro and small undertakings would be irreconcilable with the minimum disclosures needed by investors and covered in the ESRS LSME. The aim is to avoid discrimination against listed SMEs on the part of financial market participants (see Recital 21 indicates that small and medium-sized undertakings that are not listed on a regulated market in the Union should also have the possibility of choosing to use the simplified ESRS LSME on a voluntary basis.).

Simplified language and consistency with ESRS Set 1

BC46. Paragraphs 3 and 4 of the VSME explain that consistency with the European Sustainability Reporting Standards ('ESRS') for large undertakings has been carefully considered. EFRAG has sought to pursue a consistent set of standards belonging to the ESRS literature. This will facilitate the understanding of the requirements by users and preparers. The same list of sustainability matters (Appendix B of the VSME which replicates AR 16 in ESRS Set 1) is used in the VSME, LSME and ESRS Set 1.

BC47. Although the VSME has been designed with a highly simplified structure and language, maintaining the consistency between this Standard and the ESRS was a key methodological element.

BC48. The VSME has not been conceived as a simplification of ESRS Set 1. Rather, it has been designed based on the frequently observed data requests from lenders, investors and corporate clients of SMEs. The VSME also uses a more simplified language than the LSME to prioritise proportionality, however coherence has been preserved between VSME and ESRS LSME (and ESRS Set 1), in terms of structure, sustainability matters and key defined terms.

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BC49. The language simplification in the VSME ED (particularly in the Basic Module) aimed at clarifying defined terms in line with the terminology of ESRS Set 1. Additionally, following the public consultation, both preparer and user respondents requested further language simplifications and deeper explanations within the guidance. For this reason, the SRB and SR TEG have requested that the EFRAG Secretariat add further guidance and further simplify the Standard. Part of these additional language simplifications are related to the 'if applicable' principle. The wording 'if applicable' at the beginning of a datapoint has now been replaced by disclosing the specific criteria for the applicability, i.e. explanations for when this disclosure requirement is 'applicable' for the reporting undertaking. This principle is further explained in the section 'Principles for the preparation of the sustainability report' below. Additionally, for certain disclosures, semi-narrative, 'yes/no' disclosures were specifically provided for certain social datapoints that SMEs previously perceived as too complex to disclose on.

Trickle-down effect and value chain cap

BC50. This section presents the assessment of EFRAG SR TEG and the EFRAG SRB about the role that the VSME would play in allowing a satisfactory coverage of the corresponding datapoints in ESRS for large undertakings that have to report on their value chain. This assessment has been confirmed by specific questions in the public consultation.

BC51. Under the provisions of the CSRD (Art. 29(b)(4)), the ESRS Set 1 for large undertakings shall not specify disclosures that would require large undertakings to obtain information from SMEs in their value chain that exceeds the information to be disclosed pursuant to ESRS that EFRAG is developing for listed SMEs (LSME ESRS). EFRAG's work on the VSME identifies this legal requirement as 'value chain cap'. Some stakeholder requested the use of VSME as value chain cap, however this does not correspond to the legal content of the CSRD.

BC52. At the date of the issuance of VSME, EFRAG has not yet issued its technical advice on ESRS LSME.

BC53. While the vast majority of SMEs that are part of the value chain of large undertakings is not in the scope of the ESRS LSME, from a legal perspective the standard-setting process must follow the limitation introduced by legislators in the CSRD (i.e. the ESRS LSME, and not the VSME, is legally setting the value chain cap).

BC54. During the development of VSME the value chain cap and the need for proportionality were extensively debated to appropriately balance expectations of SME preparers and users of SME information. Part of the discussions focused on the so-called 'trickledown effect' (i.e. the reporting cost of preparation for non-listed SMEs derive from reporting obligations of their counterparties that are large undertakings and applying ESRS Set 1).

BC55. The table in Annex 8 provides a detailed analysis of ESRS Set 1 datapoints with a value chain dimension (see the value chain map in the EFRAG IG 2 Value Chain Implementation Guidance) with reference to the 'trickledown effect' under two perspectives:

(a) Perspective 1, focuses on the potential cost of preparation for SME suppliers due to data requests for ESRS reporting from Set 1 preparers. This perspective looks at what the corresponding datapoints are in the VSME and how proportionate they are. This perspective covers the trickle-down effect and takes account of the Set 1 provisions and guidance regarding the preparation of information related to value chain (particularly, in relation to the collection of data and the use of secondary data such as proxies, statistics and estimates).

(b) Perspective 2 focuses on the correspondence between the value chain datapoints in Set 1 and those in the VSME. This perspective looks at whether and to what extent there could be potential (additional) trickle-down effects on SMEs derived from data not covered by the VSME.

BC56. As a reminder, the guiding principle for VSME was simplification, while meeting users' needs. VSME is sector agnostic. Specific sectorial perspectives, as well as supply chain management policies or labels, data platforms developed by certain groups of undertakings ('specific arrangements'), may introduce specific requirements that are not covered by the analysis presented in Annex 8.

BC57. EFRG SR TEG and the EFRAG SRB concluded the following:

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(a) While the ESRS cannot result in large undertakings having to request disclosures that are not included in the ESRS LSME, the VSME is intended to play a key role in supporting SMEs, when they prepare the information needed by large undertakings for ESRS reporting, as well as for other obligations including for business purposes.

(b) Therefore, the VSME Modules (Basic and Comprehensive) include simplified disclosures that generally correspond to the reasonable expectations of ESRS Set 1 preparers (i.e. large undertakings that prepare their sustainability statement under the ESRS). As a consequence, non-listed SMEs that apply the VSME will in general be able to meet the data requests defined in ESRS Set 1 except for specific cases.

(c) These cases correspond to disclosures that could trigger additional data requests from large undertakings, either due to their ESRS reporting obligations or for other obligations and business purposes. These disclosures, are not included in the VSME, due to their excessive complexity for non-listed SMEs in general. They are principally of a sectorial nature (GHG removals, microplastics, substances of concern/high concern, resource inflows), and are mainly needed for management or specific arrangement purposes.

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Structure of the VSME

BC58. As a result of the structural changes previously described, the Standard is composed of two modules: the Basic Module and the former Business Partners Module, now renamed 'Comprehensive Module'. The change of name was requested in the public consultation to indicate that business partners may request more comprehensive information beyond what is covered via the Basic Module.

BC59. Paragraph 5 of the VSME explains that the Standard consists of 2 modules:

(a) *Basic Module:* This Module is the target content for micro-undertakings and constitutes a minimum requirement for other SME. Following the public consultation, both preparers and users agreed on the importance of this Module. As a result of the public consultation, it was decided at the SRB to keep this Module with a highly simplified language as an entry level module for non-listed SMEs. Following the public consultation, the language of this Module was further simplified. All the disclosures have to be reported on. Compared to ESRS Set 1, the concept of materiality was removed from this Module and replaced with the concept of 'applicability' as the materiality analysis requirement was considered too complex for non-listed SMEs. This is consistent with the feedback EFRAG received during the public consultation. In general, when the undertaking's circumstances are different from those that would trigger disclosure of that specific datapoint, no information for the specific datapoint has to be provided.

(b) *Comprehensive Module (former Business Partners Module)*: SMEs are expected to use this Module to cover the more comprehensive ESG requests from business partners on top of the Basic Module. The Module includes the metrics required by financial market participants (SFDR PAI Table 1, Pillar 3, Benchmark regulation) as well as other metrics relevant for business counterparts. The assumption largely confirmed in public consultation, is that the EU SF datapoints can satisfy the data needs of both banks or corporates as SFDR PAI are considered proxies to manage the sustainability profile of SMEs clients (banks/investors) and suppliers (corporates). As in the case of the Basic Module, metrics are to be reported 'if applicable'. This was an important change stemming from the public consultation since the materiality analysis was removed from the VSME.

BC60. EFRAG SR TEG and the SRB considered a modular approach to be a logical and practical way to address the complexity of dealing with a broad and diversified class of undertakings (from less than 10 employees to 250 employees). It also assists in meeting two objectives: (i – primary objective) to satisfy a substantial part of the data demands from business partners and (ii – secondary objective) to provide a very simplified approach for entrepreneurs to embark on the sustainability journey. This was confirmed in the public consultation as respondents indicated that the VSME may cover up to 80% of the information requested by business partners (i.e. banks, investors, and large undertakings). It is important to note that specific sectorial information could not be covered by the VSME, as this Standard is sector-agnostic.

BC61. There is also a third way of using VSME: SMEs may choose to adopt the Basic Module only or to complement it with the Comprehensive Module, depending on the maturity of their sustainability practices and the data demands they are subjected to. The adoption of the modular approach allows for the definition of a path from the Basic Module to more sophisticated reporting.

BC62. The two Modules have been defined on the basis of:

(a) feedback from EFRAG SR TEG and the SRB collected in the internal consultation during summer 2023 and the written consultation of the EFRAG VSME Community and SME Expert Working Group (details in Annex 4 and Annex 5 of this Basis for Conclusions);

(b) in-depth analysis of ESG questionnaires of business partners;

(c) outcome of outreach events (detailed information in Annex 5 of this Basis for Conclusions);

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(d) content of a working document prepared by Cluster 8 of the EFRAG Project Task Force ESRS (PTF-ESRS). The PTF developed the Exposure Drafts for the ESRS Set 1 before the completion of EFRAG's reform, but the Cluster 8 working document was not approved by the EFRAG PTF-ESRS as Set 1 was the priority. EFRAG SR TEG and the SRB considered that the research performed by Cluster 8 was instrumental to speed up the process of developing the VSME[7]; and

(e) content of ESRS Set 1 that was considered as a 'cap', i.e. in general a datapoint not being in Set 1 is not included. However, as a result of the public consultation, certain disclosures were introduced in order to satisfy the data demands from business partners and to simplify reporting for preparers. These are:

i. B1 paragraph 24(e)(vii) on geolocation since geolocation data requires more precise location information than the NUTS system in ESRS Set 1, which, at its most narrow level (NUTS 3) identifies only small regions. In terms of decimal degrees of coordinates, NUTS 3 corresponds to coordinates with one decimal place. Coordinates with five decimal places, on the other hand, allow for the identification of, for example, individual trees on a map, thus providing much more essential information for the purposes of the Standard. Most geolocation tools and platforms handle coordinates with up to eight decimal places. The more decimal places, the more accurate and specific the location is, which is the objective of geolocation. Google Maps, for example, at its most basic form, handles coordinates with six decimal places (and 14 decimal places at its most advanced form). Therefore, for the VSME it has been decided to ask for coordinates with five decimal places, which will give companies leeway (to use the most rudimentary tools for the identification of coordinates, while still providing accurate information) and will allow for the use of most tools, platforms or information systems for the treatment of geolocation data by financial institutions, consultants or other stakeholders in a later phase. The need for more accurate and precise geolocation information in the VSME thus prevents the alignment with the NUTS system. For more details, please refer to BC90 below; and

ii. B7 paragraph 38 (c) on annual mass-flow, which was inserted to simplify the datapoints on recycled and recyclable content in products and packaging (refer to BC126 below for details).

BC63. The EFRAG Secretariat analysed 12 examples of ESG questionnaires, which included two national central banks, four national federations, one national credit information provider, one national bank, one rating agency, and three mixed banks and supply chain (international initiatives) questionnaires. These questionnaires cover around 26 000 SMEs and are part of initiatives that comprise approximately 700 banks and 450 companies in the value chain. Please note that some of these questionnaires have an international scope. In addition, the EFRAG Secretariat also analysed a questionnaire from one ESG rating agency that is used by more than 100 000 companies.

BC64. On this basis the EFRAG Secretariat has identified the relevant recurrences of DRs in the VSME in the existing questionnaires. In addition, the public consultation tested which disclosures were considered feasible for preparers and a 'must have' for the users. The table on the next page summarises those elements.

Datapoint in the VSME	Number of questionnaires in which it is asked	Public consultation results (supported/ not supported)	Additional information
Basic Module			
Disclosure B3 – Energy and greenhouse gas emissions	12	Supported	Simplifications requested plus additional datapoint on

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Datapoint in the VSME	Number of questionnaires in which it is asked	Public consultation results (supported/ not supported)	Additional information
			energy intensity requested
Disclosure B4 – Pollution of air, water and soil	7	Supported	'If applicable' clarified. Reference to EMAS removed.
Disclosure B5 – Biodiversity	4	Supported	Not modified (added guidance)
Disclosure B6 – Water	9	Supported	Not modified
Disclosure B7 – Resource use, circular economy and waste management	9	Supported	Simplification by introducing the concept of mass flows plus semi-narrative option given to describe circularity principles.
Disclosure B8 – Workforce – General Characteristics	8	Supported	Additional datapoint on the employee turnover rate requested with a threshold.
Disclosure B9 – Workforce – Health and safety	3	Supported	Not modified
Disclosure B10 – Workforce – Remuneration, collective bargaining, and training Point (b) percentage gap in pay between its female and male employees	7	Supported	Reformulation of adequate wages. Threshold adjusted to Pay Transparency Directive for gender pay gap.
~~Disclosure B11 – Workers in the value chain, affected communities, consumers and end-users~~	-	Not supported	Disclosure removed. However, the key aspects have been kept within B2 (practices/ policies and future initiatives)
Disclosure B11~~2~~ – Convictions and fines for corruption and bribery	4	Supported by banks, not by SMEs	Not modified
Narrative-PAT module			**Not supported: materiality and comparability of narrative information**
~~Disclosure N1 – Strategy: business model and sustainability related initiatives~~	10	Partially supported	Moved from PAT to Comprehensive Module
~~Disclosure N2 – Material sustainability matters~~	Not applicable	Not supported	Seen as too complex by preparers, and not comparable and reliable enough for users
~~Disclosure N3 - Management of material sustainability matters~~ ~~Par 60. Actions taken in the reporting period to improve its energy efficiency and to reduce its greenhouse gas emissions~~	7	Partially supported	Seen as complex by preparers and essential for users both banks and large undertakings. Banks suggested reformulation as seminarrative. The
~~Disclosure N3 - Management of material sustainability matters~~	3		

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Datapoint in the VSME	Number of questionnaires in which it is asked	Public consultation results (supported/ not supported)	Additional information
~~Par 61. Policies, actions and targets in relation to (i) workers in the value chain; and/or (ii) consumers and end-users; and/or (iii) affected communities~~			integration of this disclosure in B2 was welcomed by both prepares and users in the post-consultation workshops.
~~Disclosure N3 - Management of material sustainability matters~~ ~~Par 62. Actions taken to address breaches in procedures and standards of anticorruption and anti-bribery.~~	8		
~~Disclosure N4 – Key stakeholders~~	7	Not supported	Seen as complex and not essential.
~~Disclosure N5 – Governance: responsibilities in relation to sustainability matters~~	7	Partially supported	Preparers said that for most SMEs the disclosure is not applicable, but feasible. Essential for banks.
Comprehensive module			
Disclosure C1 – Strategy: business model and sustainability related initiatives	10	Partially supported	Moved from PAT to Comprehensive Module
Disclosure C2 – Description of practices, policies and future initiatives towards a more sustainable economy	N/A	N/A	N/A
Disclosure C3 – GHG reduction and climate transition	7	Content supported	Request to merge former BP4 and BP3. Former BP4 simplified.
	7	Content supported	
Disclosure C4– Climate risks	9	Content supported	Seen as too complex by SMEs, but essential for users. Revised disclosure with simplification, appreciated by both stakeholder groups in post-consultation workshops
~~Disclosure BP6 – Hazardous waste and radioactive waste ratio~~	4	Partially supported	Not considered relevant/ applicable by SMEs, and considered essential by users. Integrated into B7.
Disclosure C5 – Workforce (General) Additional characteristics	N/A	N/A	Additional datapoints requested by users in the public consultation included as may datapoints.
Disclosure C6: Human rights policies and processes	6 (former BP7)	Partially supported	Two disclosures merged together. Simplified substantially (drop-down, Yes/No menu). **Simplifications welcomed by stakeholders** in post consultation workshops.
	5 (former BP8)	Supported	

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Datapoint in the VSME	Number of questionnaires in which it is asked	Public consultation results (supported/ not supported)	Additional information
Disclosure C7 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles	3	Supported	Simplified substantially (drop-down, Yes/No menu). Simplifications welcomed by stakeholders in post consultation workshops. Additional datapoint for workers in the value chain, affected communities and consumers/end-users following SR TEG and public consultations.
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	5	Supported	Seen as essential by users
C9 – Gender diversity ratio in the governance body	6	Partially supported	Seen as essential by users and as not always applicable/ relevant by preparers.
~~Disclosure BP10 – Work-life balance~~	1	Not supported	Removed, not relevant for users
~~Disclosure BP11 – Number of apprentices~~	3	Not supported	Removed, not relevant for users

BC65. While in outreaches, all categories of business partners recognised the three modules of the VSME ED as relevant, the public consultation highlighted that the Narrative-PAT Module would be of limited use for business partners and would be too difficult to prepare for preparers. The main complexity of the Module was linked to the materiality analysis that was considered not feasible for preparers and not reliable for users. In addition, banks confirmed that the consolidation of the information in the Narrative Module would be too complex, given its qualitative and less structured nature in the context of the very large number of SME clients in their banking book. On the basis of the public consultation feedback, EFRAG SR TEG and the EFRAG SRB have deleted the Narrative-PAT Module and reallocated the narrative disclosure considered essential by users (former N1, N3 and N5) to the Basic and Comprehensive Modules. The feedback also confirmed that the same modules would serve the different categories of Business Partners as all of them consider confirmed the same disclosures as essential, thus confirming the assumption tested in this consultation.

BC66. Paragraph 5 of the VSME refers to paragraph 24, which illustrates the available options for the preparation of a sustainability report, adopting one or more of the two modules of the VSME. Once chosen, the undertaking shall comply with a module in its entirety, i.e. including the information in each disclosure that is applicable to the undertaking's specific circumstances to avoid cherry picking and promoting comparability. To ensure flexibility, the undertaking may however include selected disclosures from either of the remaining modules and/or entity-specific or sector-specific disclosures (see paragraph 10 of the VSME) to support the provision of relevant, faithful, comparable, understandable and verifiable information.

BC67. Paragraph 6 of the VSME explains that the Basic Module is a prerequisite for the Comprehensive Module. The flexibility described in BC 66 is assumed to lower entry barriers for preparers and would allow for the meeting of users' needs to the maximum extent possible.

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BC68. Paragraph 7 refers to Appendix A 'Defined Terms', which provides a glossary for the terms used. This glossary has mostly the same definitions as ESRS Set 1 to align the concepts and ensure conceptual coherence. For some terms, however, small changes to Set 1 have been introduced and those simplifications are mapped in the Annex 7 of this document. Finally, definitions to help SMEs such as definitions for 'governance', 'business Conduct' and 'gross emissions' have been introduced.

Principles for the preparation of the sustainability report (Basic Module, Comprehensive Module)

Entity-specific component

BC69. Paragraph 10 of the VSME refers to the inclusion of additional entity-specific information. 'Depending on the type of activities carried out by the undertaking, the inclusion of additional information (metrics and/or narrative disclosures) not covered in this [draft] Standard is appropriate in order to disclose sustainability issues that are common in the undertaking's sector (i.e. typically encountered by businesses or entities operating within a specific industry or field) or that are specific to the undertaking, as this supports the preparation of *relevant, faithful, comparable, understandable and verifiable information*. Appendix B provides a list of possible sustainability issues.'

BC70. This component was not significantly changed following the public consultation. The inclusion of the entity-specific component was extensively discussed by EFRAG SR TEG and the SRB. Some initially supported this exclusion to avoid increasing the costs of preparation with the related judgement that the entity-specific component entails. Others supported such inclusion only on a voluntary basis. Finally, EFRAG SR TEG and the SRB agreed to include the entity-specific component given its importance particularly to add the sector-specific element. Therefore, the VSME refers to 'issues that are common in the undertaking's sector'. This approach was confirmed by the public consultation.

BC71. As a result of the public consultation, once the standard is released by the European Commission, EFRAG may also develop a set of SME guidance of sustainability issues per sector. EFRAG could cover this as part of the ongoing multi-annual sector programme. Indeed, the stakeholder's engagement and public consultation have shown that corporate clients may require additional specific data for certain sectors and therefore already signal that this dimension to SMEs may be useful.

BC72. This is relevant to both the Basic Module and in the Comprehensive Module. For the latter, an entity-specific consideration related to Scope 3 GHG emissions has been introduced, especially as indirect emissions are particularly relevant to certain sectors. This approach was confirmed during the public consultation. GHG scope 3 emission is not a requirement for VSME unless the undertaking decides considering the sector, to report under the Comprehensive module.

BC73. Following the public consultation, an additional paragraph has been added, which clarifies that for any of the metrics of the Standard, the reporting undertaking may provide additional qualitative information to complement disclosure's metrics: *'The undertaking may complement the metrics from the Basic and Comprehensive modules with additional* qualitative *and/or quantitative information, where appropriate, in accordance with paragraph 10 above.'* This was reviewed and welcomed by EFRAG SR TEG and the SRB.

Comparative information

BC74. Following the public consultation, SR TEG and the SRB, decided to move the paragraph on comparative information to the principles part of the Standard. This was done to ensure that this principle on comparability is applied throughout the standard and not merely to the Basic Module. The inclusion of comparative information adds to the relevance and comparability of the information across periods. However, for simplification purposes, such a disclosure containing comparative information would only be provided from the second year of reporting. This principle is now in paragraph 12 of the VSME.

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If applicable principle

BC75. Paragraph 13 indicates that the disclosures of the Standard are to be reported only 'if applicable' to the undertaking's circumstances. This important simplification was introduced following feedback during the standard-setting process. The reason is that the performance of a materiality analysis would be too complex for micro-undertakings given the judgement and sophistication required in contrast to their average complexity and capabilities. This is to guide micro-undertakings and other SMEs in assessing and filtering whether the disclosure requirement applies to their circumstances or not.

BC76. During the public consultation, most respondents agreed with the 'if applicable' principle, stating this was a useful approach to replacing materiality. Various respondents asked to clarify the meaning of 'if applicable' within the Standard. It was also requested to extend the 'if applicable' principle to other modules of the Standard and not solely to the Basic Module.

BC77. Following these comments, SR TEG and the SRB agreed to extend the 'if applicable' principle to the Comprehensive Module (as the materiality analysis is removed) and to clarify in paragraph 13 of the VSME that omitting an 'if applicable' disclosure, when considered not applicable, is a principle applicable to both the Basic and Comprehensive Modules.

Inclusion of subsidiaries in the reported data

BC78. This paragraph recommends that the undertaking prepares its sustainability report on a consolidated basis (i.e., including the information of its subsidiaries), where relevant.

BC79. In the public consultation, most respondents across the three categories (preparers, users and others) agreed with the proposal to report on a consolidated basis. However, SME associations demanded more flexibility for preparers when choosing whether to include subsidiaries.

BC80. In addition, as a result of the public consultation, SR TEG and the SRB agreed to add a second paragraph to this principle, exempting SMEs from reporting if their parent undertaking includes the subsidiary/subsidiaries in their consolidated report.

Timing and location of the sustainability report

BC81. Paragraph 16 ensures that the undertaking has the option of publishing its sustainability report either as a separate section of the management report or as a different document. This is to reflect the different legal regimes in European Member States.

BC82. In the public consultation, respondents were specifically asked whether they agreed with the timing and location principle of the ED. SMEs (preparers) asked for more flexibility as a report based on a yearly basis may add significant costs to preparation for SMEs. At the same time, the majority of users confirmed that the sustainability report shall be prepared on an annual basis (in alignment with the Pillar 3 framework).

BC83. Following these comments, the SRB and SR TEG have clarified the timing and location of the sustainability report (paragraph 16). Reporting undertakings are now requested to report on an annual basis, if their business partners request them to do so. However, it has also been specified that if the data does not change from the previous reporting period, the reporting undertaking may refer to the previous reporting period and mention so within the disclosure. Additionally, as a result of the clarification of the objectives of this Standard in BC4, with the primary objective being the ability to respond to a business counterparty's requests, paragraph 17 of the VSME specifies that the reporting undertaking may decide to make the report available to the public.

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Cross references to EMAS

BC84. In the public consultation, respondents indicated that the Eco-Management and Audit Scheme (EMAS) is too complex for SMEs and should therefore not be referenced. During multiple SR TEG meetings, the inclusion of EMAS references was discussed, and diverging opinions emerged. Some SR TEG and SRB members supported the mention of EMAS, but SME representatives were strongly against it on the grounds of EMAS being too complex and not widely used by SMEs. The references to EMAS in paragraph 18 in relation to incorporation by reference as well as in other disclosures were therefore removed. Moreover, the reason for rejecting this suggestion is that VSME is a demand driven tool and users will need to identify the VSME information as a coherent set of disclosures. Integrating it with other reports would risk obscuring the information requested by counterparties in the VSME. In addition, there is full flexibility as to where to locate VSME report, i.e. as an attachment to the management report, when prepared, or to the financial statements, or in a separate document. Nothing prevents a company from attaching the VSME report to another report. Finally, there is provision for incorporation by reference in paragraph 18, which allows items from another report to be incorporated in VSME thus avoiding double reporting. While exploring the possible integration of EMAS and VSME disclosures is out of the current mandate received by EFRAG, it is an element that the EC could potentially explore in the future.

Classified and sensitive information, and information on intellectual property, know-how or results of innovation

BC85. Some consider that for SMEs the issue of sensitive information may be proportionally more important compared to large undertakings given that the latter have more means to invest in innovative technology, products and solutions. For small start-ups, intellectual property may even be a pervasive competitive advantage.

BC86. During the public consultation, there was a request to improve and clarify the definition of 'sensitive information' and to allow for more flexibility. Following this comment, the EFRAG Secretariat initially proposed to leave the current phrasing unchanged. However, during an SR TEG discussion it was suggested to delete the two conditions (a and b) of former paragraph 16 of the ED arguing that these two former conditions are appropriate for compulsory reporting but not for voluntary reporting. This change was tested and welcomed by both banking and SME associations in the post-consultation workshops. Following this, this principle has been updated as follows: 'When the provision of the disclosures in this [draft] Standard would require disclosing classified or sensitive information, the undertaking may omit such information. If the undertaking decides to omit such information, it shall simply state that is the case under disclosure B 1 (see paragraph 24)'. This has been reiterated in the Basic Module, disclosure B1 – Basis for preparation, in paragraph 24(b).

Coherence and linkages with disclosures in financial statements

BC87. Following discussions held at SR TEG, it was decided to expand the scope of this principle to the entire Standard. This principle in the ED was previously only applicable to the Narrative-PAT and Business Partners Modules of the ED. The content did not change from the ED. The decision was taken at SR TEG level and approved by the SRB based on the need to expand the scope of this principle to the entire Standard.

Basic module

BC88.

Disclosure	Paragraph reference	'If applicable'/ always to be reported on/ may disclosure
B1 – Basis for Preparation	24	**Always to be reported on**
	25	**If applicable**

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B2 - Practices, policies and future initiatives for transitioning towards a more sustainable economy	26, 27, 28	**If applicable**
B3 – Energy and greenhouse gas emissions	29	**Always to be reported, breakdown if available**
	30, 31	**Always to be reported on**
B4 – Pollution of air, water and soil	32	**If applicable**
B5 – Biodiversity	33	**If applicable**
	34	**May disclosure**
B6 – Water	35	**Always to be reported on**
	36	**If applicable**
B7 – Resource use, circular economy and waste management	37, 38 (c)	**If applicable**
	38 (a)(b)	**Always to be reported on**
B8 – Workforce – General characteristics	39 (a), 39 (b)	**Always to be reported on**
	39 (c)	**If applicable**
	40	**To be reported on when above the threshold**
B9 – Workforce – Health and safety	41	**Always to be reported on**
B10 – Workforce – Remuneration, collective bargaining and training	42 (a), 42 (c), 42(d)	**Always to be reported on**
	42 (b)	**To be reported on when above the threshold**
B11 – Convictions and fines for corruption and bribery	43	**If applicable**

Basic Module – General information

B1 – Basis for preparation

BC89. This disclosure has been complemented with additional metrics following the public consultation. The previous datapoints already included in the VSME ED as part of this disclosure have been kept. B1 (paragraph 24) continues to ask for the modules that the undertaking is reporting on. The Basic Module remains the entry level and the pre-requisite for all reporting undertakings.

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BC90. With regard to the additional datapoints, a total of eight new metrics have been added to B1 because they were requested by users in the public consultations. The additional metrics are the following: 1) the undertaking's legal form, 2) the NACE sector classification code(s), 3) size of balance sheet (in euro), 4) turnover (in euro), 5) number of employees in full time equivalents (FTEs) or headcount, 6) country of primary operations and location of significant asset(s), 7) geolocation of sites owned, leased or managed, and 8) ESG certificates (if any). SR TEG and the SRB decided to add the geolocation datapoint directly in B1 as a way of covering banks' requests for geolocation data in disclosures B5 – Biodiversity and disclosure C4 – Climate risks. By requesting geolocation directly in B1, a double disclosure scenario is avoided. For those additional datapoints, specific guidance has been added, including a table to help preparers structure their disclosure of information. This table was tested in the post-consultation workshops with users and preparers was well supported. The SRB discussed the geolocation as it may be a sensitive datapoint but concluded that, considering the primary function of the VSME of a bilateral exchange of information and considering the clause on sensitive information whereby the undertaking may omit this datapoint, it agreed to keep it as important for the users.

BC91. Additional guidance to support the preparation of this disclosure can be found in paragraphs 68 to 77 of the VSME.

B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

BC92. This disclosure has changed significantly following the public consultation. During the public consultation, users/banks requested to expand the scope of former B2 to cover policies and future initiatives beside practices.

BC93. This request was accompanied with user concerns over the Narrative-PAT Module, which was found to be overly complex and lacking comparability given its purely narrative nature. Despite these general concerns with the Narrative-PAT Module, former disclosures N3 (Management of material sustainability matters) and N5 (Governance: responsibilities in relation to sustainability matters) were considered essential by users and feasible by most preparers. Hence, users/banks recommended relocating those two disclosures (N3 and N5) in B2 in a simplified, non-purely narrative format.

BC94. EFRAG SR TEG approved the recommendation to incorporate former N3 and N5 into B2. Banking associations and SME representatives supported the revised disclosure B2 as well as the corresponding table during post-consultation workshops in September 2024.

BC95. The EFRAG SRB subsequently discussed whether having a semi-narrative descriptive component in the Basic Module was appropriate. Some SRB members raised concerns about the potential costs for preparation that semi-narrative disclosures may have on SMEs. Disclosure B2 was ultimately approved by the EFRAG SRB under the condition that the descriptive components be moved to the Comprehensive Module (see C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy).

BC96. As a result, the final version of B2 requires that undertakings state whether they have practices, policies or future initiatives in place and whether they are supported by targets. Undertakings may refer to the list of sustainability issues in Appendix B, which reflects the ten sustainability matters found in ESRS Set 1 and may use the table in the guidance, which includes 'yes/no' questions, to fulfil disclosure B2. On 'current practices', B2 retains the original wording.

BC97. The disclosure of current practices, along with current polices, future initiatives and targets, aims to help business partners assess SMEs' level of maturity and engagement with sustainability matters. The term 'practices' was introduced as a simplification, recognising that SMEs often operate with informal practices or future initiatives rather than formalised policies.

BC98. Additional guidance related to value chain workers, affected communities and end consumers was created for B2 to illustrate that this disclosure covers the SFDR PAI 11 from Table 1 in relation to the lack of processes and compliance mechanisms to monitor compliance with UNGP and OECD MNE. It was important to make such connection and avoid duplication as a minority of EFRAG SRB members considered that C6 was to be modified to include the aforementioned groups of affected stakeholders.

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BC99. The EFRAG Secretariat will develop guidance for SMEs on the list of possible actions/policies for SMEs covering the ten sustainability issues and provide relevant examples of impacts on workers in the value chain and affected communities. Additionally, the guidance will include a list of sustainability matters per sector.

BC100. Additional guidance to support the preparation of this disclosure can be found in paragraphs 78 to 80 of the VSME.

Basic Module – Environmental metrics

BC101. The VSME has been developed as an independent standard, developed specifically for the complexity and needs of non-listed SMEs and not as a simplification of the corresponding disclosure requirements in ESRS Set 1. However, consistency with ESRS concepts has been maintained to the maximum extent possible without compromising on simplification, including language.

B3 – Energy and greenhouse gas emissions

BC102. Energy and greenhouse gas emission disclosure requirements are essential in a sustainability report, given the relevance of climate change and the strong link between energy use and emissions. This is present in all 12 of the current questionnaires analysed (refer to BC64) and was confirmed by the public consultation and the field tests.

BC103. This disclosure also corresponds to SFDR PAI indicators, which were confirmed as essential elements to consider during the public consultation and field test. In addition, during the public consultation, users (banks) indicated the relevance of this datapoint from a Pillar 2 perspective according to 23(a)(vi) of EBA/CP/2024/02. The information on energy consumption required in paragraph 29 was guided by the SFDR PAI indicator 5 from Table 1 and indicator 5 from Table 2 (Annex 1).

BC104. Total energy consumption is understood as final energy consumption by the undertaking, i.e. the energy entering organisational boundaries. As with ESRS E1, if the company converts one energy type into another, the energy form to be considered is the one that has entered the boundaries of the company. For example, if an SME uses a gas boiler to produce hot water, the energy consumption is that of gas rather than hot water, which is the final energy carrier.

BC105. The main challenge for energy was to balance meaningful disclosures, including relevant breakdowns on the different types of energy used and the related cost of preparation. Therefore, detailed breakdowns were previously requested in addition to total energy, such as by fossil fuel energy types (e.g. gasoline, diesel, coal) and electricity per utility bills further split between renewable and non-renewable electricity. Other forms of energy (e.g. biomass solid fuels) were decided to be reported in total, given that these were expected to be relatively minor portions of the overall consumption of energy by SMEs.

BC106. The table with the energy consumption breakdown is the result of public consultation requests from preparers to reformulate requirements, allowing for a clearer split between non-renewable and renewable energy sources. Users and SR TEG members supported the reporting in such tabular format.

BC107. During the public consultation, preparers suggested including additional datapoints on the energy performance certificates of buildings and on vehicle emission standards. However, users recommended their deletion on the basis that energy performance certificates are only needed for buildings used as collateral for a loan and requested bilaterally in the mortgage files. SR TEG agreed on removing such datapoints from the Standard as they were not meaningful to banks.

BC108. The initial ‘if available’ condition was replaced with ‘if the undertaking can obtain the necessary information’.

BC109. The information on GHG emissions required in paragraph 30 was guided by SFDR PAI indicator 1 (Table 1 of Annex 1). In this context, it was considered that Scope 1 and location-based Scope 2 (in line with the GHG Protocol and ISO 14064-1) should be minimum requirements. Market-based Scope 2 figures are provided on a voluntary basis (‘may’).

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BC110. The information on GHG intensity required in paragraph 31 was guided by the SFDR PAI indicator 3 (Table 1 of Annex 1). During the public consultation, users confirmed the need for this requirement. SR TEG further recommended the inclusion of the footnote referring to the automated calculation of the GHG intensity ratio through the future online tool that will probably be developed after the publication of the VSME Standard, given that both the numerator (GHG emissions) and denominator (turnover) are provided by the undertaking through the VSME Standard.

BC111. After the public consultation and upon a suggestion by users, the guidance has been further improved to clarify reporting on renewable and non-renewable energy sources. In addition to that, the inclusion of a summary of methodological information from the GHG Protocol, including examples of tools developed by private and public initiatives to help undertakings in developing their GHG emissions inventory, was the result of a suggestion by SR TEG. The SRB additionally suggested to provide more flexibility to reporting organisations in the choice of reporting frameworks to be used, which resulted in referencing ISO 14064-1 (without requiring certification) as an alternative.

BC112. Additional guidance to support the preparation of this disclosure can be found in paragraphs 81 to 109 of the VSME.

B4 – Pollution of air, water and soil

BC113. The information on pollutant emissions required in paragraph 32 is aligned with the SFDR PAI indicator 8 from Table 1 as well as indicators 1, 2 and 3 from Table 2 (Annex 1), as per sector-agnostic ESRS. This disclosure is included in seven of the twelve questionnaires analysed (refer to BC64). The disclosure on pollution is limited to quantitative information on emissions into air, water and soil, including the type of pollutant. These requirements were framed as applicable only to those undertakings already reporting on pollution emissions and allow for a direct reference or link to pollution information that is already published by the undertaking.

BC114. Initially, under this disclosure the undertaking was called to report on its pollutants only if this was already required by existing laws, such as the IED or E-PRTR (as per sector-agnostic ESRS) or other frameworks, such as Eco-Management and Audit Scheme (EMAS). After the public consultation, SR TEG agreed to remove from the main text any reference to or examples of specific pieces of legislation or Environmental Management Systems (EMS) such as EMAS and rather to mention and explain them in the guidance, including additional examples of EMS (i.e. ISO), to avoid the sole focus on EMAS. This was in response to concerns raised by preparers that such references could potentially lead to double reporting due to unclear instructions. Specifically, regarding EMAS, SR TEG concluded that EMAS is overall too complex for SMEs and that it should therefore not be the sole focus of reporting. Additionally, the voluntary qualifier was included in correspondence with the EMS reference to address a recommendation by preparers. SR TEG further suggested better accounting for the local nature of pollution impacts by including reporting according to ‘other national regulations’ in addition to the generic qualifier ‘law’. Finally, it was noted by users during the public consultation that the original ‘if applicable’ condition was unclear, which led to a rephrasing of the requirement compared to the VSME ED to make the applicability condition more explicit by moving it to the first part of the disclosure.

BC115. The guidance, initially only providing an example of table for reporting and featuring information on the IED, the E-PRTR and EMAS, was updated to the new amendments (IED 2.0 and IEPT) and was further enhanced based on public consultation feedback. The new elements provided are a clarification on reporting for undertakings in shared offices as well as examples of air, water and soil pollutants and their occurrences. In this case SR TEG noted that a full list of pollutants would only overwhelm preparers and users and, hence, agreed to only list the main ones per each environmental media, as per content in the main pieces of EU law.

BC116. Additional guidance to support the preparation of this disclosure can be found in paragraphs 110 to 133 of the VSME.

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B5 – Biodiversity

BC117. The disclosure on biodiversity has been changed only marginally compared to the VSME ED. In fact, the field test and public consultation widely confirmed that this disclosure is essential for users. In addition, the disclosure is included in four of the twelve analysed questionnaires (refer to BC64). The introductory paragraph that was present in the VSME ED was deleted as no disclosure requirements were attached to it and was therefore perceived as unclear by preparers. For the rest, the disclosure has been limited to quantitative metrics related to land use of the sites in which the undertaking operates and that are located in or near biodiversity sensitive areas. Land use metrics are used as proxies of the undertaking's biodiversity impact. Separate metrics per each site are required. These metrics have to be reported only if applicable, i.e. if the undertaking has impacts on biodiversity or is potentially exposed to them, e.g. by having operations in or near biodiversity sensitive areas. Ambiguity existed on how to assess the proximity to such areas. During the public consultation, preparers and users raised the issue of the definition of 'near' biodiversity sensitive area. Hence, to simplify the definition of 'near', it was clarified in the 'Defined terms' (Appendix A) that it refers to areas inside, overlapping with (partially included) or adjacent to such a biodiversity sensitive area. Land-use footprint metrics are aligned with the reporting metrics used in EMAS[8]. Consistent reporting of land-use metrics over time will also allow the evaluation of the undertaking's land-use change. The requirement corresponds to the SFDR PAI indicator 7 (Table 1 of Annex 1).

BC118. Guidance has been further simplified to support the preparation of this disclosure. Paragraph 135 of the VSME has been introduced to provide tools that can help to identify protected areas and biodiversity sensitive areas. The reference to EMAS has been replaced in the guidance with summarised information on land use from the EMAS user guide to increase understandability for SMEs by avoiding language that is too technical and external references (requiring separate searches by SMEs), as requested in the public consultation and agreed by SR TEG.

BC119. Additional guidance to support the preparation of this disclosure can be found in paragraphs 134 to 141 of the VSME.

B6 – Water

BC120. Initially, this requirement was part of disclosure requirement B7 (relating to the circular economy aspect), but it was eventually decided to present it as a stand-alone element of disclosure. In terms of selected metrics, the requirements to disclose water withdrawal and water consumption were included to be consistent with the sector-agnostic ESRS and were found in nine of the twelve analysed questionnaires (refer to BC64). In addition, during the public consultation, users (banks) highlighted the relevance of this disclosure from a Pillar 2 perspective according to 23(a)(v) of EBA/CP/2024/02. An SR TEG discussion took place on the use of different terms, namely 'water use' instead of 'water withdrawal' and 'water consumption', the latter eventually chosen as the most understandable term for SMEs. It was concluded that the term 'water use' lacks definition in major corporate water reporting frameworks, such as the sector-agnostic ESRS, GRI, CEO Water Mandate, Water Footprint Network, CDP, WRI, IPIECA and SASB. Additionally, introducing new terminology is not desirable even if 'water use' or 'water consumption' may be understood as equivalent to the concept of 'water withdrawal'. 'Water use' can also be understood as the accounting of the multiple water flows within an undertaking – yet another new concept. Therefore, the definition of 'water withdrawal' in the sector-agnostic ESRS was used. The disclosure on 'water consumption' was retained given its importance despite the fact that its applicability may vary among undertakings. This applies specifically in connection to production processes. The major change to the VSME coming from the public consultation consists in the replacement of the 'if applicable' expression with the actual conditions of applicability for SMEs. Water intensity was also considered for inclusion as an additional advanced datapoint to the Basic Module; however, after a workshop with users and consultation with SR TEG it was deemed not relevant and hence removed from the draft.

[8] EMAS Regulation Annex IV

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BC121. Specific guidance was introduced to clarify the concepts of water consumption, water withdrawal and water discharge. A specific sub-section detailing water withdrawal in areas of high-water stress was incorporated with guidance on how to identify these areas. Following the public consultation, the applicability of the disclosure requirement on water consumption as opposed to that of water withdrawal was specified, including calculation guidance in the context of shared offices. A scheme on the use of water utility bills was also added to support the determination of water consumption.

BC122. Additional guidance to support the preparation of this disclosure can be found in paragraphs 142 to 158 of the VSME.

B7 – Resource use, circular economy, and waste management

BC123. The information on circular economy and waste management required in paragraphs 37 and 38 (a)(b) is aligned with the requirements in the sector-agnostic ESRS, paragraph 38(c), and is based on EMAS, and the coverage of hazardous and radioactive waste is in line with the SFDR PAI indicator 9 (Table 1 of Annex 1). The latter information was previously addressed under the former disclosure BP6, which has now been merged into this disclosure. This disclosure was requested in nine of the twelve questionnaires analysed (refer to BC64).

BC124. This disclosure was initially mainly narrative, reflecting the fact that generic disclosures on resource use management, waste management and application of circular economy principles are narrative in nature. However, some quantitative disclosures have been added given their relevance to users. Consequently, a disclosure on the recycled and recyclable content of goods and materials (and their packaging) was added and limited to specified sectors (manufacturing, construction and/or packaging processes) to reduce preparation costs. For all undertakings, the total annual waste generation (and breakdown by type) and the total annual waste diverted to recycling or reuse were included. The breakdown between ‘non-hazardous’ and ‘hazardous’ waste enhances transparency. After the public consultation, this disclosure was moderately adapted as per the changes described below.

BC125. Following the public consultation, it was confirmed at SR TEG that paragraph 37 of the VSME was an initial essential element of this disclosure, allowing SMEs to provide additional information on circularity principles. Nevertheless, it required some refinement as it was deemed too vague, which led to the current reformulation that focuses on the application or not of circular economy principles as well as on a description of this application.

BC126. Respondents to the public consultation also noted that the original datapoints on recycled and recyclable content in products and packaging were only applicable to certain undertakings, which was also confirmed at SR TEG (e.g. recycled content being feasible to obtain for undertakings producing their own products). To simplify these requirements, they were then replaced with one datapoint from EMAS on the annual mass flow of relevant materials used. This datapoint was further reformulated as a result of discussions at SR TEG to reflect the sectors that use mass flows within the scope of this sub-paragraph and to place an emphasis on significant material flows.

BC127. The previous disclosure BP6 on radioactive waste was merged with this disclosure after users confirmed its importance in the public consultation. Preparers also confirmed its feasibility. SR TEG proposed to make the requirement on radioactive waste a specification of hazardous waste. For this reason, a clarification was added in the guidance rather than in the main text.

BC128. After the public consultation, guidance on circular economy principles (based on definitions of the Ellen MacArthur Foundation, with key principles from the European Commission and on how to present information concerning generated waste), was complemented with further indications and explanations of the terms mass flow and hazardous waste (for which pictograms were also included). Concerning waste directed to recycling or reuse, since preparers noted some lack of clarify in the formulation of this requirement, guidance was hence provided to specify which type or recycling or reuse is expected. As for units of weight for waste generation and waste recycling or use, respondents to the public consultation noted that the prior reference to volumes was inconsistent with SFDR and requested further guidance. It was then allowed to use both weight and volume in the guidance.

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BC129. The SRB further recommended removing paragraph 38 of the VSME from undertakings generating only household waste (e.g. a pizza restaurant, an office) by introducing this flexibility into the guidance. This was done to reduce the potential costs of preparation for non-listed SMEs.

BC130. Additional guidance to support the preparation of this disclosure can be found in paragraphs 159 to 174 of the VSME.

Basic Module – Social metrics

B8 – Workforce – General characteristics

BC131. This disclosure requirement is limited to the total number of employees (by headcount or full-time equivalent) broken down by type of employment contract, gender and country. The public consultation raised concerns regarding the country breakdown datapoint, with numerous requests for clarification. Therefore, a specific reference to the country of the employment contract was added to clarify what country breakdown referred to. Given that the breakdown by country applies to undertakings that operate in more than one country, this is considered an 'if applicable' type of disclosure given that micro- undertakings are often based exclusively in one country and would not fulfil this breakdown. The types of contracts are limited to permanent and temporary. The guidance contains suggested tables to present the requested information on employee characteristics. The analysis of current business partners questionnaires (see BC64) showed that these are frequent data requirements, as they were included in eight of the twelve questionnaires analysed.

BC132. Feedback from the public consultation also contained many requests from users and others to include an additional datapoint on the employee turnover rate in the disclosure requirement. The post-consultation workshop with banking associations in September (2024) confirmed the relevance of this additional datapoint. After receiving further input from SME associations in a separate workshop in September (2024), EFRAG SR TEG approved the new datapoint with a threshold of 50-employees. The guidance was adapted accordingly and can be found from paragraphs 175 to 183 of the VSME.

B9 – Workforce – Health and safety

BC133. The disclosure requirement on health and safety is limited to information on the number and rate of recordable work-related accidents as well as the number of fatalities resulting from work-related injuries and work-related ill health (SFDR PAI datapoints in ESRS S1-14 (b) and (c)). The analysis of current business partners' questionnaires (see BC64) includes this information as this disclosure was found in three out of the twelve questionnaires analysed.

BC134. One EFRAG SR TEG member expressed reservations on the inclusion of commuting accidents as part of the disclosure requirement as the disclosure may differ based on national law. The guidance clarifies that accidents while travelling (outside of the SME's responsibility) are classified as work-related or not based on the applicable national legislation, which may vary across countries. A specific question was added to the public consultation in relation to commuting accidents to be work-related accidents. Guidance on the relevant formula and a numerical example was provided. The source of this disclosure is ESRS S1-14, which is an SFDR datapoint. It is based on the requirements from Article 29(b) of the CSRD together with the ILO Convention and OECD Guidelines.

BC135. EFRAG SR TEG and the EFRAG SRB concluded that the metrics on health and safety are mature within the reporting of undertakings, given the current requirements (Regulation (EC) No 1338/2008 on Community statistics on public health and health and safety at work and Framework Directive 89/391/EEC on measure to encourage improvements in the safety and health of workers at work).

BC136. Feedback from the public consultation included suggestions to add an additional paragraph addressing health and safety for non-employees. However, in September 2024, EFRAG SR TEG decided not to include this additional datapoint on non-employees.

BC137. Additional guidance has been included to support the preparation of this disclosure in paragraphs 184 to 191 of the VSME.

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B10 – Workforce – Remuneration, collective bargaining, and training

BC138. The analysis of current questionnaires (see BC64) highlighted that more than half included disclosure requirements on remuneration, collective bargaining and training. Therefore, these aspects have been included in the ED.

BC139. On remuneration, the initial disclosure required the ratio of entry-level wage to minimum wage to address adequate wages. However, feedback from the public consultation indicated that this metric was unclear, prompting several stakeholders to request clarification. In response, a proposal was presented to EFRAG SR TEG to modify the datapoint to 'whether the employees receive a pay that is above the minimum wage set by law or through a collective bargaining agreement'. SR TEG members approved this revision with the condition that the following specification is included 'equal or above the applicable minimum wage for the country it reports in'. Post-consultation workshops with banking associations and SME representatives in September (2024) confirmed the relevance of the updated datapoint. The guidance was adapted accordingly.

BC140. The gender pay gap between female and male employees metric was considered most pertinent for the largest companies in scope, leading to a threshold of 150 employees set to ensure appropriate representation. Additionally, the information required by this datapoint aligns with an SFDR PAI (Table I, indicator #12). Stemming from the public consultation and following SR TEG discussions and post-consultation workshops, it was agreed to seek further alignment with the Pay Transparency Directive[9], which will require undertakings with at least 100 employees to report on the gender pay gap starting from 7 June 2031.

BC141. Whilst the nature or scope of collective bargaining agreements may vary across countries, the definition for collective bargaining in ESRS S1 covers the main types of agreements in the Member States of the European Union and is applicable to the VSME context. Therefore, EFRAG SR TEG and the EFRAG SRB agreed to include the percentage of employees covered by collective bargaining agreements. Freedom of association and collective bargaining are fundamental rights enshrined in the international and European human rights instruments referenced in the CSRD, including in UN UDHR Article 23, the EU Charter of Fundamental Rights Article 12 and the ILO Convention 87. This disclosure demonstrates the extent to which these rights have been exercised to determine the working conditions of the employees of an SME.

BC142. The datapoint on training is consistent with Article 29b 2 (b) (i) of the CSRD. Education, training and lifelong training is also defined in Principle 1 of the European Pillar of Social Rights. The public consultation indicated that the concept of informal training lacked clarity. To address this, EFRAG SR TEG agreed to simplify the disclosure by limiting it to the average number of annual training hours per employee and disaggregated by gender.

BC143. Additional guidance to support the preparation of this disclosure is available in paragraphs 192 to 205 of the VSME.

Basic Module – Governance metrics

B11 – Convictions and fines for corruption and bribery

BC144. This disclosure remains unchanged from the ED. The analysis of current questionnaires highlighted that four of the twelve questionnaires included similar disclosures. One EFRAG SR TEG member disagreed with the inclusion of this datapoint, as it would be a form of self-incrimination, and he considered that there are no tools available for SMEs to deal with corruption and bribery. However, other members considered the argument of self-incrimination not valid after a court of law reaches a guilty verdict. In addition, they considered that it would be important for the transparency as a way to fight against corruption and bribery to keep this datapoint. They also considered that this is an SFDR PAI datapoint. A specific question was included in the consultation on this disclosure.

[9] Directive (EU) 2023/970, Article 9.3 and 9.4

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BC145. During the public consultation it surfaced that for the majority of the preparers the disclosure was feasible, but could possibly pose confidentiality issues. This confidentiality concern led some prepares to state that they would prefer to delete the disclosure despite it being feasible to disclose on. Banks and large undertakings confirmed that this disclosure is essential. To address the confidentiality issue that was also stressed by SMEs representatives during the workshop with SME representatives after the consultation, it was clarified that the primary purpose of VSME is the provision of data to a counterparty and making the VSME report public is up to the discretion of the reporting SME.

BC146. Based on the outcome of the public consultation, it was decided to leave the content of this disclosure the same as in the ED.

BC147. Additional guidance has been included to support the preparation of this disclosure in paragraphs 206 to 209 of the VSME.

Basic Module: deleted disclosure from the ED

Former Social Metric Disclosure B11 – Workers in the value chain, affected communities, consumers and end-users

BC148. The initial voluntary disclosure was removed from the VSME after the public consultation emphasised the challenge this datapoint presented for preparers. Additionally, the workshop with banking associations and SME representatives in September (2024) further confirmed that this deletion was appropriate. Nonetheless, the sustainability matters in ESRS Set 1 AR 16, including those originally covered under B11 have been integrated into the revised disclosure titled 'B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy' as discussed and approved by EFRAG SR TEG.

Narrative-Policies, Actions and Targets (PAT) Module

BC149. As explained in the introduction, the Narrative-PAT Module has been deleted from the VSME as a result of the public consultation feedback. Former disclosure N1 – Strategy: business model and sustainability – related initiatives, has been moved to disclosure C1 – Strategy: business model and sustainability – related initiatives (Comprehensive Module). Former disclosures N3 – Management of material sustainability matters, and N5 – Governance: responsibilities in relation to sustainability matters has been simplified, reformulated and included within B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy and C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy.

Comprehensive Module

BC150.

Disclosure	Paragraph reference	'If applicable'/ always to be reported on / may disclose
C1 – Strategy: Business Model and Sustainability – Related Initiatives	47 (a) (b) (c)	**Always to be reported on**
	47 (d)	**If applicable**
C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	48	**If applicable**
	49	**If applicable + may disclosure**
C3 – GHG reduction targets and climate transition	54, 56	**If applicable**
	55	**If applicable + may disclosure**

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C4 – Climate risks	57	**If applicable**
	58	**May disclosure**
C5– Workforce (General) Additional characteristics	59, 60	**May disclosure + threshold included**
C6 – Additional own workforce information - Human rights policies and processes	61 (a), 61(c)	**Always to be reported on**
	61(b)	**If applicable**
C7 – Severe negative human rights incidents	62(a)	**Always to be reported on**
	62(b)(c)	**If applicable**
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	63	**If applicable**
	64	**Always to be reported on**
C9 – Gender diversity ratio in governance body	65	**If applicable**

BC151. Paragraph 44 explains that the disclosures in this module have been included on the expectation that they reflect the data requests from lenders, investors and corporates to their SMEs clients and suppliers that are additional to the ones included in the Basic Module. This assumption has been confirmed during the public consultation.

BC152. As a starting point the SFDR PAI Table 1, the Benchmark Regulation and EBA Pillar 3 datapoints were considered for this Module. SFDR PAI in Table 2 were excluded for simplification reasons. While these indicators derive from the reporting obligations of investors, they have been considered valid as a reference with which to report relevant information on sustainability matters to all users. The outreach meetings (please refer to Annex 5) allowed for the identification of the same datapoints in the Comprehensive Module that could be added and others that could be removed (i.e. GHG and energy intensity or exclusions from benchmark alignment).

BC153. Some stakeholders requested additional data points, such as taxonomy eligibility and alignment. However, due to the complexity of such disclosures for SMEs and the lack of existing adapted simplified tools or methodologies, EFRAG SR TEG and the SRB decided to exclude the reference to an EU simplified taxonomy (see point on taxonomy) Please note that the EU Platform on Sustainable Finance is currently investigating an adapted methodology for SMEs[10].

BC154. In the public consultation, corporates (as clients of non-listed SMEs) confirmed that their needs correspond to the datapoints needed by financial market participants (SFDR PAI, Pillar 3), as this allows them to manage sustainability in their supply chain. The same is true for lenders, as the information is also used to assess the sustainability of SMEs when managing the lending book.

[10] European Commission, SMEs Relief Package, September 2023, page 16: 'In particular, simplified approaches, developed together with the Platform on Sustainable Finance, should allow non-listed SMEs to benefit from the use of the taxonomy'.

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BC155. Moreover, Appendix C (VSME) – dedicated to financial market participants that are users of the information produced using this Standard – helps users to visualise which disclosure requirements are SFDR, Benchmark Regulation or EBA Pillar 3 datapoints. Where possible, consistent definitions with Set 1 were kept as only a minimum level of language simplification was achieved (refer to Annex 7).

BC156. As explained in the introduction, the concept of materiality previously used in the ED for this Module has now been replaced with the 'if applicable' principle. This was done following the public consultation and is considered as a major simplification (see the point on materiality in the introduction).

BC157. The analysis below explains the changes that have been applied to this Module, both structurally and in terms of content.

Comprehensive Module – General information

C1 – Strategy: Business Model and Sustainability – Related Initiatives

BC158. This disclosure is new, it has been added following the public consultation. It is found in ten of the twelve questionnaires that have been analysed (see BC64). As described in the introduction, the Narrative-PAT Module was not supported in the public consultation (users did not find it useful as it was not comparable, and SMEs found it too complex). However, former disclosure N1 (Strategy: business model and sustainability-related initiatives) was mostly supported as perceived feasible by preparers and needed by users. Hence, SR TEG decided to keep this disclosure within the Standard. The SRB discussed whether the relocation in B1 – Basis for preparation would not result in excessive costs of preparation for SMEs. It finally decided to relocate this disclosure to the Comprehensive Module rather than the Basic Module.

BC159. While the disclosure was relocated, the content of former N1 remains the same as in the VSME ED, ensuring a meaningful description of the undertaking's business model and of the key elements of its strategy. However, contrary to ESRS Set 1, which refers to elements of the undertaking's strategy that relate to or impact sustainability matters, its business model and its value chain, the VSME refers in general to strategy. It was considered too complex for SMEs to specify the sustainability angle of its strategy. By describing its main products and/or services, markets and business relationships, the undertaking would already provide important information on the sustainability profile to their business partners.

BC160. Additional guidance to support the preparation of this disclosure can be found in paragraph 212 of the VSME.

C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

BC161. This disclosure is new, and it has been added following the public consultation. As described in the introduction and in the explanations provided under disclosure C2 – Practices, Policies and future initiatives for transitioning to a more sustainable economy, the SRB decided to keep elements of both former N3 – Management of material sustainability matters and former N5 – Governance responsibilities in relation to sustainability matters since they were considered important for users and feasible for preparers. C2 contains the narrative elements that complement the disclosure under B2 on practices, policies and future initiatives in place. This semi-narrative description is provided when the undertaking choses to use the Comprehensive Module. As a simplification, the undertaking may use the table in the guidance (paragraph 213 in the VSME) to describe practices and policies, whether there are targets associated and whether the senior level is in charge. The SRB considered that those elements would be better placed in the Comprehensive Module rather than in the Basic Module, which is the entry-level module.

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Comprehensive Module – Environmental Metrics

Consideration when reporting on GHG emissions under B3 (Basic Module)

BC162. The VSME excludes the requirement to report absolute Scope 3 emissions under the Basic Module (B3 – Energy and greenhouse gas emissions) given the complexity and lack of free available tools to SMEs. However, upon the recommendation of EFRAG SR TEG and the SRB, an entity-specific consideration related to GHG Scope 3 emissions was included in this module to encourage more advanced SMEs, or those in sectors where indirect emissions may be more relevant, to disclose such information. The public consultation confirmed the essential nature of Scope 3 emissions, while acknowledging the complexity for SMEs. After an initial consideration to limit Scope 3 emissions to high climate impact sectors, SR TEG members decided to keep the content of this disclosure as per the VSME ED.

BC163. In the guidance, methodological instructions were added and, as per SR TEG and the SRB's suggestions, sectors with the highest likelihood of having significant Scope 3 emissions were indicated.

BC164. The GHG protocol Scope 3 emission categories were deemed potentially too complex for SMEs, especially those that are smaller or lack experience in the reporting process. The EFRAG SRB accepted that incorporating Scope 1 and Scope 2 emissions could pose a significant challenge for those in the intended scope of this Standard, in considering their scale, resources, and maturity in reporting. Banks also indicated in outreaches that, in the absence of tailored methodologies for SMEs, they prefer to rely on proxies and indirect calculation to reduce additional preparatory costs for smaller clients. Therefore, Scope 3 was introduced as an element to be considered by undertakings as an additional entity-specific element for more experienced SMEs (in the Comprehensive Module). In its guidance, the VSME indicates the type of organisation for which Scope 3 emissions are likely to be significant. However, due to the diverse nature of SMEs and the challenges related to Scope 3, undertakings are advised to refer to the GHG Protocol and calculation guidance.

BC165. Additional guidance to support the preparation of this disclosure can be found in paragraphs 214 and 215 of the VSME.

C3 – GHG reduction targets and climate transition

BC166. Following the public consultation, SR TEG agreed with merging the former disclosures BP3 (GHG emissions reduction target) and BP4 (Transition plan for climate change mitigation), and the title was adapted accordingly. In addition, this disclosure was requested in seven of the twelve questionnaires analysed (see BC64), and in the public consultation, users (banks) highlighted the relevance of this disclosure for ESG risk management purposes according to 35(a) in EBA/CP/2024/02 with regard to portfolio alignment.

BC167. This disclosure provides guidance for undertakings opting to enhance their Basic Module B3 reporting. The EFRAG SRB agreed to include Scope 3 GHG emission reduction targets when they do exist, in line with the consideration when reporting on GHG emissions under B3 (Basic Module) in contrast to the initial recommendation by EFRAG SR TEG. Following the public consultation, paragraph 54 was enhanced and refined to align with the sector-agnostic ESRS on absolute value; make the requirements applicable to SMEs that have already set targets and are dependent on their activities; require more precise information on targets (target year, base year, units, etc.), in addition to the split by scope, to guide SMEs in their reporting; and require information on the actions connected to emission reduction, given their importance in establishing an emission reduction trajectory.

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BC168. The datapoints on the transition plan are aligned with the Climate Benchmark Regulation (see Annex 7). In addition, in the public consultation users (banks) highlighted the relevance of this datapoint for ESG risk management according to 23(a)(ix) and 72(e) of EBA/CP/2024/02. Compared to the VSME ED, it was decided after the public consultation, following users' requests, that the disclosure requirements in the transition plan should only be applicable to high climate impact sectors. In response to a request to address the complexity of transition plan requirements, these were made voluntary. Users and other respondents to the public consultation deemed it important to extend the requirement to cases in which undertakings do not have a transition plan in place yet to allow them to indicate if and when the adoption would happen. Additionally, a connection was created between transition plans and their contribution to GHG emission reduction. Preparers also recommended to make this disclosure more proportionate by removing the reference to the Paris Agreement.

BC169. A simplified explanation of the role of the transition plan for climate change mitigation, along with the characteristics to create a credible transition pathway, has been provided in the guidance. To enhance simplicity, this disclosure requirement does not consider potential locked-in GHG emissions and the reference to the Taxonomy Regulation.

BC170. The guidance supporting the preparation of this disclosure was strengthened (with additional material from SBTi for SMEs) on target-setting and target characteristics to ensure credibility. The guidance now also includes a simple explanation of the emission reduction challenges and the steps that undertakings can take to achieve them, with a few practical examples, as per a request by field-test respondents. In addition, after the publication of the VSME by the European Commission, EFRAG will work on an IG.

BC171. Additional guidance to support the preparation of this disclosure can be found in paragraphs 216 to 227 of the VSME.

C4 – Climate risks

BC172. This disclosure requirement was originally created as per the EBA Pillar 3 ESG requirements on information regarding physical risks of banks' clients for risk management purposes (see Annex 7 for details) and in alignment with the disclosure of anticipated financial impacts from material physical risks outlined in ESRS Set 1. This disclosure was also requested in nine of the twelve questionnaires analysed (refer to BC64), and in the public consultation, users (banks) highlighted the relevance of this disclosure from a Pillar 2 perspective according to 23(a)(i)(iii) (vi), (72)(g)(h), (31)(a), EBA/CP/2024/02. After the public consultation, the disclosure was redrafted to respond to concerns of preparers and users, which both deemed monetary information to be challenging to report. While users recommended replacing the related requirements with geolocation information, preparers advocated for a predominantly narrative type of disclosure, leaving to the users the role of assessing their own clients' risks. SR TEG eventually opted for the latter option, agreeing with the EFRAG Secretariat on the fact that the VSME is devised to raise awareness in managing environmental risks (among others) and that, by providing only geolocation information, SMEs would remain passive in assessing those risks. The current datapoints under paragraph 57 are the result of a proposal by SR TEG, which highlighted that the information of this disclosure should also be related to the change management of the SMEs themselves and that, therefore, a more approachable methodology should be provided. SR TEG agreed to add a datapoint to allow SMEs the possibility to describe their climate-related hazards and transition events. In addition, SR TEG also suggested to use the term 'exposure and sensitivity' instead of 'vulnerability' in order to be aligned with the sector-agnostic ESRS. The SRB supported the approach and the decisions to change the title from 'Physical risks from climate change' to 'Climate risks'. Finally, two additional datapoints stemming from the public consultation, namely on insurance coverage and building energy performance, were eventually removed at SR TEG as the first one exceeding Set 1 and the second one was not fundamental to users.

BC173. Guidance in paragraphs 228 through 230 of the VME offers definitions and examples of climate change-related physical risks. Upon SR TEG's request, further guidance was provided on the terms 'climate-related hazards', 'climate-related transition events', and 'gross climate-related risks'.

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Comprehensive Module – Social Metrics

C5 – Workforce (General) Additional characteristics

BC174. This disclosure requirement was introduced following feedback from the public consultation.

BC175. During the consultation, users requested the inclusion of the percentage of female-to-male staff in managerial roles. The relevance of this datapoint was later confirmed in the workshop with banking associations in September (2024) and approved by EFRAG SR TEG with the condition that it be voluntary and that a 50-employee threshold be applied.

BC176. Another request from the public consultation was to include the percentage of non-employees. However, some SR TEG members expressed concerns about the complexity of this datapoint for the Basic Module. As a result, it was moved to the Comprehensive Module as a voluntary disclosure. EFRAG SR TEG approved this adjustment with the condition of clarifying the terminology, opting for 'number of self-employed without personnel that are working for the undertaking', and temporary workers provided by undertakings primarily engaged in 'employment activities' instead of 'non-employees'. The EFRAG SRB approved the disclosure with the additional guidance on factors or aspects that the SMEs should consider when deciding to disclose this 'may' datapoint.

BC177. The two datapoints outlined above reference ESRS Set 1 and were adapted to align with the specific scope and requirements of SMEs.

BC178. Additional guidance to support the preparation of this disclosure can be found in paragraphs 231 to 236 of the VSME.

C6 – Additional own workforce information - Human rights policies and processes

BC179. This disclosure was elaborated based on the previous 'BP 7 – Alignment with internationally recognised instruments' and 'BP 8 – Processes to monitor compliance and mechanisms to address violations'; both SDFR PAI metrics from Table 1 (reference 10 for violations and reference 11 for lack of processes and compliance mechanisms to monitor compliance with UNGP and OECD MNE). This disclosure was requested in six of the twelve questionnaires analysed (refer to BC64). Feedback from the public consultation respondents and field-test participants, including preparers, users and others, indicated that the complexity of these disclosures was excessive for SMEs. As a result, the disclosures were streamlined into a simplified format that was user-friendly and made the translation of the datapoint into information that could be easily aggregated for its users. The new formulation includes a question on whether a code of conduct or human rights policy exists for the undertaking's own workforce, followed by a non-exhaustive list of human rights topics that such a code of conduct or a human rights policy can address; the human rights included are anchored in the SFDR PAIs in order to facilitate the connection with the sustainable finance regulation. It also contains a question about the existence of a complaints handling mechanism for the undertaking's own workforce. This proposal was approved at SR TEG and received strong support in the post-consultation workshops with banking associations and SME representatives held in September (2024).

BC180. Some SRB members raised concerns regarding the scope of the disclosure and requested to expand the contents of C6 to workers in the value chain, affected communities, and consumers and end users, while others refuted such modifications. Differing views among EFRAG SRB members resulted in a proposal from the EFRAG Secretariat to keep C6 unchanged while inserting additional guidance related to value chain workers, affected communities and end consumers for B2. The proposal was endorsed by the EFRAG SRB.

BC181. Additional guidance to support the preparation of this disclosure can be found in paragraph 237 of the VSME.

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C7 – Severe human rights incidents

BC182. Following a process similar to that for developing 'C6 – Human rights policies and processes', this disclosure requirement was adapted from the previous 'BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO Declaration and the International Bill of Human Rights)'. This disclosure was requested in three of the twelve questionnaires analysed (refer to BC64). Feedback from the public consultation and field test coming from preparers, users and others highlighted that the disclosure's complexity was disproportionate for SMEs. Consequently, the text was streamlined into a simplified format comprising a question on the existence of confirmed human rights incidents along with a list of relevant human rights topics. This proposal was approved by EFRAG SR TEG and received strong support from banking associations and SME representatives alike during workshops held in September (2024). Additionally, the disclosure includes a question on human rights incidents involving other affected stakeholder groups, namely workers in the value chain, affected communities and consumers and end users that was inserted as part of SR TEG approval process under the formulation of 'if the undertaking is aware of confirmed incidents' in order to make it proportionate to the resources that a SME has.

BC183. Additional guidance to support the preparation of this disclosure can be found in paragraph 238 of the VSME.

Comprehensive Module – Governance Metrics

C8 – Revenues from certain sectors and exclusion from EU reference benchmarks

BC184. This datapoint requires the undertaking to disclose whether they are active and the related revenues from certain sectors. When comparing this disclosure with ESRS Set 1, the taxonomy part of it was explicitly excluded from the methodological approach in the Comprehensive Module (Annex 7). In addition, this disclosure was requested in five of the twelve questionnaires analysed (refer to BC64).

BC185. The sectors have been identified as carrying sustainability risks according to defined criteria based on certain legislation applicable to financial institutions. Therefore, lenders and investors require this information along with large undertakings, which also confirmed this datapoint during the public consultation.

BC186. During the public consultation, banks requested to include an additional datapoint for the exclusion from EU reference benchmarks. This additional datapoint was further confirmed during the post-consultation workshop. It was then agreed at SR TEG and the SRB to include this additional datapoint in the Standard within C8 – Revenues from certain sectors and exclusion from EU reference benchmarks.

BC187. Additional guidance to support the preparation of this disclosure is in paragraphs 239 to 241 of the VSME.

C9 – Gender diversity ratio in governance body

BC188. This disclosure remains unchanged from the ED and was requested in six of the twelve questionnaires analysed (refer to BC64). This datapoint was subject to significant debate, with those disagreeing with this datapoint arguing that SMEs are mostly family businesses and thus have a limited choice on gender diversity. Others noted that there is no legal binding requirement in the existing sustainability acquis that requests SMEs to disclose their gender diversity ratio in governance bodies, as SMEs are not in the scope of Directive (EU) 2022/2381 to improve the gender balance among directors of listed companies and related measures. Those that disagreed argued that, as for larger companies, female family members could take part in the governance bodies of these businesses. In addition, they consider that transparency on important matters such as gender diversity and inclusion are important for users. Finally, it was agreed to include this datapoint in this Module, it being an SFDR datapoint subject to consultation.

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BC189. When drafting the datapoint, two possible alternatives for the calculation of the metric have been considered. The SFDR uses the metric of number of female members to male members. The more generally used and simpler formula is the number of female members (or male members) to the total number of members of the governance bodies. EFRAG adopted the first one to be aligned with the SFDR and the sector-agnostic standards as adopted by the European Commission on 31 July 2023.

BC190. During the public consultation the same aforementioned issues were transmitted by SME associations, which asked to delete this disclosure as family-owned undertakings cannot apply it. Despite this, banks deemed this datapoint as essential (SFDR datapoint). The need for this disclosure was reiterated during the banking associations workshop: however, the banks asked to clarify that if the SME does not have a governance body in place, it does not have to report on this disclosure. This disclosure remained an issue for SME associations but was decided to be kept given that it was an SFDR datapoint.

BC191. Additional guidance to support the preparation of this disclosure is available in paragraphs 242 to 244 of the VSME. This guidance remains unchanged in the VSME.

Comprehensive Module deleted disclosures from the ED

Former Environmental Disclosure BP6 – Hazardous waste and radioactive waste ratio

BC192. SR TEG and the SRB agreed to include the elements of this disclosure within disclosure B7 – Resource use, circular economy and waste management. During the public consultation, it surfaced that hazardous waste, and specifically radioactive waste, was not relevant/ applicable for prepares, while it was confirmed to be essential for banks and large undertakings. To streamline the Standard and reduce redundancies, it was decided to only request information on hazardous waste (which included radioactive waste) within disclosure B7. At SR TEG, it was agreed to make radioactive waste explicit in the guidance to ensure alignment with SFDR PAI datapoints. Former disclosure BP6 was seen as redundant and was decided to be deleted.

Former Social Metric Disclosure BP10 – Work-life balance

BC193. SR TEG approved the deletion of the initial disclosure following feedback from the public consultation, which emphasised the datapoint's limited relevance. This decision was further supported during workshops held with banking associations and with SME representatives in September (2024).

Former Social Metric Disclosure BP11 – Number of apprentices

BC194. SR TEG approved the deletion of the initial disclosure after the public consultation underscored its lack of relevance. The decision was also validated by feedback received during workshops held with banking associations and held with SME representatives in September (2024).

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Appendix A: Defined Terms

BC195. Concerning the Defined Terms, EFRAG Secretariat has introduced the terms that were not defined in the text of the VSME ED and where possible, i.e. compatibly with the need to simplify the language and increase understandability, the definitions have been aligned to the ones already present in ESRS Delegated Act Set 1. Some definitions, which are not defined in ESRS Set 1, have been introduced following explicit requests by EFRAG SR TEG and SRB members. This is explained in the third column "Aligned with ESRS Delegated Act Set 1" of the table below, which illustrates which definitions are fully aligned with Set 1 and which deviate from it.

Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Accident prevention	Accident prevention refers to the policies and initiatives to prevent workplace accidents and ensure the safety and well-being of employees. This not only includes measures to reduce physical risks but also involves fostering a safe and inclusive work environment free from discrimination and harassment.	Not aligned, but inserted following feedback from the public consultation
Actions	Actions refer to (i) actions and actions plans (including transition plans) that are undertaken to ensure that the undertaking delivers against targets set and through which the undertaking seeks to address material impacts, risks and opportunities; and (ii) decisions to support these with financial, human or technological resources.	Fully aligned
Affected communities	People or group(s) living or working in the same area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the undertaking's operations (local communities) to those living at a distance. Affected communities include actually and potentially affected indigenous peoples.	Fully aligned
Biodiversity-sensitive Area	Biodiversity-sensitive areas include: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139.	Fully aligned
Business Conduct	The following matters are collectively referred to as 'business conduct or business conduct matters': (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices,	Fully aligned

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Appendix A: Defined terms

Defined term	Definition	Aligned with ESRS Delegated Act Set 1
	especially with regard to late payment to small and medium-sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities.	
Child Labour	Work that deprives children of their childhood, potential, and dignity and harms their physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and/or interferes with their schooling (by preventing them from the opportunity to attend school).	Aligned with Set 1, but shortened for simplification
Collective bargaining	All negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more trade unions or, in their absence, the representatives of the workers duly elected and authorised by them in accordance with national laws and regulations, on the other, for: i) determining working conditions and terms of employment; and/or ii) regulating relations between employers and workers; and/or regulating relations between employers or their organisations and a workers' organisation or workers' organisations.	Fully aligned
Corruption	Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.	Fully aligned
Consumers	Individuals who acquire, consume or use goods and services for personal use, either for themselves or for others, and not for resale, commercial or trade, business, craft or profession purposes.	Fully aligned
Classified information	EU classified information as defined in Council Decision of 23 September 2013 on the security rules for protecting EU classified information (2013/488/EU) or classified by one of the Member States and marked as per Appendix B of that Council decision. EU classified information means any information designated by a EU security classification, of	Aligned with Set 1, but second paragraph added to further clarify the definition

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Appendix A: Defined terms

Defined term	Definition	Aligned with ESRS Delegated Act Set 1
	which the unauthorised disclosure could cause varying degrees of prejudice to the interests of the European Union or of one or more of the Member States. Classified information may be classified according to four levels: top secret, secret, confidential, restricted (based on the definition from the Council Decision).	
Circular economy principles	The European circular economy principles are usability; reusability; repairability; disassembly; remanufacturing or refurbishment; recycling; recirculation by the biological cycle; other potential optimisation of product and material use.	Fully aligned
Climate-change adaptation	The process of adjustment to actual and expected climate change and its impacts.	Fully aligned
Climate-related physical risks	Risks resulting from climate change that can be event-driven (acute) or from longer-term shifts (chronic) in climate patterns. Acute physical risks arise from particular hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from longer-term changes in the climate, such as temperature changes, and their effects on rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.	Fully aligned
Direct GHG emissions (Scope 1)	Direct GHG emissions from sources that are owned or controlled by the undertaking.	Fully aligned
Discrimination	Discrimination can occur directly or indirectly. Direct discrimination occurs when an individual is treated less favourably by comparison to how others, who are in a similar situation. Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics.	Fully aligned
Employee	An individual who is in an employment relationship with the undertaking according to national law or practice.	Fully aligned
End-users	Individuals who ultimately use or are intended to ultimately use a particular product or service.	Fully aligned
Forced Labour	All work or service which is exacted from any person under the threat of penalty and for which the person has not offered himself or herself voluntarily according to the ILO Forced Labour Convention, 1930 (No.29). The term encompasses all situations in which persons are coerced by any means to perform work.	Not aligned, but inserted following feedback from the public consultation
Grievance mechanism	Any routinized, state-based or non-state-based, judicial or non-judicial processes through which stakeholders can raise grievances and seek	Fully aligned

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
	remedy. Examples of state-based judicial and non-judicial grievance mechanisms include courts, labour tribunals, national human rights institutions, National Contact Points under the OECD Guidelines for Multinational Enterprises, ombudsperson offices, consumer protection agencies, regulatory oversight bodies, and government-run complaints offices. Non-state-based grievance mechanisms include those administered by the undertaking, either alone or together with stakeholders, such as operational-level grievance mechanisms and collective bargaining, including the mechanisms established by collective bargaining. They also include mechanisms administered by industry associations, international organisations, civil society organisations, or multi-stakeholder groups. Operational-level grievance mechanisms are administered by the organisation either alone or in collaboration with other parties and are directly accessible by the organisation's stakeholders. They allow for grievances to be identified and addressed early and directly, thereby preventing both harm and grievances from escalating. They also provide important feedback on the effectiveness of the organisation's due diligence from those who are directly affected. According to UN Guiding Principle 31, effective grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning. In addition to these criteria, effective operational-level grievance mechanisms are also based on engagement and dialogue. It can be more difficult for the organisation to assess the effectiveness of grievance mechanisms that it participates in compared to those it has established itself.	
Greenhouse Gases (GHG)	For the purposes of this Standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO_2); methane (CH_4); nitrous oxide (N_2O); Nitrogen trifluoride (NF_3); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF_6).	Fully aligned
Governance	The governance is the system of rules, practices and processes by which a company is directed and controlled.	Not aligned, but inserted following a request from an EFRAG SRB member
Gross greenhouse gas (GHG) emissions	Gross greenhouse gas (GHG) emissions are total GHG emissions released by the undertaking into the atmosphere, without considering any deductions for carbon removals or other adjustments.	Not aligned, but inserted following feedback from the public consultation

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Hazardous waste	Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste.	Fully aligned
Human trafficking	The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.	Not aligned but inserted following feedback from the public consultation.
Incident	A legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms.	Fully aligned
Indirect GHG emissions (Scope 2)	Indirect emissions are a consequence of the operations of the undertaking but occur at sources owned or controlled by another company. Scope 2 GHG emissions are indirect emissions from the generation of purchased or acquired electricity, steam and heat, or cooling consumed by the undertaking.	Fully aligned
Impact	Impact refers to the effect an organisation has or could have on the economy, environment, and people, including effects on their human rights, as a result of the organization's activities or business relationships. The impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, direct or indirect, and reversible or irreversible. These impacts indicate the organization's contribution, negative or positive, to sustainable development. The impacts on the economy, environment, and people are interrelated. The organization's impacts on the environment refer to the impacts on living organisms and non-living elements, including air, land, water, and ecosystems. An organization can have an impact on the environment through, for example, its use of energy, land, water, and other natural resources. The organization's impacts on people refer to the impacts on individuals and groups, such as communities, vulnerable groups, or society. This includes the impacts the organization has on people's human rights. An organization can have	Not aligned, but inserted following feedback from the public consultation

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
	an impact on people through, for example, its employment practices (e.g. the wages it pays to employees), its supply chain (e.g. the working conditions of workers of suppliers), and its products and services (e.g. their safety or accessibility).	
Land-use	The human use of a specific area for a certain purpose (such as residential; agriculture; recreation; industrial, etc.). Influenced by land cover (grass, asphalt, trees, bare ground, water, etc). Land-use change refers to a change in the use or management of land by humans, which may lead to a change in land cover.	Simplified version (land cover made explicit)
Location-based Scope 2 emissions	Emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company, calculated using the location-based 'allocating' method, which allocates generator emissions to end-users. They reflect the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).	Not present in Set 1 but added following the public consultation.
Nature-oriented area	A "nature-oriented area" is an area dedicated primarily to nature preservation or restoration. They can be located on-site and include elements like roof, façade, water drainages designed, to promote biodiversity. Nature-oriented areas can also be located outside the organisation site provided that the area is owned or (co-)managed by the organisation and is primarily dedicated to promoting biodiversity. (Adapted from: Source: EMAS regulation)	Not present in Set 1 but requested by an SR TEG member
Near (Biodiversity Sensitive Area)	Near, in the context of B5 – Biodiversity, shall refer to an area that is (partially) overlapping or adjacent to a biodiversity sensitive area.	Not present in Set 1 but added following the public consultation.
Own workforce/own workers	Employees who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78).	Fully aligned

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Pay	The ordinary basic or minimum wage or salary and any other remuneration, whether in cash or in kind which the worker receives directly or indirectly ('complementary or variable components'), in respect of his/her employment from his/her employer. 'Pay level' means gross annual pay and the corresponding gross hourly pay. 'Median pay level' means the pay of the employee that would have half of the employees earn more and half less than they do.	Fully aligned
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a sustainability issue. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is implemented through actions or action plans. For example, undertakings with less resources may have few (or no) policies formalised in written documents, but this does not necessarily mean they do not have policies. If the undertaking has not yet formalised a policy but has implemented actions or defined targets through which the undertaking seeks to address sustainability topics and subtopics, it shall disclose them.	Partially aligned. Additional examples added.
Radioactive waste	Any radioactive material in gaseous, liquid, or solid form, for which no further use is foreseen, as per Article 3(7) of Council Directive 2011/70/Euratom11.	Not present in Set 1 but added following the public consultation.
Recordable work-related accident/ Recordable work-related injury or ill health	A work-related accident is an event that leads to physical or mental harm therefore to injury or ill health. It happens whilst engaged in an occupational activity or during the time spent at work. Recordable means diagnosed by a physician or other licensed health care professionals. Work-related injury or ill health can result in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or loss of consciousness. Injuries that do not require medical treatment beyond first aid are generally not recordable.	First definition is adapted from Set 1 definition of "work-related incidents" Second definition is aligned with Set 1, but shortened and adapted for simplification

[11] Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.	Fully aligned
Renewable Energy	Energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas[12].	Fully aligned
Sealed area	A sealed area means any area where the original soil has been covered (such as roads) making it impermeable. This non-permeability can create environmental impacts. (Source: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R1221-20230712)	Not present in Set 1, but requested by an SR TEG member
Sensitive information	Sensitive information as defined in Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund. The definition provided in the same Council of 29 April 2021: Sensitive information means information and data, including classified information, that is to be protected from unauthorised access or disclosure because of obligations laid down in Union or national law or in order to safeguard the privacy or security of a natural or legal person.	Aligned with Set 1, but second paragraph added to further clarify the definition
Site	The location of one or more physical installations. If there is more than one physical installation from the same or different owners or operators and certain infrastructure and facilities are shared, the entire area where the physical installation are located may constitute a site.	Fully aligned
Targets	Measurable, outcome-oriented and time-bound goals that the SME aims to achieve in relation to material sustainability topics and subtopics. They may be set voluntarily by the SME or derive from legal requirements on the undertaking.	Fully aligned

[12] Article 2(1) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Time horizons	When preparing its sustainability report, the undertaking shall adopt the following time horizons: for the short-term time horizon, one year; for the medium-term time horizon, from two to five years; and for the long-term time horizon, more than five years.	Not present in Set 1 (to be defined by the large undertakings) but added following the public consultation.
Training	Initiatives put in place by the undertaking aimed at the maintenance and/or improvement of skills and knowledge of its own workers. It can include different methodologies, such as on-site training, and online training.	Fully aligned
Value Chain	The full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. A value chain encompasses the activities, resources and relationships the undertaking uses and relies on to create its products or services from conception to delivery, consumption and end-of- life. Relevant activities, resources and relationships include: a) those in the undertaking's own operations, such as human resources; b) those along its supply, marketing and distribution channels, such as materials and service sourcing and product and service sale and delivery; and c) the financing, geographical, geopolitical and regulatory environments in which the undertaking operates. Value chain includes actors upstream and downstream from the undertaking. Actors upstream from the undertaking (e.g. suppliers) provide products or services that are used in the development of the undertaking's products or services. Entities downstream from the undertaking (e.g., distributors, customers) receive products or services from the undertaking.	Aligned – deleted 'ESRS use the term "value chain" in the singular, although it is recognised that undertakings may have multiple value chains'
Wage	Gross wage, excluding variable components such as overtime and incentive pay, and excluding allowances unless they are guaranteed.	Fully aligned
Water consumption	The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period.	Fully aligned
Water withdrawal	The sum of all water drawn into the boundaries of the undertaking from all sources for any use over the course of the reporting period.	Fully aligned

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Defined term	Definition	Aligned with ESRS Delegated Act Set 1
Worker in the value chain	An individual performing work in the value chain of the undertaking, regardless of the existence or nature of any contractual relationship with the undertaking. In the ESRS, the scope of workers in the value chain include all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking. This includes impacts that are connected to the undertaking's own operations, and value chain, including through its products or services, as well as through its business relationships. This includes all workers who are not in the scope of 'Own Workforce' ('Own Workforce' includes people who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in employment activities. (NACE Code N78).	Fully aligned

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Annex 1: VSME Exposure Draft (ED) January 2024

Objective of this [draft] Standard and to which undertakings it applies

1. The objective of this voluntary [draft] Standard is to support micro-, small- and medium-sized undertakings in:

   (a) contributing to a more sustainable and inclusive economy;

   (b) improving the management of the sustainability issues they face, i.e., environmental and social challenges such as pollution, workforce health and safety. This will support their competitive growth and enhance their resilience in the short-, medium- and long-term;

   (c) providing information that will help satisfy data demand from lenders/credit providers and investors, therefore helping undertakings in their access to finance;

   (d) providing information that will help satisfy the data demand needs of large undertakings requesting sustainability information from their suppliers.

2. This [draft] Standard is voluntary and applies to undertakings whose securities are not admitted to trading on a regulated market in the European Union (not listed). [Article 3 of Directive 2013/34/EU] defines and distinguishes three categories of small and medium-sized undertakings based on their balance sheet total, their net turnover and their average number of ***employees*** during the financial year.

   (a) An undertaking is micro if it does not exceed two of the following thresholds:

      i. €350,000 in balance sheet total,

      ii. €700,000 in net turnover, and

      iii. 10 employees.

   (b) An undertaking is small if it does not exceed two of the following thresholds:

      i. €4 million in balance sheet total,

      ii. €8 million in net turnover, or

      iii. an average of 50 employees.

   (c) An undertaking is medium if it does not exceed two of the following thresholds:

      i. €20 million in balance sheet total,

      ii. €40 million in net turnover, and

      iii. 250 employees.

3. These undertakings fall outside the scope of the Corporate Social Reporting Directive (CSRD) but are encouraged to use this [draft] Standard to prepare and share with whomever such sustainability information may concern. This [draft] Standard covers the same sustainability issues as the European Sustainability Reporting Standards (ESRS) for large undertakings. However, it is based upon the key concept of proportionality and therefore takes into account micro-, small- and medium-sized undertakings' fundamental characteristics. Micro undertakings are welcome to use only certain parts of this [draft] Standard as highlighted in paragraph 5 (a).

4. Consistency with ESRS for large undertakings has been carefully considered in the preparation of this [draft] Standard, while defining proportionate requirements. This [draft] Standard has no legal authority, unlike the ESRS for large undertakings. It provides undertakings that are outside the scope of the CSRD (see paragraph 2) with a voluntary tool for sustainability reporting.

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Modules that constitute this [draft] Standard

5. This [draft] Standard includes three modules that the undertaking can use as the basis for preparation of its sustainability report:

   (a) **Basic Module**: Disclosures B 1, B 2 and Basic Metrics (B 3 – B 12). This module is the target approach for micro-undertakings and constitutes a minimum requirement for other undertakings. Materiality analysis is not required, but disclosures B 3-B 12 are to be provided when they are applicable to the undertaking's specific circumstances.

   (b) **Narrative-Policies, Actions and Targets (PAT) Module**: This module defines narrative disclosures (N1 – N5) in relation to Policies, Actions and Targets (PAT), which are to be reported in addition to disclosures B 1-B 12 if the undertaking has them in place. This module is suggested to undertakings that have formalised and implemented the PAT. Materiality analysis is required in order to disclose which of the sustainability matters in Appendix B are relevant for the undertaking's business and organisation (see Principles of Materiality below).

   (c) **Business Partners (BP) Module**: This module sets datapoints to be reported in addition to disclosures B 1-B 12, which are likely to be included in data requests from lenders, investors and corporate clients of the undertaking. Materiality analysis is required in order to disclose which of the sustainability matters in Appendix B are relevant for the undertaking's business and organisation (see Principles of Materiality below). If the undertaking prepares also the Narrative (PAT) Module, the material matters are disclosed only once.

   Paragraph 21 below illustrates the available options for the preparation of a sustainability report using this [draft] Standard by adopting one or more of these modules. Once chosen, a module shall be complied with in its entirety (with flexibility allowed under paragraph 19), providing information in each disclosure that is applicable to the undertaking's specific circumstances or it is considered relevant to the undertaking's business and organisation.

6. Applying the Basic Module is a prerequisite for applying the Narrative-PAT and/or the Business Partners Modules.

7. Appendix A *Defined terms* includes the definitions of the terms used in this [draft] Standard. Throughout VSME ED, the terms that are defined in the glossary of definitions (Appendix A) are put in ***bold italic***, except when a defined term is used more than once in the same paragraph.

Principles for the preparation of the sustainability report (Basic Module, Narrative-PAT Module, Business Partners Module)

8. This section incudes principles that shall be applied when the undertaking prepares its sustainability report using any of the three modules described above.

Complying with this Standard

9. This [draft] Standard sets requirements that allow the undertaking to provide relevant information on:

   (a) how its business has had and is likely to have a negative impact on people or on the environment; and

   (b) which and how environmental and social issues have affected or are likely to affect its financial position, performance and cash flows.

10. The sustainability report shall provide information that is relevant, faithful, comparable, understandable and verifiable.

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11. Depending on the type of activities carried out by the undertaking, the inclusion of additional information (metrics and/or narrative disclosures) not covered in this [draft] Standard is appropriate in order to disclose issues that are common in the undertaking's sector, as this supports the preparation of relevant, faithful, comparable, understandable and verifiable information.

Preparation on a consolidated basis

12. If the undertaking is a parent company of a group, it is recommended that it prepares its sustainability report on a consolidated basis, including the information of its subsidiaries.

Timing and location of the sustainability report

13. The sustainability report shall be prepared on an annual basis. It shall be available for issuance at the same time as the financial statements if they are prepared.

14. The undertaking may present its sustainability report in a separate section of the management report if the latter is required by applicable law and regulations or if the management report is prepared voluntarily. Otherwise, the undertaking may present its sustainability report in a different document.

15. To avoid publishing the same information twice, the undertaking may refer in its sustainability report to disclosures published in other documents that can be accessed at the same time as the sustainability report.

Classified and sensitive information and information on intellectual property, know-how or results of innovation

16. When the provision of the disclosures in this [draft] Standard would require disclosing classified or ***sensitive information***, the undertaking may omit such information, even if it is considered material. The undertaking may omit such classified or sensitive information if:

    (a) the information has commercial value because it is secret; and

    (b) its publication will likely negatively affect the financial performance or position of the undertaking.

    If the undertaking decides to omit such information, it shall simply state that is the case under Disclosure B 1 (see paragraph 21).

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Basic Module

17. The undertaking shall report on its environmental, social and ***business conduct*** issues using the B 1-B 12 disclosures below. Comparative information in respect of the previous year shall be included in the report except for metrics being disclosed for the first time. The inclusion of comparative information shall begin the second year of reporting and continue henceforth.

18. Disclosures B 1-B 12 are to be reported, and no materiality analysis is needed. Certain disclosures only apply to specific circumstances. In particular, the following instructions specify that, in these circumstances, the information is to be reported only if considered 'applicable' by the undertaking. When one of these disclosures is omitted, it is assumed to be not applicable.

19. The undertaking may complement the metrics from B 3 to B 12 with additional qualitative and/or quantitative information, where appropriate, in accordance with paragraph 11 above. The undertaking that wants to provide more comprehensive information may also integrate the metrics required from B 3 to B 12 with disclosures, selecting them from the Narrative-PAT Module and/or from the Business Partners Module.

20. Instructions supporting the preparation of metrics B 3-B 12 are available in the Basic Module guidance, which is found on pages 19 through 34 of this [draft] Standard.

Disclosure B 1 – Basis for preparation

21. The undertaking shall disclose:

    (a) which of the following options it has selected in the preparation of its sustainability report using this [draft] Standard:

        i. OPTION A: Basic Module (only);

        ii. OPTION B: Basic Module and Narrative-PAT Module;

        iii. OPTION C: Basic Module and Business Partners Module; or

        iv. OPTION D: Basic Module, Narrative-PAT Module and Business Partner Module;

    (b) whether the sustainability report has been prepared on a consolidated basis (i.e., the report includes information of the undertaking and its subsidiaries) or on an individual basis (i.e., the report is limited only to the information of the undertaking); and

    (c) the list of the subsidiaries, including their registered address[1] covered in the consolidated sustainability report.

Disclosure B 2 – Practices for transitioning towards a more sustainable economy

22. The undertaking may briefly describe specific practices for transitioning towards a more sustainable economy in case it has them in place. Such practices include what the undertaking does to reduce its negative impacts and to enhance its positive impacts on people and on the environment in order to contribute to a more sustainable economy. Practices in this context shall not include philanthropic activities (e.g., donations) but rather, for instance, initiatives to improve working conditions and equal treatment in the workplace, sustainability ***training*** for the undertaking's workforce, collaboration with universities related to sustainability projects, efforts to reduce the undertaking's water and electricity consumption or to prevent pollution, and initiatives to improve product safety.This disclosure does not apply when the undertaking prepares its sustainability report using the Narrative-PAT Module.

[1] The registered address is the official address of the undertaking. Providing the registered address is a legal requirement, and it is available on public record.

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Basic metrics – Environment

B 3 – Energy and greenhouse gas emissions

23. The undertaking shall report on its impacts on climate by disclosing its energy usage and greenhouse gas emissions as requested in the following paragraphs.

24. The undertaking shall disclose its total energy consumption in MWh, with a breakdown between:

    (a) fossil fuels; and

    (b) electricity as reflected in utility billings, along with a breakdown between renewable and non-renewable sources if available.

25. The undertaking shall disclose its estimated ***gross greenhouse gas (GHG) emissions*** in tons of CO2 equivalents (tCO2eq) considering the content of the GHG Protocol Corporate Standard, including:

    (a) the Scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and

    (b) the location-based Scope 2 emissions in tCO_2eq (i.e., emissions from the generation of purchased energy).

B 4 – Pollution of air, water and soil

26. The undertaking shall disclose, if applicable, the pollutants (with respective amounts) it emits to air, water and soil in its own operations, that it is required by law to report to competent authorities (e.g. under the Industrial Emissions Directive and the European Pollutant Release and Transfer Register) or that it already reports according to an Environmental Management System such as Eco-Management and Audit Scheme (EMAS). If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.

B 5 – Biodiversity

27. The undertaking shall disclose, if applicable, metrics related to its impacts on ***biodiversity***, ecosystems and ***land-use*** as requested in the following paragraphs.

28. The undertaking shall disclose the number and area (in hectares) of sites that it owns, has leased, or manages in or near ***biodiversity*** sensitive areas.

29. The undertaking may disclose metrics related to ***land-use*** such as:

    (a) total use of land;

    (b) total ***sealed area***;

    (c) total ***nature-oriented area*** on-site; and

    (d) total ***nature-oriented area*** off-site.

B 6 – Water

30. The undertaking shall disclose its total ***water withdrawal***, i.e., the amount of water drawn into the boundaries of the organisation (or facility); in addition, the undertaking shall separately present the amount of water withdrawn at sites located in areas of high water - stress.

31. If applicable, the undertaking shall disclose its ***water consumption***, calculated as the difference between its ***water withdrawal*** and water discharge from its production processes.

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B 7 – Resource use, circular economy and waste management

32. The undertaking shall disclose how it manages resource use, its waste management practices and whether it applies ***circular economy principles***.

33. The disclosure shall include:

    (a) if the undertaking operates manufacturing, construction and/or packaging processes: the recycled content in the products (goods and materials) and their packaging produced by the undertaking;

    (b) if the undertaking operates manufacturing, construction and/or packaging processes: rates of recyclable content in the products and their packaging produced by the undertaking;

    (c) the total annual generation of waste in units of weight (preferably) or volume broken down by type (non-hazardous and hazardous); and

    (d) the total annual waste diverted to ***recycling*** or reuse expressed in units of weight (e.g., kg or tonnes).

Basic metrics – Social matters

B 8 – Workforce – General characteristics

34. The undertaking shall disclose the total number of ***employees*** in full-time equivalents or provide a headcount of such employees broken down by:

    (a) type of employment contract (temporary or permanent);

    (b) gender; and

    (c) country if applicable.

B 9 – Workforce – Health and safety

35. The undertaking shall disclose the following information regarding its ***employees:***

    (a) the number and rate of ***recordable work-related*** accident; and

    (b) the number of fatalities as a result of work-related injuries and work-related ill health.

B 10 – Workforce – Remuneration, collective bargaining and training

36. The undertaking shall disclose:

    (a) when a significant proportion of ***employees*** are compensated based on ***wages*** subject to minimum wage rules, the relevant ratio of the entry level wage to the minimum wage;

    (b) the percentage gap in ***pay*** between its female and male ***employees***. The undertaking may omit this disclosure when its head count is below 150 employees;

    (c) the percentage of ***employees*** covered by collective bargaining agreements; and

    (d) the average number of annual ***training*** hours per ***employee***, broken down by gender, that are related to the development of skills and competences, whether acquired through formal or informal forms of capacity-building.

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B 11 – Workers in the value chain, affected communities, consumers and end-users

37. The undertaking may disclose whether it has a process in place for identifying if there are ***value chain*** workers, ***affected communities***, or ***consumers*** and end-users who are affected or are likely to be affected by severe negative impacts in relation to the undertaking's operations (i.e., its products, services and activities). In that case, the undertaking may describe this process. If identified, the undertaking may also describe the types of impacts, including where they arise and the groups that are affected by them.

Basic metrics – Business conduct

B 12 – Convictions and fines for corruption and bribery

38. In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.

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Principles for the preparation of the sustainability report (Narrative-PAT, Business Partners)

39. This section includes principles that shall be applied when the undertaking prepares its sustainability report using the Narrative-PAT Module and/or the Business Partners Module.

Time horizons

40. When preparing its sustainability report, the undertaking shall adopt the following time horizons:

(a) for the short-term time horizon, one year;

(b) for the medium-term time horizon, from two to five years; and

(c) for the long-term time horizon, more than five years.

Coherence and linkages with disclosures in financial statements

41. When the undertaking also prepares financial statements and other regulatory reports, the information provided in its sustainability report following this [draft] Standard:

(a) shall be coherent with what is reported in the financial statements for the same period; and

(b) may be presented in a way that facilitates the understanding of the linkages that exist with the information reported in financial statements, for example, by using appropriate cross-references.

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Principles of materiality to be applied in the preparation of Narrative-PAT and Business Partners Modules

42. Issues connected to environmental, social and/or ***business conduct*** aspects identified in this context are referred to as sustainability matters. This section explains how to identify sustainability matters that are 'material', meaning 'relevant', and therefore to be reported.

43. Materiality refers to the significance to the undertaking of both a sustainability matter and information about the sustainability matter. Materiality analysis is the process of identifying sustainability matters that undertakings should report on. The undertaking is encouraged to use the list contained in Appendix B *List of sustainability matters* of this [draft] Standard as guidance for the identification of its material sustainability matters. The materiality analysis does not apply to an undertaking that decides to only apply the Basic Module.

44. As part of its materiality analysis, the undertaking will assess impacts that it has or is likely to have on people and the environment as well as financial risks and opportunities that derive or may derive from sustainability matters. Identifying which sustainability matters are material is a necessary step particularly when minimising or avoiding negative impacts. At the same time, it can help the undertaking to improve its products or services or to develop new ones that address environmental or social challenges. Understanding financial risks allows the undertaking to reduce operational costs and avoid fines, litigations and reputational damages.

45. When assessing whether a sustainability matter is to be reported on because it is material to the undertaking, two dimensions have to be considered, namely impact materiality and financial materiality. This is what is generally referred to as double materiality analysis.

Impact materiality

46. From the impact perspective, a sustainability matter is to be reported on when it gives rise to material impacts. This includes:

    (a) actual or potential impacts on people or on the environment over the short, medium, and long-term time horizons. An impact is actual when it is already happening, whereas an impact is potential when it is likely to happen; and

    (b) impacts connected to the undertaking's own business operations, products and services as well as through its business relationships, such as those that arise from the operations of suppliers.

47. To determine if an actual negative impact is material, the undertaking has to consider the severity of the impact in question on people and the environment severity is based on:

    (a) scale, i.e., how grave the harm caused to people or to the environment is (e.g., a minor injury at work without days lost is placed lower on the scale than a fatality at work; inadequate industrial waste disposal leading to soil pollution within a local facility is placed lower on the scale than a leak of harmful chemicals in a river leading to severe damage of ecosystem and wildlife);

    (b) scope, i.e., how widespread the harm caused to people or to the environment is (e.g., the number of people affected or the size of contaminated land); and

    (c) the irremediable character of the impact, that is, whether and to what extent it is possible to remediate the harm caused to people or to the environment (e.g., cleaning up the contaminated land, issuing compensations and/or indemnities for affected people).

48. The consideration of scale, scope and irremediability is meant to guide undertakings when analysing the severity of its impacts. The undertaking, however, is not expected to report on details related to each of these three aspects.

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49. For potential impacts, the undertaking has to consider both severity and likelihood of occurrence. In the case of a potential negative impact on human rights, the severity of the impact takes precedence over its probability.

50. Quantitative measures of impacts yield the most objective evidence that can be collected to assess their materiality. However, quantitative data is not always available or may be costly to produce. Qualitative analysis can be sufficient for the undertaking to reasonably conclude whether a matter is material or not.

Financial materiality

51. From a financial perspective, a sustainability matter is material if it pertains to financial risks that could be reasonably expected to have material financial effects materially influencing the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital over short-, medium- or long-term time horizons. In addition to the undertaking's business operations, matters related to the undertaking's business relationships with other companies should also be considered.

52. Material impacts generated by the undertaking generally constitute a source of financial risk. However, the undertaking shall also consider risks that are not related to its material impacts.

53. Like risks, financial opportunities related to a sustainability matter may generate financial effects. Reporting on financial opportunities is optional when preparing a sustainability report under this [draft] Standard.

54. Dependencies on natural and social resources may trigger financial risks in two ways:

(a) they may influence the undertaking's ability to continue to use or obtain the resources needed in its business processes as well as the quality and pricing of those resources; and

(b) they may affect the undertaking's ability to rely on business relationships on acceptable terms.

55. To determine whether a financial risk is material, the undertaking shall assess the probability, the nature and the potential magnitude of the financial effects on the undertaking.

Stakeholders and their relevance to the materiality analysis process

56. Stakeholders are those individuals or groups of people who can exercise influence over the undertaking and/or be affected by the activities of the undertaking. There are two main groups of stakeholders:

(a) affected stakeholders, i.e., individuals or groups of people whose interests are or could be – positively or negatively – affected by the undertaking's activities and its business relationships; and

(b) users of the sustainability report, including investors, lenders, business partners, social partners and civil society organisations.

57. Some stakeholders may belong to both groups defined in paragraph 56. An undertaking may engage with stakeholders in its materiality analysis to find out which sustainability matters are the most important to them. In many cases, micro undertakings will only consider the views of their most relevant stakeholders among those mentioned in paragraph 56.

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Narrative – Policies, Actions and Targets (PAT) Module

Disclosure N 1 – Strategy: business model and sustainability – related initiatives

58. The undertaking shall disclose the key elements of its strategy and its business model, including:

(a) a description of significant groups of products and/or services offered;

(b) a description of significant market(s) the undertaking operates in (B2B, wholesale, retail, countries);

(c) a description of main business relationships (such as key suppliers, customers distribution channels and ***consumers***); and

(d) if applicable, a description of the key elements of its strategy that relate to or affect sustainability matters.

Disclosure N 2 – Material sustainability matters

59. The undertaking shall disclose the material sustainability matters resulting from its materiality analysis (see paragraphs 42 through 57), including a brief description of each sustainability matter (listed in accordance with paragraph 43) and of:

(a) how each matter has an impact on people or the environment;

(b) its actual and potential effects on the undertaking's present or future financial position and performance; and

(c) its actual and potential effects on the undertaking's activities and strategy.

Disclosure N 3 – Management of material sustainability matters

60. The undertaking shall disclose how it manages its material sustainability matters, including:

(a) whether it has adopted policies or ***actions*** to *(i)* prevent, *(ii)* mitigate and/or *(iii)* remediate actual or potential negative impacts and/or to *(iv)* address financial risks. If applicable, the undertaking may refer to the [due diligence] or risk management processes implemented;

(b) if it has policies in place, it shall describe:

i. the objective(s) of the ***policy*** and which material sustainability matters it addresses;

ii. the scope of the ***policy*** in terms of activities, ***value chain*** and countries where the undertaking is active;

iii. if applicable, affected stakeholder groups addressed by the ***policy***;

iv. if applicable, a reference to third-party standards or initiatives that the undertaking commits to respect through the implementation of the ***policy***; and

v. the ***targets*** the undertaking uses to monitor the implementation of the ***policy*** and the progress achieved;

(c) if it has put ***actions*** in place, it shall describe:

i. the list of key ***actions*** taken in the reporting year and of the actions planned for the future;

ii. the scope of those ***actions*** (i.e., whether they also address actors in the ***value chain***, whether they are implemented in different location and geographies or which affected stakeholder groups they address);

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iii. the time horizon under which the undertaking intends to complete each key action; and

iv. the ***targets*** the undertaking uses to monitor the ***actions*** implemented and the progress achieved.

61. Where material, the undertaking shall disclose the ***actions*** taken in the reporting period to improve its energy efficiency and to reduce its greenhouse gas emissions as well as the related possible implications in terms of financial risks and, if applicable, opportunities.

62. When the undertaking considers that negative impacts are material in relation to *(i)* workers in the ***value chain***, *(ii)* ***consumers*** and ***end-users*** and/or *(iii)* ***affected communities***, it may disclose:

(a) the policies that it has adopted to manage those material impacts as well as the associated material risks;

(b) the ***actions*** it has taken on material impacts, its approach to managing material risks, and the effectiveness of those actions; and

(c) the ***targets*** related to managing material negative impacts and managing material risks.

63. These disclosures are limited to the description of the policies, ***actions*** and ***targets*** that the undertaking has put in place.

64. Where material, the undertaking shall disclose whether it has the following in place to support the prevention of ***incidents*** of ***corruption*** or bribery:

(a) separation of duties; and/or

(b) ***training*** for its ***employees;*** and

(c) any ***actions*** taken to address breaches in procedures and standards of anti-corruption and anti-bribery.

Disclosure N 4 – Key stakeholders

65. If the undertaking engages with stakeholders, it may disclose:

(a) the categories of key stakeholders being considered (the undertaking can use categories such as investors, lending banks/creditors, business partners, trade unions, NGOs, etc.); and

(b) a brief description of the engagement activities.

Disclosure N 5 – Governance: responsibilities in relation to sustainability matters

66. The undertaking shall describe its ***governance*** and responsibilities in relation to sustainability matters. If applicable, this disclosure shall cover roles and responsibilities of the highest governance body or of the individual(s) in charge of managing sustainability matters within the undertaking.

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Business Partners Module

67. This module provides additional datapoints in relation to the information that is generally needed by the undertaking's business partners, investors and lenders. They are expected to address data requests that the undertaking receives or is likely to receive from lenders, investors and corporate clients, which require sustainability data from their suppliers. In relation to the information needs of financial market participants, these additional datapoints reflect their respective obligations under relevant laws and regulations. They are also relevant for business partners when they assess the sustainability profile of the undertaking as supplier or potential supplier.

List of material matters

68. In this module, the materiality analysis described in paragraphs 42 through 57 is required. The undertaking shall disclose the material sustainability matters resulting from its materiality analysis based on the list provided in Appendix B: *List of sustainability matters*.

Entity-specific consideration when reporting on GHG emissions under B 3 (Basic Module)

69. Depending on the type of activities carried out by the undertaking, a quantification of its Scope 3 GHG emissions can yield relevant information (see paragraph 11 of this [draft] Standard) on the undertaking's ***value chain*** impacts on climate change.

70. Scope 3 emissions are ***indirect GHG emissions*** (other than Scope 2) that derive from an undertaking's ***value chain***. They include the activities that are upstream of the undertaking's operations (e.g., purchased goods and services, purchased capital goods, transportation of purchased goods, etc.) and activities that are downstream of the undertaking's operations (e.g., transport and distribution of the undertaking's products, use of sold products, investments, etc). If the undertaking decides to provide this metric, it should refer to the 15 types of Scope 3 GHG emissions identified by the GHG Protocol Corporate Standard and detailed by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. When it reports on Scope 3 GHG emissions, the undertaking includes significant Scope 3 categories (as per the Corporate Value Chain (Scope 3) Accounting and Reporting Standard) based on its own assessment of relevant Scope 3 categories. Undertakings can find further guidance on specific calculation methods for each category in the GHG Protocol "Technical guidance for Calculating Scope 3 Emissions".

71. When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under "B 3 – Energy and greenhouse gas emissions."

Disclosures in the Business Partners Module

72. The text below provides the list of disclosures from BP1 to BP 11 to be considered and reported upon if they are applicable or if they are considered relevant to the undertaking's business and organisation, following the materiality analysis performed by the undertaking in line with paragraphs from 42 to 57. When not reported upon, a disclosure shall be assumed to be 'not material' for the undertaking.

73. Instructions to support the preparation of disclosures form BP 1- BP 11 are available in the Business Partners Module guidance on pages 35 through 38 of this [draft] Standard.

Disclosure BP 1 – Revenues from certain sectors

74. The undertaking shall include a statement indicating if it is active in one or more of the following sectors while disclosing its related revenues:

(a) controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons; and/or

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(b) the cultivation and production of tobacco; and/or

(c) fossil fuel (coal, oil and gas) sector (i.e., the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, from oil and from gas); and/or

(d) chemicals production, as its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006[2].

Disclosure BP 2 – Gender diversity ratio in governance body

75. If the undertaking has a ***governance*** body in place, the undertaking shall disclose the related gender diversity ratio.

Disclosure BP 3 – GHG emissions reduction target

76. If the undertaking has set GHG emission reduction ***targets***, it shall provide its GHG emission reduction targets for:

(a) scope 1 emissions; and

(b) scope 2 emissions.

77. This disclosure includes Scope 3 emissions, only when they are disclosed under paragraph 71 above and the undertaking has set GHG emission reduction targets for Scope 3 emissions.

Disclosure BP 4 – Transition plan for climate change mitigation

78. The undertaking shall provide information about its transition plan for climate change mitigation with an explanation of how GHG emission reduction ***targets*** are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement. This disclosure is applicable only if the undertaking has adopted such a transition plan.

Disclosure BP 5 – Physical risks from climate change

79. The undertaking shall disclose the anticipated financial effects that physical risks from climate change may have on the company. This disclosure is applicable only if the undertaking is exposed to material physical risks. In particular, it shall disclose:

(a) the monetary amount and the percentage of the undertaking's total assets that can be subjected to material physical risks over the short-, medium- and long-term before considering ***climate change adaptation actions*** disaggregated by acute and chronic physical risk;

(b) the proportion of assets at material physical risk addressed by the ***climate change adaptation actions***;

(c) the location of the significant assets affected by material physical risks;

(d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term; and

(e) the breakdown of the undertaking's carrying value of its real estate assets by energy efficiency classes.

[2] "Manufacture of pesticides and other agrochemical products" listed in Division 20.2 of Annex I Regulation EC 1893/2006.

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Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio

80. If the undertaking generates hazardous and/or radioactive waste, the undertaking shall disclose the total amount of ***hazardous waste*** and/or radioactive waste generated (radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom).

Disclosure BP 7 – Alignment with internationally recognised instruments

81. The undertaking shall disclose whether its policies pertaining to its ***own workforce*** are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.

Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations

82. The undertaking shall disclose whether it has processes in place to monitor compliance with the OECD Guidelines for Multinational Enterprises and with the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the International Bill of Human Rights and the eight fundamental conventions identified in the ILO Declaration or grievance/complaints handling mechanisms, to address violations of the above standards with regard to its ***own workforce***.

Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the eight fundamental conventions of the ILO Declaration and the International Bill of Human Rights)

83. The undertaking shall disclose whether there have been any violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises with regard to its ***own workforce*** during the reporting year.

Disclosure BP 10 – Work-life balance

84. The undertaking shall disclose the percentage of its ***employees:***

(a) who are entitled to take family-related leave with a breakdown by gender; and

(b) who took family-related leave with a breakdown by gender.

Family-related leave includes maternity, paternity, parental and carers' leave.

Disclosure BP 11 – Number of apprentices

85. If applicable, the undertaking shall disclose the number of apprentices in the reporting period.

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Basic Module: Guidance

86. This guidance is intended to support the preparation of the Metrics in the Basic Module.

Environmental Metrics

Metric B 3 – Energy and greenhouse gas emissions

Impacts on climate: energy usage and greenhouse gas emissions

87. Under paragraphs 24 and 25, the undertaking reports on its climate impacts, providing information about its energy use and greenhouse gas emissions. This guidance for disclosure B 3 does not constitute an additional datapoint to the disclosures described in paragraphs 24 (on energy consumption) and 25 (on GHG emissions) but rather an overarching objective of the Basic disclosure B 3.

88. Climate impacts are significantly driven by energy consumption. Therefore, it is relevant to disclose both the quantity as well as the type – e.g., fossil fuels such as coal, oil, and gas versus ***renewable energy*** – and mix of energy consumed. Examples of energy disclosures are total energy consumption broken down by fossil fuels and electricity. Other breakdowns may be reported such as consumption of purchased or self-generated electricity from renewable sources. This information may be provided in the following format:

	202(x) Energy consumption (MWh)
Fossil fuels	486
Electricity	10

89. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt-Hours (MWh) of electricity purchased from a utility, steam received from a nearby industrial plant or diesel purchased at petrol stations.

90. In case the undertaking purchases fossil or renewable fuels such as natural gas, oil or biomass to generate electricity, heat or cooling for its own consumption, it has to avoid double counting. Therefore, the undertaking accounts for the energy content of the purchased fuel only as fuel consumption, but it does not account for or report on its electricity and heat consumption yet again. In case of electricity generation from renewable energies such as solar or wind – and where no fuel use in necessary – the undertaking accounts for the amount of electricity generated and consumed as electricity consumption.

91. As for greenhouse gas emissions arising from the undertaking's activities, this requirement builds on the definitions and rules of the GHG Protocol, the leading accounting standard for GHG emissions. Under paragraph 25, undertakings are to report on their Scope 1 and Scope 2 emissions. Scope 1 GHG emissions cover direct emissions from owned or controlled sources. Scope 2 emissions are ***indirect GHG emissions*** resulting from the activities of the reporting company (as they derive from the undertaking's consumed energy) which, however, occur at sources owned or controlled by another company. Further guidance is provided in the sections below on how to calculate Scope 1 and 2 emissions.

92. Scope 1 and 2 emissions may be reported in the following format.

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	202(x) GHG emissions (tCO_2e)
Scope 1	45
Scope 2	6
Total	51

Scope 1 emissions calculation guidance

93. Typical Scope 1 emissions include CO2 (as well as CH4 and N2O) emissions associated with fuel combustion (for example, in boilers, furnaces, vehicles, etc.) and fugitive emissions from air conditioning and industrial processes.

94. Emissions associated with combustion can be calculated by the expression

$$Emissions_{GHG,Fuel} = Activity\ Data_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

where the value assigned to '$Emissions_{GHG}$' corresponds to the emissions of CO2, CH4 or N2O resulting from the combustion of the Fuel in tCO2e.

'$Activity\ Data_{Fuel}$' corresponds to the quantity of fuel consumed. Though typically expressed in energy units, it can also be expressed in volume (m³ or l) or mass (tonnes or kg.).

'$EF_{GHG,Fuel}$' corresponds to the specific combustion Emission Factor (EF) used for the fuel. The units of the EF need to be consistent with the units of the activity data.

'GWP_{GHG}' corresponds to the Global Warming Potential of the GHG (CO2, CH4 or N2O). The activity data can be determined using fuel purchase receipts and purchase records or through direct measurement at the combustion device. The fuel quantities can be measured in different forms (typically mass or volume), and care needs to be taken to make sure that the activity data and the EF are expressed using the same units. It is not uncommon for emission factors of fuels to be expressed in terms of energy (Lower Calorific Value), in which case the further step of converting the volume or mass of the fuel to its energy content is needed (see the example below). This way, the expression above can take different forms, namely

$$Emissions_{GHG,Fuel} = Activity\ Data_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

$$Emissions_{GHG,Fuel} = [Volume * CalorificValue]_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

95. CO2 emission factors are either derived through analysis of the carbon and heat content of the fuel (not likely to be needed for SME undertakings) or through the use of published emission factors for the most common fuels. EFs for CH4 and N2O will depend on the type of combustion technology and will vary with it. In most cases, CH4 and N2O emissions are within the measurement error of CO2 and can be neglected. Sometimes the emission factor can already take into account the GWP of the GHG. In that case the parameter GWP_{GHG} does not need to be considered.

96. For the GWP, use the most recent values published by the Intergovernmental Panel on Climate Change (IPCC) based on a 100-year time horizon to calculate tCO2eq emissions of non-CO2 gases. The current list features the IPCC's 6th Assessment Report, Chapter 7SM[3].

[3] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, and M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the

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97. The following table provides a list of non-exhaustive sources of emission factors for fuels. Undertakings may also refer to authoritative national sources that may be more relevant to the particulars of their situation.

Documentation Sources:

Data	*Documentation Source*
Activity data	fuel purchase receipts, purchase records, or through direct measurement at the combustion device.
Emissions Factors (EF):	
Fuel	ADEME – Bilan Carbonne *https://base-empreinte.ademe.fr/* IPCC – Emissions Factor Database *https://www.ipcc-nggip.iges.or.jp/EFDB/find_ef.php?reset=* IPCC – Guidelines for National Greenhouse Gas Inventories *Microsoft Word - V2_Ch2_Stationary_Combustion_Final.doc (iges.or.jp)*
Global Warming Potential (GWP)	IPCC – Global Warming Potential p. 16 *https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07_SM.pdf*

You can find more guidance and tools on how to act and report on climate by visiting https://smeclimatehub.org/.

Example

98. Company A burns Nr. 4 fuel oil in an industrial boiler. For its financial accounting, it keeps track of its costs, and for GHG accounting purposes, it keeps track of volumes (m^3) as reflected in their fuel receipts. From the receipts, it determines the annual volumes of fuel oil bought, and it keeps track as well of the fuel oil inventory on the first calendar day of the year. In 2023 it purchased 100 m^3 of fuel oil. Based on its records, on 1 January 2023 it had 2.5 m^3 in its reservoirs, and on 1 January 2024 it had 1 m^3. Thus, it determines (through purchase and measurement of inventory) that during 2023 it consumed 101.5 m^3 of fuel oil.

Using the IPCC list of emissions factors (Table 2.3, page 2.18), it estimates its emission factor to be a fifty-fifty blend of diesel oil and residual oil as 75.75 t CO2/TJ and by using published statistics on energy determined that its net calorific value of the fuel is 0.03921 TJ/m^3. Given that the CO_2 GWP equal one, its CO_2 emission for this specific Scope 1 source is:

$$101.5\ m^3 * 0.03921\ TJ/m^3 * 75.75\ t\ CO_2/TJ * 1 = 301.5\ t\ CO_2$$

For completeness of this example, the CH_4 and N_2O emissions are also calculated. Checking the IPCC list of emission factors, these are respectively 3 kg of CH_4/TJ and 0.6 kg of N_2O/TJ, thus the emissions will be:

Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Available on https://www.ipcc.ch/.

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CH_4 emissions = 101.5 m^3 * 0.03921 TJ/m^3 * 3 kg CO_2/TJ * 29.8 = 0.36 tCO_2e

N_2O emissions = 101.5 m^3 * 0.03921 TJ/m^3 * 0.6 kg CO_2/TJ * 273 = 0.65 tCO_2e

As mentioned, CH4 and N2O emissions add around 1 tCO2e to the CO2 value of 301.5 tCO2, which amounts to about 0.3% of the total. This could be considered well within an acceptable reporting error and so could not have been calculated and reported.

Global Warming Potentials for CH_4 and N_2O are derived from IPCC's 6th Assessment Report, Chapter 7SM[4].

Guidance for location-based Scope 2 emissions calculation

99. Location-based Scope 2 includes emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company. It reflects the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data.

100. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).

101. Emissions associated with the purchase and consumption of electricity, heat, steam and cooling can be calculated by the expression

$$Emissions_{GHG} = Activity\ Data * EF$$

where '$Emissions_{GHG}$' corresponds to the emissions of GHG resulting from the production of electricity, heat, steam or cooling (in the case of combustion of fuels, typically CO_2, CH_4 and N_2O). '$Activity\ Data$' corresponds to the quantity of fuel consumed, typically expressed in energy units (e.g., MWh). And '$EF_{GHG,Energy}$' corresponds to the EF used for the production of energy (electricity, heat, steam or cooling). The emission factors can be grid average factors. The units of the EF need to be consistent with the units of the activity data.

102. A grid average emission factor is an emission factor that characterises all the GHG emissions associated with the quantity of electricity generation produced by facilities located within a specified geographic boundary. These emission factors are usually produced for periods of one year – by averaging emissions and electricity production over a calendar year – and are often produced by the Electricity System Operator (ESO), Transmission System Operators (TSO), the electricity system supervisory body or other competent authorities. There are also grid average emission factors calculated for much shorter periods, e.g., for seconds or minutes.

103. Undertakings may also want to provide their market-based Scope 2 figure. Emission factors for market-based Scope 2 emissions reflect the contractual arrangements of the undertaking with its energy suppliers. Market-based emission factors can be provided by their electricity or heat suppliers as well as supported by their own purchase of Energy Attribute Certificates or Power Purchase Agreements (PPAs) or the use of residual-mix emission factors.

104. Scope 2 accounting methods are explained in more detail in the GHG Protocol Scope 2 Guidance.

[4] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, and M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Available from https://www.ipcc.ch/.

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Example

105. Company A occupies an office building of 2000 m^2 in Paris, where it pays the electricity consumed for the central heating and cooling, lighting, computers and other electric equipment such as appliances. With its utility bills, it has estimated that the building consumed 282 MWh of electricity in 2022. By using the emission factor provided by nowtricity.com for France in 2022, it has estimated its Scope 2 emissions for its building electricity consumption to be

$$Emissions_{GHG} = 282\,000\ [kWh] * 73 \left[\frac{g\ CO_2eq}{kWh}\right] = 20.6\ \text{t}\ CO2_2eq$$

106. The following table provides a list of non-exhaustive sources of electricity emission factors. Undertakings may also refer to authoritative national or grid sources that may be more relevant to the particulars of their situation.

Documentation Sources:

Data	*Documentation Source*
Activity data	Purchase receipts or utility bills, contract purchase or firm purchase records
Emissions Factors (EF):	
Europe Grid electricity	Association of Issuing Bodies (AIB) – Residual Mix Grid Emission Factors https://www.aib-net.org/facts/european-residual-mix ADEME – Bilant Carbonne https://base-empreinte.ademe.fr/ JRC – Historical GHG emissions factor for electricity consumption https://data.jrc.ec.europa.eu/dataset/919df040-0252-4e4e-ad82-c054896e1641#dataaccess *Life-cycle electricity production emission factors* https://www.nowtricity.com/
North America Grid electricity	USEPA GHG emission factors Hub https://www.epa.gov/climateleadership/ghg-emission-factors-hub Government of Canada https://publications.qc.ca/collections/collection_2023/eccc/En84-294-2023-eng.pdf
Other regions/Global	IEA's Annual GHG emission factors for World countries from electricity and heat generation (2022 data set, paid data set) https://www.iea.org/data-and-statistics/data-product/emissions-factors-2022#emissions-factors
Global Warming Potential (GWP)	IPCC – Global Warming Potential (GWP-100) p. 16 https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07_SM.pdf

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107. More guidance and tools on how to act and report on climate can be found at https://smeclimatehub.org/.

Conversion between different energy units

108. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt-Hours (MWh) of electricity purchased from the utility steam received from a nearby industrial plant or diesel purchased at petrol stations.

109. Paragraph 24 indicates MWh as the unit of choice for measuring energy consumption. In case of fuel or biomass, a conversion to MWh is necessary for data expressed in other units such as energy content (e.g., kJ, Btu), volume (e.g., litres, m^3) or mass (e.g., metric tonnes, short tonnes).

110. For fuel consumption measured by mass (e.g., wood, coal), the undertaking should

(a) obtain the Net Calorific Value (e.g., kJ/metric ton, TJ/Gg) of the fuel (it can be a typical value published by reliable sources, e.g., IPCC, or may be provided by the supplier or attained internally);

(b) convert the Net Calorific Value to MWh/ton, for example,

1 TJ = 1,012 J = 277.78 MWh ; 1 Gg = 10^9 g = 1,000 t

11.9 TJ/Gg = 11.9 * 277.78/1000 t = 3.31 MWh/ton; and

(c) calculate the energy content of the mass, for example,

1,245,345 t * 3.31 MWh/ton = 4,117,111 MWh.

111. For liquid fuel, the undertakings should:

(a) convert volume information to mass, multiplying volume by fuel density, for example,

Diesel = 4,456,000 l; Diesel density = 0.84 kg/l

4,456,000 (l) * 0.84 (kg/l) = 3,743,040 kg = 3,743 t;

(b) calculate the energy content, multiplying mass by Net Calorific Value, for example,

3,743 [t] * 43 [TJ/Gg] = 3,743 t * 43 TJ/(1,000 [t]) = 160.95 [TJ] ; and

c) convert TJ to MWh, for example,

1 TJ = 1,012 J = 277.778 MWh

160.95 [TJ] = 277.78 [MWh/TJ] * 160.95 [TJ] = 44,708 MWh.

Documentation Source:

Data	*Documentation Source*
CDP	CDP Technical Note: Conversion of fuel data to MWh https://cdn.cdp.net/cdp-production/cms/guidance_docs/pdfs/000/000/477/original/CDP-Conversion-of-fuel-data-to-MWh.pdf?1479755175

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Metric B 4 – Pollution of air, water and soil

Guidance on which undertakings need to report on pollution and what pollutants do undertakings need to report on

112. Paragraph 26 establishes that, if applicable, the undertaking shall disclose the pollutants it emits to air, water and soil in its own operations if such information is already required to be reported by law to competent authorities or under an Environmental Management System such as EMAS.

113. The metrics to be disclosed under this paragraph refer to information that the undertaking is already mandated to provide by law. This requirement was conceived to avoid any additional reporting burden on undertakings. In general, this requirement is expected to apply to undertakings that are operators of an industrial installation covered by the Industrial Emissions Directive (IED). The IED applies to some 52,000 installations in Europe, covering activities such as burning fuel in boilers with rated power of more than 50 MW, founding in metal foundries, processing of non-ferrous metals, production of lime, manufacturing of ceramic products by firing, production of plant protection products or biocides, tanning of hides, slaughterhouses, etc. In these cases, the installation already has to report to the competent authority the pollutants released to air, water and soil, and the data is publicly available at the European Pollutant Release and Transfer Register (E-PRTR). Companies that operate in more than one facility do not have to report on their consolidated company-wide emissions under the EPRTR, as they report only at facility level. This [draft] Standard requires the reporting of the total amount of pollutants of all the facilities. Similarly, companies owning but not operating in a facility do not have to report to the E-PRTR but are expected to reflect their facility-owned emissions in their sustainability report.

114. Likewise, if under an EMAS certification an undertaking has been identified as having to monitor and report on the pollutants listed in the E-PRTR, these are in principle relevant aspects for the undertaking to include in its sustainability report.

115. If an undertaking has only one facility or operates in only one facility, and if its pollution data is already publicly available, the undertaking may refer to the document where such information is provided instead of reporting it once again. Likewise, if the undertaking publishes an organisation-wide EMAS report that incorporates pollution data, it can include it in the sustainability report by reference.

116. To report information on pollutants in the sustainability report, the undertaking should indicate the type of pollutant material being reported alongside the amount emitted to air, water and soil in a suitable mass unit (e.g., t or kg).

117. Below can be found an example of how undertakings may present information on their emissions to air, water and soil divided by pollutant type.

Pollutant	Emissions (kg)	Medium of release (air, water, soil)
e.g., Cadmium and compounds	10	Water
Type of pollutant 2		
Type of pollutant 3		

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Metric B 5 – Biodiversity

Guidance on how to identify sites in or near biodiversity sensitive areas

118. Paragraph 28 stipulates that the undertaking shall disclose the sites it operates in that are located in or near ***biodiversity sensitive areas***. Biodiversity sensitive areas are defined as such by special nature protection regulation at European or international level. These comprise areas belonging to the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs') as well as other protected areas as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/21398.

119. The following table shows how information on sites in or near ***biodiversity sensitive areas*** can be presented. The undertaking may provide information about the location of the plant (e.g., country and site name) without specifying its exact address.

Location	**Area** (hectares)	**Biodiversity sensitive Area**	**Specification** (located in/near biodiversity sensitive areas)
Country – Site 1			
Country – Site 2			
Country – Site 3			
...			

120. For the purposes of this [draft] Standard, the term 'near' should be interpreted as meaning an area that is (partially) overlapping or adjacent to a ***biodiversity sensitive area***.

Documentation Sources:

Data	*Documentation Source*
Natura 2000 Network of protected areas	https://natura2000.eea.europa.eu/
Key Biodiversity Areas – IUCN	https://www.keybiodiversityareas.org/sites/search
UNESCO – World Heritage Centre	https://whc.unesco.org/en/list/

Guidance on how to calculate and report land-use

121. The undertaking may disclose in units of area (e.g., m^2 or ha) on land-use using guidance provided by the EMAS:

(a) its total use of land,

(b) its total ***sealed area***,

(c) its total ***nature-oriented area*** on-site, and

(d) its total ***nature-oriented area*** off-site.

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122. The following table shows how information on ***land-use*** may be presented.

Land-use type	**Area** (hectares or m²)		
	Previous year	**Reporting year**	**% change**
Total sealed area			
Total nature-oriented area on-site			
Total nature-oriented area off-site			
Total use of land			

Documentation Sources:

Data	*Documentation Source*
EMAS Guidance	EU Commission Regulation 2018/2026 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2026&rid=2

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Metric B 6 – Water

Guidance on how to calculate and report on water withdrawals and water consumption

123. ***Water withdrawal*** relates to the amount of water an undertaking draws into its organisational boundaries from any source during the reporting period. In practice, for most undertakings this relates to the amount of water taken from the public water supply network as indicated in the utility bills. However, where applicable, water withdrawal also includes amounts of water taken from other sources such as groundwater from own wells, water taken from rivers or lakes, or water received by other undertakings. Rainwater collected by the undertaking is not considered as water withdrawal.

124. ***Water consumption*** is the amount of water drawn into the boundaries of the undertaking that is not discharged or planned to be discharged back into the water environment or to a third party. This typically relates to water evaporated – e.g., in thermal energy processes like drying or power production – water embedded in products – e.g., in food production – or water for irrigation purposes – e.g., used in agriculture or for watering company premises. Collected rainwater can be considered in the calculation of water consumption, as a separate input from water withdrawal.

125. **Water discharge** means, for example, the amount of water transferred directly to receiving water bodies such as lakes or rivers, the public sewer or to other companies for cascading water use.

126. ***Water consumption*** can therefore be calculated as:

Water consumption = Water [withdrawal + rainwater harvest – discharges]

For undertakings that solely withdraw water from the public water network and discharge it into the sewer, water consumption will be close to zero and can therefore be omitted from the report.

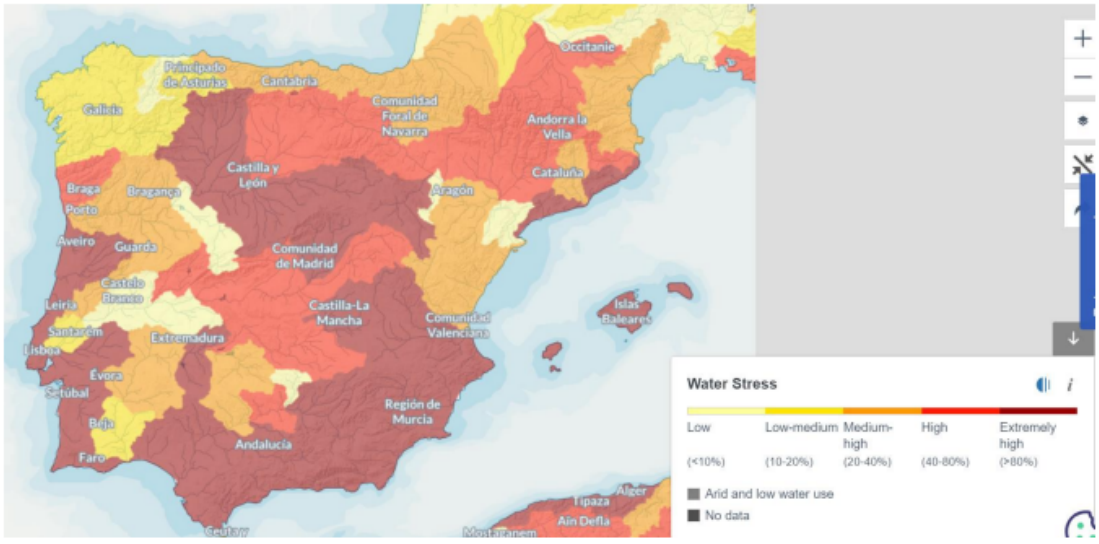
127. The undertaking may provide additional explanatory information to contextualise its water withdrawals or consumption. For example, the undertaking may highlight if rainwater is collected and used as a replacement of tap water or if water is discharged into other parties for cascading use.

128. Below can be found an example of how undertakings may present quantitative information on their withdrawals, discharges and consumption of water divided by site location.

	Water withdrawal E.g., m³	**Water consumption** E.g., m³ (if applicable)
All sites		
Sites in areas with water stress		

Guidance for determining if the undertaking operates in an area of high-water stress

129. To determine if the undertaking operates in an area of high-water stress, you can consult the regional water authorities of the places you operate in to understand their assessment of the water resources for that specific location. Alternatively, you can also consult publicly available and free tools that map out water scarcity globally. One such tool is the WRI's Aqueduct Water Risk Atlas. With the help of this tool, undertakings can consult the water stress baseline set for different river basins globally. By way of illustration, the map below shows the main Iberian river basins and their water stress classification according to the WRI Aqueduct.



130. In this image several water basins in the Iberian Peninsula, along with their water stress classification, can be observed. Most of the southern part of the peninsula sits in an area of significant high-water stress – with the exception of the Guadiana basin (in yellow). Thus, if the undertaking has operations within the Guadalquivir basin (e.g., the Andalucia region, which has a significant high-water stress level), the undertaking would have to disaggregate its ***water consumption*** for that region/water basin. But if its operations take place within the southern

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part of the Guadiana river basin (where there is low water stress), then it would not be necessary to disaggregate its water consumption for that region/water basin.

Metric B 7 – Resource use, circular economy and waste management

Guidance on circular economy principles

131. When disclosing information on its products, material use and waste management, the undertaking may provide information in relation to ***circular economy*** principles. Circular economy principles are articulated in the paragraphs below. The key principles outlined by the Ellen Macarthur Foundation are underlined below while the key principles considered by the European Commission are *italicised*.

Eliminate waste and pollution – this can be done through process improvements and also through design considerations at the level of *usability, reusability, repairability, disassembly* and *remanufacturing*.

Circulate products and materials (at their highest value) – *reusability* and ***recycling*** are key for product circulation, but this is enhanced if special consideration is given to circularity at the design phase for issues such as usability, reusability, repairability, remanufacturing and disassembly. Factors such as the incorporation of biomaterials and their *recirculation via the biological cycle* can also be considered, for example, using biodegradable crop covers instead of plastics in agriculture.

Regenerate nature – whenever possible, human activities should seek to regenerate nature and improve or restore key ecological functions (i.e., drainage, habitat provision, thermal regulation, etc.) that may have been lost due to previous human activities.

Guidance on the rate of recycled content in products and packaging

132. When compiling the rate of its recycled content – that is, by adding inputs into the process that have originated from recycled materials – in its products (i.e., its produced goods or materials) and packaging, the undertaking may use as denominator the total weight of recycled materials used in products and packaging (during the reporting period) divided by the total weight of materials in products and packaging (during the reporting period).

Guidance on the rate of recyclable content in products and packaging

133. When compiling the rate of its recyclable content – that is, materials that can be technically recycled – the undertaking may use as denominator the total weight of materials that are recyclable in products and packaging (during the reporting period) divided by the total weight of materials in products and packaging (during the reporting period).

Guidance on how to identify manufacturing and/or packaging processes

134. To identify manufacturing and/or packaging processes, the undertaking may refer to those activities that fall under "Section C – Manufacturing" and Section F "Construction" of Annex I to Regulation (EC) No 1893/2006[5].

Guidance on total waste generation and waste diverted to recycling or reuse

135. When disclosing information on waste, the undertaking may adopt the following tables.

[5] L_2006393EN.01000101.xml (europa.eu).

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	Waste generated (e.g., tonnes)		
	Total waste generated, of which:		
		Waste diverted to recycle or reuse	*Waste directed to disposal*
Non-hazardous waste			
Type of waste1			
Type of waste2			
...			
Hazardous waste			
Type of waste1			
...			

136. Examples of ***hazardous wastes*** that small businesses may generate include batteries, used oils, pesticides, mercury-containing equipment and fluorescent lamps.

137. The undertaking may provide further breakdowns specifying further types of non-hazardous and ***hazardous wastes***. In doing so it may consider the list of waste descriptions found in the European Waste Catalogue's social metrics.

Metric B 8 – Workforce – General characteristics

138. Full-time equivalent (FTE) is the number of full-time positions in an undertaking. It can be calculated by dividing an employee's scheduled hours (total effective hours worked in a week) by the employer's hours for a full-time workweek (total hours performed by full-time employees). For example, an employee who works 25 hours every week for a company where the full-time week is 40 hours represents a 0,625 FTE (i.e. 25/ 40 hours).

139. Head count is the total number of people employed by the undertaking at a given time.

Guidance on how to present information about employees' contract types

140. The following table shows how information on ***employees*** may be presented by type of employment contract.

Type of contract	**Number of employees (full-time equivalents or head count)**
Temporary contract	
Permanent contract	
Total employees	

The following table shows how information on ***employees*** may be presented by gender.

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Gender	Number of employees (full-time equivalents or head count)
Male	
Female	
Other	
Not reported	
Total employees	

141. In some European Union Member States, it is possible for people to legally register themselves as having a third gender, often neutral, which is to be categorised as "other" in the table above. If the undertaking is disclosing data about ***employees*** where this is not possible, it may explain this and indicate that the "other" category is not applicable. The "not reported" category applies to employees who do not disclose their gender identity.

142. The following table shows how information on employees may be presented by countries.

Country	Number of employees (full-time equivalents or head count)
Country A	
Country B	
Country C	
Country D	
Total employees	

143. Definitions and types of employment contracts may vary depending on the country. If the undertaking has ***employees*** working in more than one country, it shall use the legal definitions stipulated in the national laws of the countries where the employees are based in to calculate country-level data. Such country-level data shall then be added up to calculate total numbers, disregarding differences in national legal definitions.

Metric B 9 – Workforce – Health and safety

Guidance on the rate of recordable work-related accidents

144. In order to calculate the rate of ***recordable work-related*** accidents, the formula below should be used:

$$\frac{Number\ of\ work\ related\ accidents\ in\ the\ reporting\ year}{Total\ number\ of\ hours\ worked\ in\ a\ year\ by\ all\ employees}\ x\ 200{,}000$$

145. Based on the assumption that one full-time worker works 2,000 hours per year, the rate indicates the number of work-related accidents per 100 full-time workers over a yearly timeframe. If the undertaking cannot directly calculate the number of hours worked, it may estimate this on the basis of normal or standard hours of work.

Example

146. Company A reported three work-related accidents in the reporting year. Company A has 40 employees and a total number of 80,000 hours (40 x 2,000) worked in a year.

The rate of ***recordable work-related*** accidents is 3/80,000 x 200,000 = 7.5.

Guidance on number of fatalities resulting from work-related injuries and work-related ill health

147. Work-related injuries and work-related ill health arise from exposure to dangers at work.

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148. In case of teleworking, injuries and ill health are work-related if the injury or ill health is directly related to the performance of work rather than the general home environment.

149. In case of injuries and ill health that occur while a person is travelling for work, these are considered work-related if the ***employee*** was performing work activities in the interest of the employer at the time of the injury or ill health. Accidents taking place when travelling, outside of the undertaking's responsibility (i.e., regular commuting to and from work), are subject to the applicable national legislation, which regulates their categorisation as to whether they are considered work-related or not.

150. Mental illness is considered work-related if it has been notified voluntarily by the relevant worker and if an evaluation from a licensed healthcare professional stating that the illness in question is indeed work-related. Health problems resulting from smoking, drug and alcohol abuse, physical inactivity, unhealthy diets, and psychosocial factors not connected to work are not considered work-related.

151. The undertaking may present separately the fatalities resulting from work-related injuries and those resulting from work-related ill health.

Metric B 10 – Workforce – Remuneration, collective bargaining and training

Guidance on remuneration: ratio of entry level to minimum wage

152. 'Significant proportion of employees' refers to the majority of employees in the undertaking without considering interns and apprentices.

153. 'Entry level wage' refers to full-time wage in the lowest employment category. The wages of interns and apprentices shall not be considered when identifying the entry level wage of the undertaking.

154. 'Minimum wages' refer to the minimum compensation of employment per hour, or other unit of time, allowed by law. Depending on the country, the minimum wage might be set directly by law or through collective bargaining agreements. The undertaking shall refer to the applicable minimum wage for the country it reports on (whether set directly by law or through a collective bargaining agreement).

In order to calculate the ratio of entry level wage to minimum wage, the formula below shall be used:

$$Ratio = \frac{\text{Entry level wage}}{\text{Minimum wage}}$$

Guidance on remuneration: percentage gap between female and male employees

155. The metric for the percentage gap between female and male ***employees*** addresses the principle of gender equality, which stipulates equal ***pay*** for equal work. The pay gap is defined as the difference of average pay levels between female and male employees expressed as the percentage of the average pay level of male employees.

156. In order to estimate this metric, all ***employees*** shall be included in the calculation. In addition, there should be two separate average ***pay*** calculations for female and male employees. See the formula below:

$$\frac{(Average\ gross\ hourly\ pay\ level\ of\ male\ employees - average\ gross\ hourly\ pay\ level\ of\ female\ employees)}{Average\ gross\ hourly\ pay\ level\ of\ male\ employees}\ x\ 100$$

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157. Depending on the undertaking's remuneration policies, the gross ***pay*** refers to all of the following elements:

(a) base salary, which is the sum of guaranteed, short-term, and non-variable cash compensation;

(b) benefits in cash, which constitute the sum of the base salary and cash allowances, bonuses, commissions, cash profit-sharing, and other forms of variable cash payments;

(c) benefits in kind such as cars, private health insurance, life insurance, and wellness programs; and

(d) direct remuneration, which is the sum of benefits in cash, benefits in kind and the total fair value of all annual long-term incentives.

158. The gross pay is the sum of all the applicable elements listed above.

159. The average gross hourly pay is the weekly/annual gross pay divided by the average hours worked per week/year.

Example

Company A has *X* male ***employees*** and *Y* female employees in total. Male employees' gross hourly pay is €15 and female employees' gross hourly pay is €13.

The average gross hourly pay level of male employees is the sum of all their gross hourly payments divided by the total number of male employees. The average gross hourly pay level of female employees is the sum of all their gross hourly payments divided by the total number of female employees.

The formula used to calculate the percentage pay gap between male and female employees is

$$\frac{15-13}{15} x\ 100 = 13.3\%$$

Guidance on collective bargaining coverage

160. The ***employees*** covered by ***collective bargaining*** agreements are those individuals to whom the undertaking is obliged to apply the agreement. If an employee is covered by more than one collective bargaining agreement, it only needs to be counted once. If none of the employees are covered by a collective bargaining agreement, the percentage is zero.

161. The percentage of ***employees*** covered by ***collective bargaining*** agreements is calculated by using the following formula:

$$\frac{Number\ of\ employees\ covered\ by\ collective\ bargaining\ agreements}{Number\ of\ employees} x\ 100$$

162. The information required by this disclosure requirement may be reported as coverage rates if the ***collective bargaining*** coverage is between 0–19%, 20–39%, 40–59%, 60–79% or 80–100%.

163. This requirement is not aimed at obtaining the percentage of ***employees*** represented by a works council or belonging to trade unions, which can be different. The percentage of employees covered by ***collective bargaining*** agreements can be higher than the percentage of unionised employees when the collective bargaining agreements apply to both union and non-union members.

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Business Conduct Metrics

Metric B 12 – Convictions and fines for corruption and bribery

164. ***Corruption*** and bribery fall under the ***business conduct*** sustainability matter.

165. Under paragraph 38, the undertaking shall report on the total number of convictions and the total amount of fines incurred for violating anti-corruption and anti-bribery laws.

Guidance on convictions

166. Convictions for the violation of anti-corruption and anti-bribery laws refer to any verdict of a criminal court against an individual or undertaking in respect of a criminal offence related to ***corruption*** and bribery. For example, where these court decisions are entered in the criminal record of the convicting European Union Member State.

Guidance on fines

167. Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-corruption and anti-bribery laws imposed by a court, commission or other government authority, which are paid to a public treasury.

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Business Partners Module: Guidance

168. This guidance is intended to support the preparation of the metrics in the Business Partner Module.

Governance – Business Model Metrics

Disclosure BP 1 – Revenues from certain sectors

169. In accordance with paragraph 74, the undertaking shall declare if it is active in the following sectors, specifying the corresponding revenues:

(a) the manufacturing of controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons (controversial weapons are prohibited by international law because of the indiscriminate harm they can cause to people, including serious bodily harm and death during or past the ending of military conflicts);

(b) the cultivation and production of tobacco;

(c) the fossil fuels (coal, oil and gas) sector (i.e., revenues arising from the exploration, mining, extraction, production, processing, storage, refining or distribution of fossil fuels, including their transportation, storage and trade); and

(d) the production of chemicals, i.e., the activities listed under the Division 20.2 of Annex I to Regulation (EC) No 1893/2006, which involve the manufacturing ". . . of pesticides and other agrochemical products").

170. Criteria regarding those sectors have been stipulated in certain legislation applicable to the financial sector; hence, those sectors have been identified by lenders and investors as carrying sustainability risks.

Disclosure BP 2 – Responsibilities in relation to sustainability matters

171. The ***governance*** body refers to the highest decision-making authority in a company. Depending on the jurisdiction the company is in and its legal entity classification, the governance body can vary in format.

172. The gender diversity ratio of the ***governance*** body is calculated as an average ratio of female to male board members.

$$Gender\ diversity\ ratio = \frac{the\ number\ of\ female\ members}{the\ number\ of\ male\ members}$$

Example

173. A certain ***governance*** body is composed of six members, including three women. The gender diversity ratio is one – for every female member there is one male member.

Environmental Metrics

Disclosure BP 3 – GHG emissions reduction target

174. A GHG emission reduction target constitutes a commitment to reduce the undertaking's GHG emissions in a future year as compared to the GHG emissions measured during a base year. Emission reductions may be achieved, for instance, through electrification, renewable electricity, sustainable products development, etc. Removals and avoided emissions do not count as emission reductions. Disclosure BP 3 requires the undertaking to disclose GHG emission reduction ***targets*** for its Scope 1 and Scope 2 emissions.

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175. A base year is a preceding year against which the undertaking's current GHG emissions can be measured. In general, the base year should be a recent and representative year of the undertaking's GHG emissions in which there are verifiable data.

176. The target year is the year in the future the undertaking aims to achieve a certain absolute or percentage amount of GHG emission reductions. It should range over a period from one to three years from the base year to a short-term target. Longer term ***targets*** may also be included, for instance, for periods of twenty or thirty years (e.g., 2040 or 2050). Undertakings are encouraged to include target values for the short-term target year of 2030 at the least and, if feasible, for the long-term year of 2050. From 2030 onwards, it is recommended to update the base year and target year for GHG emission reduction targets after every five-year period.

177. To set a target, undertakings should consider the existing scientific evidence on GHG mitigation. The SBTi recommends a cross-sector target in GHG emissions reduction of -42% by the year 2030 and -90% by the year 2050 (base year 2020). Specific pathways also exist by sector and may be considered by undertakings when setting their GHG emission reduction ***targets***.

Disclosure BP 4 – Transition plan for climate change mitigation

178. A climate transition plan is a set of present and future ***actions*** meant to align the undertaking's business model, strategy and operations with the key overarching global goal of limiting global warming to 1.5°C. Underpinned by a GHG reduction target compatible with that goal, the importance of having a transition plan in place lies in the ability of understanding the means by which the undertaking will move towards a low-carbon economy while keeping track of the progress made. A transition plan serves as a mechanism for accountability and transparency prompting undertakings to develop credible pathways for mitigating climate change through their ***actions***.

179. A credible transition plan should *(a)* identify clear responsibilities and roles; *(b)* be integrated in the undertaking's business strategy and financial planning; *(c)* include information on decarbonisation levers and pathways as well as quantifiable indicators that can be monitored throughout predefined timeframes; *(d)* allow for regular reviewing and updating after stakeholder consultations when appropriate; and *(e)* cover the entirety of its own operations and, to the largest possible extent, the ***value chain*** or else provide an explanation as to any limitation.

Disclosure BP 5 – Physical Risks from climate change

180. ***Climate-related physical risks*** arise from the effects that climate change has on the undertaking. They can be classified into acute physical risks, which arise from particular events (such as droughts, floods, extreme precipitations and wildfires), and chronic physical risks, which arise from longer term changes in the climate. Physical risks are a function of climate-related hazards, the exposure of the undertaking's assets and activities to these hazards, and how sensitive the undertaking is to these hazards are. Examples of climate-related hazards are heat waves, increased frequency of extreme weather events, sea level rise, glacial lake outburst flood, and change in precipitation and wind patterns. Climate-related physical risks can be identified and modelled by using climate scenarios that consider high emissions trajectories such as IPCC SSP5-8.5.

Disclosure BP 6 – Hazardous waste and radioactive waste ratio

181. Nuclear waste can be present in a variety of situations, from smoke detectors to sludges to naturally occurring radioactive materials. It can also be present in special equipment used in industry, research facilities and healthcare as well as in other objects.

182. The undertaking may disclose its share of radioactive waste, which is calculated as a percentage of the total amount of ***hazardous waste*** as reported in the Basic Module B 7.

183. Below may be found an example of the radioactive waste ratio calculation:

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$$Radioactive\ waste\ ratio = \frac{Radioactive\ waste\ (t)}{Hazardous\ waste\ (t)}\ x\ 100$$

Social Metrics

Disclosure BP 7 – Alignment with internationally recognised instruments

184. The undertaking shall disclose how it manages actual and potential negative impacts on people's human rights. This means that the undertaking shall disclose whether it has policies in place that commits it to respecting human rights, including labour rights, as defined by the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Such policies can take many forms, and they have no definitive template or structure. Efforts to implement such policies can include the provision of specific ***training*** on human rights for ***employees*** as well as efforts to map out supply chains in order to proactively identify issues related to child labour or forced labour, particularly in higher risk contexts.

185. Human rights in the workplace include the right to a safe and healthy working environment; the right to freedom of association and the right to ***collective bargaining***; the elimination of discrimination, including the right to equal pay for work of equal value; and the elimination of child labour and forced labour.

186. International instruments such as treaties, conventions, principles, and guidelines constitute the common reference ground upon which the undertaking shall develop policies related to human rights (see the CSRD Article 29 b 2 b). These policies could signal to internal and external stakeholders that an undertaking is taking steps to embed human rights in its business operations and relations.

Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations

187. A human rights ***policy*** sets out how the undertaking respects human rights by having processes in place to identify, prevent, mitigate and account for how the undertaking addresses its actual or potential adverse human rights impacts. Examples of mechanisms used to report human rights violations include the provision of channels such as ***grievance*** procedures, general complaints and whistleblower complaints through which ***employees*** can raise concerns or file complaints related to human rights, including labour rights.

Disclosure BP 9 – Violations of OECD guidelines by multinational enterprises or the UN Guiding Principles (including the principles and rights set out in the eight fundamental conventions of the ILO Declaration and the International Bill of Human Rights)

188. If applicable, the undertaking shall disclose whether there have been any violations of human rights during the reporting year. The UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises provide a comprehensive overview and list of human rights.

Disclosure BP 10 – Workforce – Work-life balance

189. The undertaking shall disclose separately the percentage of those ***employees:***

(a) who can take family-related leave in the reporting year, with a breakdown by gender, and

(b) who used family-related leave in the reporting year, with a breakdown by gender.

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190. To calculate this percentage, the same methodology used for social metrics in the Basic Module should be used for the sake of consistency, which means that ***employees*** can be counted in full-time equivalents or headcount.

191. Family-related leave includes maternity leave, paternity leave, adoption leave, parental leave, dependents' leave and carer's leave. The definition and scope of family-related leave is stipulated in national laws.

Disclosure BP 11 – Number of apprentices

192. The undertaking shall disclose the number of apprentices it has in the reporting period based on the applicable national definitions and schemes of ***apprentices***.

193. The number of apprentices refers to the number of apprentices who work in the undertaking during the reporting year. For example, if the undertaking has a December year end, an apprentice that starts their contract in year x1 and finishes in year x2 should be included in this disclosure in year x1 and year x2.

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Appendix A: Defined terms

This appendix is an integral part of this [draft] Standard.

Defined term	Definition
Actions	Actions refer to (i) actions and actions plans (including transition plans) that are undertaken to ensure that the undertaking delivers against targets set and through which the undertaking seeks to address material impacts, risks and opportunities; and (ii) decisions to support these with financial, human or technological resources.
Affected communities	People or group(s) living or working in the same area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the undertaking's operations (local communities) to those living at a distance. Affected communities include actually and potentially affected indigenous peoples.
Apprentice	Apprentice refers to a person who is serving an apprenticeship. Apprenticeships are understood as formal vocational education and training schemes that (a) combine learning in education or training institutions with substantial work-based learning in companies and other workplaces, (b) lead to nationally recognised qualifications, (c) are based on an agreement defining the rights and obligations of the apprentice, of the employer and, where appropriate, the vocational education and training institution, and (d) with the apprentice being paid or otherwise compensation for the work-based component.
Biodiversity	The variability among living organisms from all sources including, inter alia, terrestrial, freshwater, marine and other aquatic ecosystems and the ecological complexes of which they are part.
Biodiversity sensitive Area	Biodiversity sensitive areas include: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139.
Business Conduct	The following matters are collectively referred to as 'business conduct or business conduct matters': (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices, especially with regard to late payment to small and medium-sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities.
Collective bargaining	All negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more trade unions or, in their absence, the representatives of the workers duly elected and authorised by them in accordance with national laws and regulations, on the other, for: i) determining working conditions and terms of employment; and/or ii) regulating relations between employers and workers; and/or regulating relations between employers or their organisations and a workers' organisation or workers' organisations.
Corruption	Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also

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Defined term	Definition
	includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.
Consumers	Individuals who acquire, consume or use goods and services for personal use, either for themselves or for others, and not for resale, commercial or trade, business, craft or profession purposes.
Classified information	EU classified information as defined in Council Decision of 23 September 2013 on the security rules for protecting EU classified information (2013/488/EU) or classified by one of the Member States and marked as per Appendix B of that Council decision. EU classified information means any information designated by a EU security classification, of which the unauthorised disclosure could cause varying degrees of prejudice to the interests of the European Union or of one or more of the Member States. Classified information may be classified according to four levels: top secret, secret, confidential, restricted (based on the definition from the Council Decision).
Circular economy principles	The European circular economy principles are usability; reusability; repairability; disassembly; remanufacturing or refurbishment; recycling; recirculation by the biological cycle; other potential optimisation of product and material use.
Climate change adaptation	The process of adjustment to actual and expected climate change and its impacts.
Climate-related physical risks	Risks resulting from climate change that can be event-driven (acute) or from longer-term shifts (chronic) in climate patterns. Acute physical risks arise from particular hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from longer-term changes in the climate, such as temperature changes, and their effects on rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
Direct GHG emissions (Scope 1)	Direct GHG emissions from sources that are owned or controlled by the undertaking.
Employee	An individual who is in an employment relationship with the undertaking according to national law or practice.
End-users	Individuals who ultimately use or are intended to ultimately use a particular product or service.
Family related leave	Family-related leave include maternity leave, paternity leave, parental leave, and carers' leave that is available under national law or collective agreements. For the purpose of this Standard, these concepts are defined as: (a) maternity leave (also called pregnancy leave): employment-protected leave of absence for employed women directly around the time of childbirth (or, in some countries, adoption); (b) paternity leave: leave from work for fathers or, where and in so far as recognised by national law, for equivalent second parents, on the occasion of the birth or adoption of a child for the purposes of providing care;

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	(c) parental leave: leave from work for parents on the grounds of the birth or adoption of a child to take care of that child, as defined by each Member State; (d) carers' leave from work: leave for workers to provide personal care or support to a relative, or a person who lives in the same household, in need of significant care or support for a serious medical reason, as defined by each Member State.
Grievance mechanism	Any routinized, state-based or non-state-based, judicial or non-judicial processes through which stakeholders can raise grievances and seek remedy. Examples of state-based judicial and non-judicial grievance mechanisms include courts, labour tribunals, national human rights institutions, National Contact Points under the OECD Guidelines for Multinational Enterprises, ombudsperson offices, consumer protection agencies, regulatory oversight bodies, and government-run complaints offices. Non-state-based grievance mechanisms include those administered by the undertaking, either alone or together with stakeholders, such as operational-level grievance mechanisms and collective bargaining, including the mechanisms established by collective bargaining. They also include mechanisms administered by industry associations, international organisations, civil society organisations, or multi-stakeholder groups. Operational-level grievance mechanisms are administered by the organisation either alone or in collaboration with other parties and are directly accessible by the organisation's stakeholders. They allow for grievances to be identified and addressed early and directly, thereby preventing both harm and grievances from escalating. They also provide important feedback on the effectiveness of the organisation's due diligence from those who are directly affected. According to UN Guiding Principle 31, effective grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning. In addition to these criteria, effective operational-level grievance mechanisms are also based on engagement and dialogue. It can be more difficult for the organisation to assess the effectiveness of grievance mechanisms that it participates in compared to those it has established itself.
Greenhouse Gases (GHG)	For the purposes of this Standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO2); methane (CH4); nitrous oxide (N2O); Nitrogen trifluoride (NF3); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF6).
Governance	The governance is the system of rules, practices and processes by which a company is directed and controlled.
Gross greenhouse gas (GHG) emissions	Gross greenhouse gas (GHG) emissions are total emissions before deductions for carbon removals or any other adjustments are made.
Hazardous waste	Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council17 on waste.
Incident	A legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms

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Defined term	Definition
Indirect GHG emissions (Scope 2)	Indirect emissions are a consequence of the operations of the undertaking but occur at sources owned or controlled by another company. Scope 2 GHG emissions are indirect emissions from the generation of purchased or acquired electricity, steam and heat, or cooling consumed by the undertaking.
Land-use	The human use of a specific area for a certain purpose (such as residential; agriculture; recreation; industrial, etc.). Influenced by land cover (grass, asphalt, trees, bare ground, water, etc). Land-use change refers to a change in the use or management of land by humans, which may lead to a change in land cover.
Nature-oriented area	A "nature-oriented area" is an area dedicated primarily to nature preservation or restoration. They can be located on-site and include elements like roof, façade, water drainages designed, to promote biodiversity. Nature-oriented areas can also be located outside the organisation site provided that the area is owned or (co-)managed by the organisation and is primarily dedicated to promoting biodiversity. (Adapted from EMAS regulation)
Own workforce/own workers	Employees who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78).
Pay	The ordinary basic or minimum wage or salary and any other remuneration, whether in cash or in kind which the worker receives directly or indirectly ('complementary or variable components'), in respect of his/her employment from his/her employer. 'Pay level' means gross annual pay and the corresponding gross hourly pay. 'Median pay level' means the pay of the employee that would have half of the employees earn more and half less than they do
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a material sustainability matter. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is implemented through actions or action plans. For example, undertakings with less resources may have few (or no) policies formalised in written documents, but this does not necessarily mean they do not have policies. If the undertaking has not yet formalised a policy but has implemented actions or defined targets through which the undertaking seeks to address material sustainability topics and subtopics, it may disclose them.
Recordable work-related injury or ill health	Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. Recordable means diagnosed by a physician or other licensed health care professionals. Injuries that do not require medical

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	treatment beyond first aid are generally not recordable.
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations
Renewable Energy	Energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas[6].
Sealed area	A sealed area means any area where the original soil has been covered (such as roads) making it impermeable. This non-permeability can create environmental impacts. (Source: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R1221-20230712)
Sensitive information	Sensitive information as defined in Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund. Sensitive information means information and data, including classified information, that is to be protected from unauthorised access or disclosure because of obligations laid down in Union or national law or in order to safeguard the privacy or security of a natural or legal person.
Targets	Measurable, outcome-oriented and time-bound goals that the SME aims to achieve in relation to material sustainability topics and subtopics. They may be set voluntarily by the SME or derive from legal requirements on the undertaking.
Training	Initiatives put in place by the undertaking aimed at the maintenance and/or improvement of skills and knowledge of its own workers. It can include different methodologies, such as on-site training, and online training.
Value Chain	The full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. A value chain encompasses the activities, resources and relationships the undertaking uses and relies on to create its products or services from conception to delivery, consumption and end-of- life. Relevant activities, resources and relationships include: a) those in the undertaking's own operations, such as human resources; b) those along its supply, marketing and distribution channels, such as materials and service sourcing and product and service sale and delivery; and c) the financing, geographical, geopolitical and regulatory environments in which the undertaking operates. Value chain includes actors upstream and downstream from the undertaking. Actors upstream from the undertaking (e.g., suppliers) provide products or services that are used in the development of the undertaking's products or services. Entities

[6] Article 2(1) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).

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Defined term	Definition
	downstream from the undertaking (e.g., distributors, customers) receive products or services from the undertaking.
Wage	Gross wage, excluding variable components such as overtime and incentive pay, and excluding allowances unless they are guaranteed
Water consumption	The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period.
Water withdrawal	The sum of all water drawn into the boundaries of the undertaking from all sources for any use over the course of the reporting period.
Work-life balance	Satisfactory state of equilibrium between an individual's work and private life. Work-life balance in a broader sense encompasses not only the balance between work and private life given family or care responsibilities, but also time allocation between time spent at work and in private life beyond family responsibilities.
Worker in the value chain	An individual performing work in the value chain of the undertaking, regardless of the existence or nature of any contractual relationship with the undertaking. In the ESRS, the scope of workers in the value chain include all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking. This includes impacts that are connected to the undertaking's own operations, and value chain, including through its products or services, as well as through its business relationships. This includes all workers who are not in the scope of 'Own Workforce' ('Own Workforce' includes people who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in employment activities (NACE Code N78)

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Appendix B: List of sustainability matters

The appendix below is an integral part of this [draft] Standard. The compilation of sustainability topics along with their related subtopics and sub-subtopics shall be used as a basis for determining what material matters are to be reported.

Sustainability matters covered in [draft] topical ESRS		
Topic	**Sustainability matter: Sub-topic**	**Sustainability matter: sub-sub topic**
Climate change	– Climate change adaptation – Climate change mitigation – Energy	
Pollution	– Pollution of air – Pollution of water – Pollution of soil – Pollution of living organisms and food resources – Substances of concern – Substances of very high concern	
Water and marine resources	– Water – Marine resources	– Water consumption – Water withdrawals – Water discharges – Water discharges in the oceans – Extraction and use of marine resources
Biodiversity and ecosystems	– Direct impact drivers of biodiversity loss	– Climate Change – Land-use change, fresh water-use change and sea-use change – Direct exploitation – Invasive alien species – Pollution – Others
	– Impacts on the state of species	– Examples: – Species population size – Species global extinction risk
	– Impacts on the extent and condition of ecosystems	– Examples: – Land degradation – Desertification – Soil sealing
Circular economy	– Impacts and dependencies on ecosystem services – Resources inflows, including resource use – Resource outflows related to products and services – Waste	
Own workforce	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue – Freedom of association, the existence of works councils and the information, consultation and participation rights of workers

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Sustainability matters covered in [draft] topical ESRS		
Topic	**Sustainability matter: Sub-topic**	**Sustainability matter: sub-sub topic**
		– Collective bargaining, including rate of workers covered by collective agreements – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – Employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Privacy
Workers in the value chain	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue – Freedom of association, including the existence of work councils – Collective bargaining – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – The employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Water and sanitation – Privacy
Affected communities	– Communities' economic, social and cultural rights	– Adequate housing – Adequate food – Water and sanitation – Land-related impacts – Security-related impacts
	– Communities' civil and political rights	– Freedom of expression – Freedom of assembly – Impacts on human rights defenders

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Sustainability matters covered in [draft] topical ESRS		
Topic	**Sustainability matter: Sub-topic**	**Sustainability matter: sub-sub topic**
Consumers and end-users	– Rights of indigenous communities	– Free, prior and informed consent – Self-determination – Cultural rights
	– Information-related impacts for consumers and/or end-users	– Privacy – Freedom of expression – Access to (quality) information
	– Personal safety of consumers and/or end-users	– Health and safety – Security of a person – Protection of children
	– Social inclusion of consumers and/or end-users	– Non-discrimination – Access to products and services – Responsible marketing practices
Business conduct	– Corporate culture – Protection of whistle-blowers – Animal welfare – Political engagement – Management of relationships with suppliers including payment practices	
	– Corruption and bribery	– Prevention and detection including training – Incidents

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Appendix C – dedicated to financial market participants that are users of the information produced using this [draft] Standard

194. This appendix is relevant for users of the sustainability report. The table below illustrates the Sustainable Finance Datapoints that are present in different modules of this Standard.

195. The column 'DR number and Title' identifies the disclosures present in the different modules (i.e. Basic Module, Narrative-PAT Module, and Business Partners Module) that are Sustainable Finance datapoints. The column SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation illustrates how these disclosures relate to these regulations that are relevant for users of the sustainability report (banks, other investors).

Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Basic Module		
Environment	**Disclosure B 3 – Energy and greenhouse gas emissions** The undertaking shall disclose its total energy consumption in MWh, with a breakdown between: (a) fossil fuels; and (b) electricity, as expressed in utility billings (with the breakdown between renewable and non-renewable sources, if available).	**SFDR**[7]
Environment	**Disclosure B 3 – Energy and greenhouse gas emissions** The undertaking shall disclose its estimated gross greenhouse gas (GHG) emissions in tons of CO2 equivalents (tCO2eq), considering the principles, requirements and guidance of the GHG Protocol Corporate Standard, including: (a) The scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and (b) The location-based scope 2 emissions in tCO_2eq (emissions from the generation of purchased energy).	**SFDR**[8] **Benchmark** **EU Taxonomy**[9]

[7] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #5 in Table 1 of Annex I ("Share of non-renewable energy consumption and production").

[8] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint"); and Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[9] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Environment	**Disclosure B 4 – Pollution of air, water and soil** The undertaking shall disclose, if applicable, the pollutants it emits in its own operations to air, water and soil that it is required to report by law to competent authorities (e.g. under the Industrial Emissions Directive and the European Pollutant Release and Transfer Register) or required to report under an Environmental Management System such as EMAS.	**SFDR**[10]
Environment	**Disclosure B 5 – Biodiversity** The undertaking shall disclose the number and area (in hectares) of sites that it owns, that it has leased or that it manages, that are located in or near biodiversity sensitive areas.	**SFDR**[11]
Social	**Disclosure B 9 – Workforce – Health and safety** The undertaking shall disclose: (a) the number of fatalities as a result of work-related injuries and work-related ill health; (b) the number and rate of recordable work-related accidents.	**SFDR**[12] **Benchmark**
Social	**Disclosure B 10 – Workforce – Remuneration, collective bargaining and training** The undertaking shall disclose the percentage gap in pay between its female and male employees. The undertaking may omit this disclosure when its headcount is below 150 employees.	**SFDR**[13]

[10] Regulation (EU) 2019/2088 (SFDR) because it is derived from *(a)* an additional indicator related to principal adverse impacts as set out by indicator #2 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Emissions of air pollutants"); *(b)* indicator #8 in Table I of Annex I ("Emissions to water); *(c)* indicator #1 in Table II of Annex I ("Emissions of inorganic pollutants"); and *(d)* indicator #3 in Table II of Annex I ("Emissions of ozone-depleting substances").

[11] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #7 in Table 1 of Annex I ("Activities negatively affecting biodiversity-sensitive areas")

[12] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088, as reflecting an additional indicator related to principal adverse impacts as set out by indicator #2 in Table 3 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments ("Rate of accidents"), and benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Weighted average ratio of accidents, injuries, fatalities" in section 1 and 2 of Annex 2.

[13] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #12 in Table 1 of Annex I ("Unadjusted gender pay gap") and (EU) 2020/1816 Benchmark Regulation (EU), indicator "Weighted average gender pay gap" in section 1 and 2 of Annex II.

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Governance	**Disclosure B 12 – Convictions and fines for corruption and bribery** In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws.	**Benchmark**[14]
Narrative-PAT Module		
Environment	***Entity-specific consideration when reporting on GHG emissions under B 3 (Basic Module)*** When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under "B 3 – Energy and greenhouse gas emissions."	**SFDR**[15] **Benchmark** **EU Taxonomy**[16]
Governance	**Disclosure N 3 - Management of material sustainability matters** Where material, the undertaking shall disclose whether it has the following in place to support the prevention of incidents of corruption or bribery: (c) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.	**SFDR**[17]
Business Partners Module		

[14] Benchmark Regulation (EU) 2020/1816, indicator "Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws" in section 1 and 2 of Annex II.

[15] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint"); and Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[16] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088

[17] Regulation (EU) 2019/2088 (SFDR), additional indicator #17 in Table 3 of Annex I ("Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery); and (EU) 2020/1816 Benchmark Regulation, indicator "Numbers of convictions and amount of fines for violation of anti-corruption and anti-bribery laws" in section 1 and 2 of Annex II.

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Governance	**Disclosure BP 1 – Revenues from certain sectors** The undertaking shall include where applicable, a statement indicating, together with the related revenues, that the undertaking is active in: (a) controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons; and / or	**SFDR**[18] **Benchmark**[19]
	(b) the cultivation and production of tobacco; and/or	**EBA Pillar 3**[20] **Benchmark**[21]
	(c) fossil fuel (coal, oil and gas) sector (i.e., the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council17), including a disaggregation of revenues derived from coal, from oil and from gas); and/or	**SFDR**[22] **EBA Pillar 3**[23] **Benchmark**[24]

[18] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #14 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)").

[19] Benchmark Regulation (EU) 2020/1818 Article 12(1): "Administrators of EU-Paris aligned Benchmarks shall exclude all of the following companies from those benchmarks: companies involved in any activities related to controversial weapons; " and Benchmark Regulation (EU) 2020/1816 Annex II: Weighted average percentage of benchmark constituents in the controversial weapons sector."

[20] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in the manufacturing of tobacco products excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[21] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1818 as set out by paragraph b) of article 12.1. and Benchmark Regulation (EU) 2020/1816 Annex II: "Weighted average percentage of benchmark constituents in the tobacco sector."

[22] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #4 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to companies active in the fossil fuel sector")

[23] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in Mining and quarrying excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[24] Benchmark Regulation (EU) 2020/1818 Article 12(1).

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
	(d) chemicals production, i.e., its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006.	**SFDR**[25]
Governance	**Disclosure BP 2 – Gender diversity ratio in governance body** If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	**SFDR**[26] **Benchmark**[27]
Environment	**Disclosure BP 3 – GHG emissions reduction target** If the undertaking has set GHG emission reduction targets, it shall provide its GHG emission reduction targets for (a) scope 1 emissions and (b) scope 2 emissions.	**SFDR**[28] **Benchmark**[29]

[25] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #9 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Investments in companies producing chemicals").

[26] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #13 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to disclosures rules on sustainable investments ("Board gender diversity")

[27] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as set out by indicator "Weighted average ratio of female to male board members" in section 1 and 2 of Annex II.

[28] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 (SFDR) because it is derived from an additional indicator related to principal adverse impacts as set out by indicator #4 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Investments in companies without carbon emission reduction initiatives"); and is aligned with the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 6.

[29] Benchmark Regulation (EU) 2020/1818 Article 12(1), "Administrators of EU Climate Transition Benchmarks and administrators of EU Paris-aligned Benchmarks may increase in those benchmarks the weight of the issuers of the constituent securities that set and publish GHG emission reduction targets, where the following conditions are fulfilled: (a) the issuers of the constituent securities publish consistently and accurately their Scope 1, 2 and 3 GHG emissions; (b) the issuers of the constituent securities have reduced their GHG intensity or, where applicable, their absolute GHG emissions, including Scope 1, 2 and 3 GHG emissions, by an average of at least 7 % per annum for at least three consecutive years."

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Environment	**Disclosure BP 4 – Transition plan for climate change mitigation** The undertaking shall provide information about its transition plan for climate change mitigation, along with an explanation of how its GHG emission reduction targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement.	**Benchmark**[30]
Environment	**Disclosure BP 5 – Physical Risks from climate change** The undertaking shall disclose the anticipated financial effects that physical risks from climate change may have on the company, particularly (a) the monetary amount and the percentage of the undertaking's total assets that can be subjected to material physical risks over the short-, medium- and long-term before considering climate change adaptation actions disaggregated by acute and chronic physical risk; (b) the proportion of assets at material physical risk addressed by climate change adaptation actions; (c) the location of the significant assets affected by material physical risks; (d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risks over the short-,medium- and long-term; and	**Benchmark**[31] **EBA Pillar 3**[32]

[30] This information is aligned with the Regulation (EU) 2021/1119 of the European Parliament and of the Council (EU Climate Law), Article 2 (1); and with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 2.

[31] Benchmark Regulation (EU) 2020/1816 Annex II: Environmental factors to be considered by underlying assets of the benchmark.

[32] EBA Pillar 3: ITS - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk and EBA Pillar 3: ITS - Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral.

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Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
	(e) the breakdown of the undertaking's carrying value of its real state assets by energy efficiency classes.	
Environment	**Disclosure BP 6 – Hazardous waste and radioactive waste ratio** The undertaking shall disclose the total amount of hazardous waste and radioactive waste generated (radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom).	**SFDR**[33]
Social	**Disclosure BP 7: Alignment with internationally recognized instruments** The undertaking shall disclose whether its policies with regard to its own workforce are aligned with relevant internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights.	**Benchmark**[34]
Social	**Disclosure BP 8: Processes to monitor compliance and mechanisms to address violations** The undertaking shall disclose whether it has processes in place to monitor compliance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the International Bill of Human Rights and the eight fundamental conventions identified in the ILO Declaration or grievance/complaints handling mechanisms to address violations of the above standards with regard to its own workforce.	**SFDR**[35]

[33] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #9 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Hazardous waste and radioactive waste ratio").

[34] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Exposure of the benchmark portfolio to companies without due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8" in section 1 and 2 of Annex II.

[35] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #11 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments.

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Annex 1: VSME ED

Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Social	**Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO Declaration and the International Bill of Human Rights)** The undertaking shall disclose whether there have been any violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises with regard to its own workforce during the reporting year.	**SFDR**[36] **Benchmark**[37]
Social	**Disclosure BP 10 – Work-life balance** The undertaking shall disclose the percentage of employees: (a) who are entitled to take family-related leave with a breakdown by gender; and (b) who took family-related leave with a breakdown by gender. Family-related leave includes maternity, paternity, parental and carer's leave.	Financial market participants require clients to disclose measures to promote gender equality and equal opportunity. To be consistent with LSME, alignment has been sought with the metric.
Social	**Disclosure BP 11 – Number of apprentices** The undertaking shall disclose the number of apprentices in the reporting period.	Having apprentices is a matter of special relevance to undertakings in the EU in terms of job creation and training for young workers and it has been captured as a metric. To note that the apprentices' definition and regulation vary among EU Member States and the information required shall not affect their status pursuant to applicable law.

[36] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory and additional indicator related to principal adverse impacts as set out by indicator #10 in Table I of Annex I and by indicator #14 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Violations of UNGC principles and OECD Guidelines for Multinational Enterprises" and "Number of identified cases of severe human rights issues and incidents")

[37] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Number of benchmark constituents subject to social violations (absolute number and relative divided by all benchmark constituents), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law" in section 1 and 2 of Annex II.

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Annex 2: Mark-up from VSME ED

Objective of this ~~[draft]~~ Standard and to which undertakings it applies

1. The objective of this voluntary ~~[draft]~~ Standard is to support micro-, small- and medium-sized undertakings in:

   (a) providing information that will help satisfy the data needs of large undertakings requesting sustainability information from their suppliers;

   (b) providing information that will help satisfy data needs from banks ~~lenders/credit providers~~and investors, therefore helping undertakings in their access to finance;

   ~~(a) contributing to a more sustainable and inclusive economy;~~

   ~~(b)~~(c) improving the management of the sustainability issues they face, i.e., environmental and social challenges such as pollution, workforce health and safety. This will support their competitive growth and enhance their resilience in the short-, medium- and long-term; and

   (d) contributing to a more sustainable and inclusive economy.

   ~~(c) providing information that will help satisfy data demand from lenders/credit providers and investors, therefore helping undertakings in their access to finance;~~

   ~~(d) providing information that will help satisfy the data demand needs of large undertakings requesting sustainability information from their suppliers.~~

2. This [draft] Standard is voluntary. It ~~and~~ applies to micro-, small- and medium-sized undertakings[1] whose securities are not admitted to trading on a regulated market in the European Union (not listed). [Article 3 of Directive 2013/34/EU] defines ~~and distinguishes~~ three categories of small and medium-sized undertakings based on their balance sheet total, their net turnover and their average number of ***employees*** during the financial year.

   (a) An undertaking is micro if it does not exceed two of the following thresholds:

      i. €~~350~~450,000 in balance sheet total~~;~~,
      ii. €~~700~~900,000 in net turnover~~;~~, and
      iii. an average of 10 employees.

   (b) An undertaking is small if it does not exceed two of the following thresholds:

      i. €45 million in balance sheet total,
      ii. €810 million in net turnover~~;~~, and~~or~~
      iii. an average of 50 employees.

   (c) An undertaking is medium if it does not exceed two of the following thresholds:

      i. €~~20~~25 million in balance sheet total,
      ii. €~~40~~50 million in net turnover~~;~~, and
      iii. an average of 250 employees.

3. These undertakings fall outside the scope of the Corporate Social Reporting Directive (CSRD) but are encouraged to use this ~~[draft]~~ Standard ~~to prepare and share with whomever such sustainability information may concern~~. This ~~[draft]~~ Standard covers the same sustainability issues as the European Sustainability Reporting Standards (ESRS) for large undertakings. However, it is ~~based upon the key concept of~~ proportionate~~lity~~ and therefore takes into account micro-, small- and

[1] This includes self-employed, non-incorporated undertakings and listed micro undertakings.

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medium-sized undertakings' fundamental characteristics. Micro undertakings are welcome to use only certain parts of this [draft] Standard as highlighted in paragraph 5-(a).

~~4.~~ Consistency with ESRS for large undertakings has been carefully considered in the preparation of this ~~[draft]~~ Standard, while defining proportionate requirements. This ~~[draft]~~ Standard has no legal authority, unlike the ESRS for large undertakings. ~~It provides undertakings that are outside the scope of the CSRD (see paragraph 2) with a voluntary tool for sustainability reporting.~~

~~5.~~4.

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Modules that constitute this ~~[draft]~~ Standard

~~6.~~5. This [draft] Standard ~~includes~~ has ~~two~~three modules that the undertaking can use to prepare ~~as the basis for preparation of~~ its sustainability report:

(a) **Basic Module:** Disclosures B 1 and,~~-~~ B 2 and Basic Metrics (B 3 ~~–~~to B ~~12~~11). This module is the target approach for micro-undertakings and constitutes a minimum requirement for other undertakings; and. ~~Materiality analysis is not required, but disclosures B 3-B 12 are to be provided when they are applicable to the undertaking's specific circumstances.~~

~~(b) **Narrative Policies, Actions and Targets (PAT) Module**: This module defines narrative disclosures (N1 – N5) in relation to Policies, Actions and Targets (PAT), which are to be reported in addition to disclosures B 1-B 12 if the undertaking has them in place. This module is suggested to undertakings that have formalised and implemented the PAT. Materiality analysis is required in order to disclose which of the sustainability matters in Appendix B are relevant for the undertaking's business and organisation (see Principles of Materiality below).~~

~~(c)~~(b) ~~**Business Partners (BP)**~~**Comprehensive Module:** This module sets datapoints ~~to be reported~~ in addition to disclosures B 1-B ~~12~~11, which are likely to be requested by ~~included in data requests from~~ lenders, investors and corporate clients of the undertaking on top of the Basic Module. ~~Materiality analysis is required in order to disclose which of the sustainability matters in Appendix B are relevant for the undertaking's business and organisation (see Principles of Materiality below). If the undertaking prepares also the Narrative (PAT) Module, the material matters are disclosed only once.~~

Paragraph ~~21~~24 below illustrates the available options for the preparation of a sustainability report using this [draft] Standard by adopting one or more of these modules. Once chosen, a module shall be complied with in its entirety (with flexibility allowed under paragraph ~~19), providing information in~~22); however, each ~~disclosure that is~~ item of disclosure shall be provided only when it is applicable to the undertaking's specific circumstances ~~or it is considered relevant to the undertaking's business and organisation~~.

~~7.~~6. Applying the Basic Module is a prerequisite for applying the ~~Narrative PAT and/or the Business Partners Modules~~Comprehensive Module.

~~8.~~7. Appendix A *Defined terms* includes the definitions of the terms used in this [draft] Standard. Throughout the VSME Standard ~~ED~~, the terms ~~that are~~ defined in the glossary of definitions (Appendix A) are set~~put~~ in ***bold italics***, except when a defined term is used more than once in the same paragraph.

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Principles for the preparation of the sustainability report (Basic and Comprehensive Module~~, Narrative-PAT Module, Business Partners Module)~~

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~~9. This section incudes principles that shall be applied when the undertaking prepares its sustainability report using any of the three modules described above.)~~

Complying with this Standard

~~10.~~8. This [draft] Standard sets requirements that allow the undertaking to provide relevant information on:

(a) how ~~its business~~it has had and is likely to have a positive or negative impact on people or on the environment in the short, medium or long term; and

(b) ~~which and~~ how environmental and social issues have affected or are likely to affect its financial position, performance and cash flows~~.~~ in the short, medium or long term.

~~11.~~9. The ~~sustainability report~~ undertaking shall report~~provide~~ information that is relevant, faithful, comparable, understandable and verifiable.

~~12.~~10. Depending on the type of activities carried out by the undertaking, the inclusion of additional information (metrics and/or narrative disclosures) not covered in this [draft] Standard is appropriate in order to disclose sustainability issues that are common in the undertaking's sector (i.e. typically encountered by businesses or entities operating within a specific industry or field) or that are specific to the undertaking, as this supports the preparation of relevant, faithful, comparable, understandable and verifiable information. This includes the consideration of information on Scope 3 GHG emissions (see paragraphs ~~504~~8 to ~~53~~4 of this [draft] Standard on the consideration when reporting on GHG emissions under B3). ~~A~~Appendix B provides a list of possible sustainability issues.

11. The undertaking may complement the metrics from the Basic and Comprehensive modules with additional qualitative and/or quantitative information where appropriate in accordance with paragraph 10 above.

Comparative information

12. The undertaking shall report comparative information in respect of the previous year, except for metrics disclosed for the first time. The undertaking shall report comparative information from the second year of reporting.

If applicable principle

13. Certain disclosures only apply to specific circumstances[2]. In particular, the instructions provided in each disclosure specify ~~the~~such circumstances and the information that is to be reported only if considered 'applicable' by the undertaking. When one of these disclosures is omitted, it is assumed to not be applicable.

~~***Preparation on a consolidated basis***~~ ***Inclusion of subsidiaries in the reported data***

~~13.~~14. If the undertaking is a parent company of a group, it is recommended that it prepares its sustainability report on a consolidated basis, including ~~the~~ information from~~of~~ its subsidiaries.

[2] For example, the legal requirement to disclose specific information, or already voluntarily disclosing specific information through an Environmental Management System.

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15. If the parent undertaking has prepared its sustainability report on a consolidated basis, including information from its subsidiaries, the subsidiary undertakings are exempted from reporting.

Timing and location of the sustainability report

~~14.~~16. ~~The~~If a sustainability report is prepared to ~~meet the~~meet the needs of large undertakings or lenders that require an update annually, it shall be prepared ~~on an annual basis~~annually. If the undertaking preparers financial statements, ~~it~~the sustainability report shall be prepared with a period of time that is consistent with the preparation of the financial statement. ~~It shall be available for issuance at the same time as the financial statements if they are prepared~~. If specific datapoints did not change from the previous reporting year, the undertaking may indicate that no changes occurred and refer~~shall either disclose~~ to the information provided for that specific datapoint ~~from~~ in the previous year's report. ~~or indicate that no changes have occurred.~~

~~15.~~17. ~~The~~The primary function of this report is to inform actual or potential business counterparties. The undertaking may decide to make its sustainability report available to the public. In this case, the undertaking may present its sustainability report in a separate section of the management report if ~~the latter is required by applicable law and regulations or if the management report is prepared voluntarily~~it has one. Otherwise, the undertaking may present its sustainability report as~~in~~ a ~~different~~ separate document.

~~16.~~18. To avoid publishing the same information twice, the undertaking may refer in its sustainability report to disclosures published in other documents that can be accessed at the same time as the sustainability report[3].

Classified and sensitive information ~~and information on intellectual property, know-how or results of innovation~~

~~17.~~19. When the provision of the disclosures in this [draft] Standard ~~would~~ require disclosing classified or ***sensitive information***, the undertaking may omit such information~~, even if it is considered material. The~~. If the undertaking ~~may~~decides to omit such ~~classified or sensitive~~ information ~~if:~~, it shall state that this is the case under disclosure B 1 (see paragraph 24).

~~(a) the information has commercial value because it is secret; and~~

~~(b) its publication will likely negatively affect the financial performance or position of the undertaking.~~

~~If the undertaking decides to omit such information, it shall simply state that is the case under Disclosure B 1 (see paragraph 21).~~

Coherence and linkages with disclosures in financial statements

20. If the undertaking also prepares financial statements, the information provided in its sustainability report following this ~~[draft]~~ Standard shall:

(a) ~~shall~~ be coherent with what is reported in the financial statements for the same period; and

(b) may be presented in a way that facilitates the understanding of the linkages that exist with the information reported in financial statements, for example, by using appropriate cross-references.

[3] In a future online tool version of the VSME Standard, when appropriate, the undertaking may refer to disclosures published in other documents rather than the sustainability report using incorporation by reference. Such reference is made by including the page number of the relevant source, provided that the PDF format of the source document is also made available in the online tool version.

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Basic Module

~~18.~~ The undertaking shall report on its environmental, social and ***business conduct*** issues (together 'sustainability issues') using the B 1~~- to B 1211~~ disclosures below. ~~Comparative information in respect of the previous year shall be included in the report except for metrics being disclosed for the first time. The inclusion of comparative information shall begin the second year of reporting and continue henceforth.~~

~~2. Disclosures B 1-B 12 are to be reported, and no materiality analysis is needed. Certain disclosures only apply to specific circumstances. In particular, the following instructions specify that, in these circumstances, the information is to be reported only if considered 'applicable' by the undertaking. When one of these disclosures is omitted, it is assumed to be not applicable.~~

~~21. The undertaking may complement the metrics from B 3 to B 12 with additional qualitative and/or quantitative information, where appropriate, in accordance with paragraph 11 above.~~

~~19.~~22. ~~If t~~The undertaking ~~that~~ wants to provide more comprehensive information, it may also integrate the metrics required from B ~~3~~1 to B ~~1211~~ with disclosures, selecting them from the ~~Narrative PAT Module and/or from the Business Partners~~Comprehensive Module.

~~20.~~23. Additional guidance on disclosures ~~Instructions supporting the preparation of metrics~~ B ~~3~~-1 to B ~~1211~~ are available in paragraphs 66 to ~~221~~209. ~~in the Basic Module guidance, which is found on pages 19 through 34 of this [draft] Standard.~~

Basic Module – ~~Cross-cutting Metrics~~~~Disclosure~~General information

B-1 – Basis for preparation

~~21.~~24. The undertaking shall disclose:

(a) which of the following options it has selected ~~in the preparation of its sustainability report using this [draft] Standard~~:

i. OPTION A: Basic Module (only); or

ii. OPTION B: Basic Module and ~~Narrative PAT~~Comprehensive Module~~;~~.

~~iii. OPTION C: Basic Module and Business Partners Module; or~~

~~iv. OPTION D: Basic Module, Narrative PAT Module and Business Partner Module;~~

(b) if the undertaking has omitted a disclosure as it is deemed ***classified or sensitive information*** (see paragraph 19), the undertaking shall indicate the disclosures that has omitted.

~~(b)~~(c) whether the sustainability report has been prepared on an individual basis (i.e., the report is limited ~~only~~ to the undertaking's information only) or on a consolidated basis (i.e., the report includes information about~~of~~ the undertaking and its subsidiaries~~) or on an individual basis (i.e., the report is limited only to the information of the undertaking); and~~);

~~(c)~~(d) in case of a consolidated sustainability report, the list of the subsidiaries, including their registered address[4], covered in the ~~consolidated sustainability~~ report~~.~~; and

(e) the following information:

i. the undertaking's legal form;

[4] The registered address is the official address of the undertaking. ~~Providing the registered address is a legal requirement, and it is available on public record.~~

ii. NACE sector classification code(s);

iii. size of the balance sheet (in Euro);

iv. turnover (in Euro);

v. number of employees in headcount or full time equivalents;

vi. country of primary operations and location of significant asset(s); and

~~—~~geolocation of ***sites*** owned, leased or managed.

25. If the undertaking has obtained any sustainability-related certification or label, it shall provide a brief description of those (including, where relevant, the issuers of the certification or label, date and rating score).

B ~~2~~ – Practices, policies and future initiatives for transitioning towards a more sustainable economy

26. ~~When~~If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, it shall ~~briefly describe them~~ state so. The undertaking shall state whether it has: ~~Such practices, policies and future initiatives include what the undertaking does to reduce its negative impacts and to enhance its positive impacts on people and on the environment, in order to contribute to a more sustainable economy. Appendix B provides a list of possible sustainability issues.~~

~~a. If the undertaking has practices, formal sustainability policies, future initiatives and targets in place, it shall describe state whether it has:~~

a. practices. Practices in this context may include, for instance, efforts to reduce the undertaking's water and electricity consumption, to reduce GHG emissions or to prevent pollution, and initiatives to improve product safety as well as current initiatives to improve working conditions and equal treatment in the workplace, sustainability training for the undertaking's workforce and partnerships related to sustainability projects;

b. ~~formal~~ policies on sustainability issues, whether they are publicly available, ~~and~~ any separate environmental, social or governance policies~~y~~ for addressing sustainability issues;

c. any future initiatives or forward-looking plans that are being implemented on sustainability issues; and

d. targets to monitor the implementation of the policies and the progress achieved towards meeting such targets.

27. Such practices, policies and future initiatives include what the undertaking does to reduce its negative ***impacts*** and to enhance its positive impacts on people and the environment, in order to contribute to a more sustainable economy. Appendix B provides a list of possible sustainability issues that could be covered in this disclosure. The undertaking may use the template found in paragraph 78 to report this information.

28. If the undertaking also reports on the Comprehensive module, it shall complement the information provided under B2 with the datapoints found in C2.

Basic metrics – Environment

B ~~3~~ – Energy and greenhouse gas emissions

~~3. The undertaking shall report on its impacts on climate by disclosing its energy usage and greenhouse gas emissions as requested in the following paragraphs.~~

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4. The undertaking shall disclose its total energy consumption in MWh, with a breakdown between:

(a) fossil fuels; and

(b)29. electricity as reflected in utility billings, along with a breakdown between renewable and non-renewable sourcesas per the table below, if it can obtain the necessary information to provide such a breakdownavailable.:

	Renewable	Non-renewable	Total
Electricity (as reflected in utility billings)			
Fuels			
Total			

22.30. The undertaking shall disclose its estimated ***gross greenhouse gas (GHG) emissions*** in tons of CO_2 equivalentsequivalent (tCO_2eq) considering the content of the GHG Protocol Corporate Standard, including:

(a) the Scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and

(b) the location-based Scope 2 emissions in tCO_2eq (i.e., emissions from the generation of purchased energy, such as electricity, heat, steam or cooling).

31. The undertaking shall disclose its GHG intensity calculated by dividing 'gross greenhouse gas (GHG) emissions' disclosed under paragraph 30 by 'turnover (in Euros)' disclosed under paragraph 24 (e) (iv).[5]

B 4 – Pollution of air, water and soil

23.32. The If the undertaking shall disclose, if applicable, the pollutants (with respective amounts) it emits to air, water and soil in its own operations, that it is already required by law or other national regulations to report to competent authorities (e.g. under the Industrial Emissions Directive and the European Pollutant Release and Transfer Register) or that it already its emissions of pollutants, or if it voluntarily reports on them according to an Environmental Management System such as Eco-Management and Audit Scheme (EMAS)., it shall disclose the pollutants it emits to air, water and soil in its own operations with the respective amount for each pollutant. If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.

B 5 – Biodiversity

5. The undertaking shall disclose, if applicable, metrics related to its impacts on ***biodiversity***, ecosystems and ***land-use*** as requested in the following paragraphs.

24.33. The undertaking shall disclose the number and area (in hectares) of ***sites*** that it owns, has leased, or manages in or ***near*** a ***biodiversity sensitive areas***.

[5] In a future online tool version of the VSME Standard, this will be automatically calculated.

~~25.~~34. The undertaking may disclose metrics related to ***land-use*** ~~such as~~:

(a) total use of land~~;~~ (in hectares);

(b) total sealed area;

(c) total ***nature-oriented area*** on-site; and

(d) total ***nature-oriented area*** off-site.

B 6 – Water

~~26.~~35. The undertaking shall disclose its total ***water withdrawal***, i.e., the amount of water drawn into the boundaries of the organisation (or facility); in addition, the undertaking shall separately present the amount of water withdrawn at ***sites*** located in areas of high water - stress.

~~27.~~36. If the undertaking has production processes in place which significantly consume water (e.g. thermal energy processes like drying or power production, production of goods, agricultural irrigation, etc.), it ~~If applicable, the undertaking~~ shall disclose its ***water consumption***, calculated as the difference between its ***water withdrawal*** and water discharge from its production processes.

B 7 – Resource use, circular economy and waste management

~~28.~~37. The undertaking shall disclose ~~how it manages resource use, its waste management practices and~~ whether it applies ***circular economy principles*** and, if so, how it applies these principles.

~~29.~~38. The ~~disclosure~~undertaking shall ~~include~~disclose:

~~(a) if the undertaking operates manufacturing, construction and/or packaging processes: the recycled content in the products (goods and materials) and their packaging produced by the undertaking;~~

~~(b) if the undertaking operates manufacturing, construction and/or packaging processes: rates of recyclable content in the products and their packaging produced by the undertaking;~~

~~(c)~~(a) the total annual generation of waste ~~in units of weight (preferably) or volume~~ broken down by type (non-hazardous and hazardous); ~~and~~

~~(d)~~(b) the total annual waste diverted to recycling or reuse ~~expressed in units of weight (e.g., kg or tonnes).~~; and

(c) if the undertaking operates in a sector using significant material flows (for example manufacturing, construction, packaging or others), the annual mass-flow of relevant materials used.

Basic ~~metrics~~ Module – Social ~~matters~~metrics

B 8 – Workforce – General characteristics

~~30.~~39. The undertaking shall disclose the ~~total~~ number of employees in headcount or full-time ~~equivalents or provide a headcount of such employees broken down by~~equivalent for the following metrics:

(a) type of employment contract (temporary or permanent);

(b) gender; and

~~(c) country if applicable.~~

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(c) country of the employment contract, if the undertaking operates in more than one country.

40. If the undertaking employs 50 or more ***employees***, it shall disclose the employee turnover rate for the reporting period.

B 9 – Workforce – Health and safety

~~31.~~41. The undertaking shall disclose the following information regarding its ***employees***:

~~a.~~(a) the number and rate of ***recordable work-related*** accident; and

~~b.~~(b) the number of fatalities as a result of work-related injuries and work-related ill health.

B 10 – Workforce – Remuneration, collective bargaining and training

~~32.~~42. The undertaking shall disclose:

(a) ~~when a significant proportion of~~ whether the employees ~~are compensated based on ***wages*** subject to~~receive ***pay*** that is equal or above applicable minimum wage ~~rules, the relevant ratio of~~for the ~~entry level wage to~~country it reports on, determined directly by the national minimum wage~~;~~ law or through a collective bargaining agreement;

(b) the percentage gap in ***pay*** between its female and male ***employees***. The undertaking may omit this disclosure when its ~~head count~~headcount is below 150 employees noting that this threshold will be reduced to 100 employees from 7 June 2031;

(c) the percentage of ***employees*** covered by collective bargaining agreements; and

(d) the average number of annual ***training*** hours per ***employee***, broken down by gender~~, that are related to the development of skills and competences, whether acquired through formal or informal forms of capacity building~~.

~~**B 11 – Workers in the value chain, affected communities, consumers and end-users**~~

~~6. The undertaking may disclose whether it has a process in place for identifying if there are ***value chain*** workers, ***affected communities***, or ***consumers*** and end users who are affected or are likely to be affected by severe negative impacts in relation to the undertaking's operations (i.e., its products, services and activities). In that case, the undertaking may describe this process. If identified, the undertaking may also describe the types of impacts, including where they arise and the groups that are affected by them.~~

Basic ~~metrics~~ Module – ~~Business conduct~~Governance metrics

B ~~12~~11 – Convictions and fines for corruption and bribery

~~33.~~43. In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.

~~Principles for the preparation of the sustainability report (Narrative-PAT, Business Partners)~~

~~7. This section includes principles that shall be applied when the undertaking prepares its sustainability report using the Narrative PAT Module and/or the Business Partners Module.~~

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Time horizons

8. When preparing its sustainability report, the undertaking shall adopt the following time horizons:

(a) for the short term time horizon, one year;

(b) for the medium term time horizon, from two to five years; and

(c) for the long term time horizon, more than five years.

Coherence and linkages with disclosures in financial statements

34. When the undertaking also prepares financial statements and other regulatory reports, the information provided in its sustainability report following this [draft] Standard:

(a) shall be coherent with what is reported in the financial statements for the same period; and

(b) may be presented in a way that facilitates the understanding of the linkages that exist with the information reported in financial statements, for example, by using appropriate cross-references.

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Principles of materiality to be applied in the preparation of Narrative-PAT and Business Partners Modules

9. Issues connected to environmental, social and/or ***business conduct*** aspects identified in this context are referred to as sustainability matters. This section explains how to identify sustainability matters that are 'material', meaning 'relevant', and therefore to be reported.

10. Materiality refers to the significance to the undertaking of both a sustainability matter and information about the sustainability matter. Materiality analysis is the process of identifying sustainability matters that undertakings should report on. The undertaking is encouraged to use the list contained in Appendix B *List of sustainability matters* of this [draft] Standard as guidance for the identification of its material sustainability matters. The materiality analysis does not apply to an undertaking that decides to only apply the Basic Module.

11. As part of its materiality analysis, the undertaking will assess impacts that it has or is likely to have on people and the environment as well as financial risks and opportunities that derive or may derive from sustainability matters. Identifying which sustainability matters are material is a necessary step particularly when minimising or avoiding negative impacts. At the same time, it can help the undertaking to improve its products or services or to develop new ones that address environmental or social challenges. Understanding financial risks allows the undertaking to reduce operational costs and avoid fines, litigations and reputational damages.

12. When assessing whether a sustainability matter is to be reported on because it is material to the undertaking, two dimensions have to be considered, namely impact materiality and financial materiality. This is what is generally referred to as double materiality analysis.

Impact materiality

13. From the impact perspective, a sustainability matter is to be reported on when it gives rise to material impacts. This includes:

    (a) actual or potential impacts on people or on the environment over the short, medium, and long-term time horizons. An impact is actual when it is already happening, whereas an impact is potential when it is likely to happen; and

    (b) impacts connected to the undertaking's own business operations, products and services as well as through its business relationships, such as those that arise from the operations of suppliers.

14. To determine if an actual negative impact is material, the undertaking has to consider the severity of the impact in question on people and the environment severity is based on:

    (a) scale, i.e., how grave the harm caused to people or to the environment is (e.g., a minor injury at work without days lost is placed lower on the scale than a fatality at work; inadequate industrial waste disposal leading to soil pollution within a local facility is placed lower on the scale than a leak of harmful chemicals in a river leading to severe damage of ecosystem and wildlife);

    (b) scope, i.e., how widespread the harm caused to people or to the environment is (e.g., the number of people affected or the size of contaminated land); and

    (c) the irremediable character of the impact, that is, whether and to what extent it is possible to remediate the harm caused to people or to the environment (e.g., cleaning up the contaminated land, issuing compensations and/or indemnities for affected people).

15. The consideration of scale, scope and irremediability is meant to guide undertakings when analysing the severity of its impacts. The undertaking, however, is not expected to report on details related to each of these three aspects.

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16. For potential impacts, the undertaking has to consider both severity and likelihood of occurrence. In the case of a potential negative impact on human rights, the severity of the impact takes precedence over its probability.

17. Quantitative measures of impacts yield the most objective evidence that can be collected to assess their materiality. However, quantitative data is not always available or may be costly to produce. Qualitative analysis can be sufficient for the undertaking to reasonably conclude whether a matter is material or not.

Financial materiality

18. From a financial perspective, a sustainability matter is material if it pertains to financial risks that could be reasonably expected to have material financial effects materially influencing the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital over short , medium or long term time horizons. In addition to the undertaking's business operations, matters related to the undertaking's business relationships with other companies should also be considered.

19. Material impacts generated by the undertaking generally constitute a source of financial risk. However, the undertaking shall also consider risks that are not related to its material impacts.

20. Like risks, financial opportunities related to a sustainability matter may generate financial effects. Reporting on financial opportunities is optional when preparing a sustainability report under this [draft] Standard.

21. Dependencies on natural and social resources may trigger financial risks in two ways:

(a) they may influence the undertaking's ability to continue to use or obtain the resources needed in its business processes as well as the quality and pricing of those resources; and

(b) they may affect the undertaking's ability to rely on business relationships on acceptable terms.

22. To determine whether a financial risk is material, the undertaking shall assess the probability, the nature and the potential magnitude of the financial effects on the undertaking.

Stakeholders and their relevance to the materiality analysis process

23. Stakeholders are those individuals or groups of people who can exercise influence over the undertaking and/or be affected by the activities of the undertaking. There are two main groups of stakeholders:

(a) affected stakeholders, i.e., individuals or groups of people whose interests are or could be – positively or negatively – affected by the undertaking's activities and its business relationships; and

(b) users of the sustainability report, including investors, lenders, business partners, social partners and civil society organisations.

24. Some stakeholders may belong to both groups defined in paragraph 56. An undertaking may engage with stakeholders in its materiality analysis to find out which sustainability matters are the most important to them. In many cases, micro undertakings will only consider the views of their most relevant stakeholders among those mentioned in paragraph 56.

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Narrative – Policies, Actions and Targets (PAT) Module

Disclosure N 1 – Strategy: business model and sustainability – related initiatives

35. The undertaking shall disclose the key elements of its strategy and its business model, including:

(a) a description of significant groups of products and/or services offered;

(b) a description of significant market(s) the undertaking operates in (B2B, wholesale, retail, countries);

(c) a description of main business relationships (such as key suppliers, customers distribution channels and ***consumers***); and

(d) if applicable, a description of the key elements of its strategy that relate to or affect sustainability matters.

Disclosure N 2 – Material sustainability matters

25. The undertaking shall disclose the material sustainability matters resulting from its materiality analysis (see paragraphs 42 through 57), including a brief description of each sustainability matter (listed in accordance with paragraph 43) and of:

(a) how each matter has an impact on people or the environment;

(b) its actual and potential effects on the undertaking's present or future financial position and performance; and

(c) its actual and potential effects on the undertaking's activities and strategy.

Disclosure N 3 – Management of material sustainability matters

26. The undertaking shall disclose how it manages its material sustainability matters, including:

(a) whether it has adopted policies or ***actions*** to *(i)* prevent, *(ii)* mitigate and/or *(iii)* remediate actual or potential negative impacts and/or to *(iv)* address financial risks. If applicable, the undertaking may refer to the [due diligence] or risk management processes implemented;

(b) if it has policies in place, it shall describe:

i. the objective(s) of the ***policy*** and which material sustainability matters it addresses;

ii. the scope of the ***policy*** in terms of activities, ***value chain*** and countries where the undertaking is active;

iii. if applicable, affected stakeholder groups addressed by the ***policy***;

iv. if applicable, a reference to third party standards or initiatives that the undertaking commits to respect through the implementation of the ***policy***; and

v. the ***targets*** the undertaking uses to monitor the implementation of the ***policy*** and the progress achieved;

(c) if it has put ***actions*** in place, it shall describe:

i. the list of key ***actions*** taken in the reporting year and of the actions planned for the future;

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ii. the scope of those ***actions*** (i.e., whether they also address actors in the ***value chain***, whether they are implemented in different location and geographies or which affected stakeholder groups they address);

iii. the time horizon under which the undertaking intends to complete each key action; and

iv. the ***targets*** the undertaking uses to monitor the ***actions*** implemented and the progress achieved.

27. Where material, the undertaking shall disclose the ***actions*** taken in the reporting period to improve its energy efficiency and to reduce its greenhouse gas emissions as well as the related possible implications in terms of financial risks and, if applicable, opportunities.

28. When the undertaking considers that negative impacts are material in relation to *(i)* workers in the ***value chain***, *(ii)* ***consumers*** and ***end-users*** and/or *(iii)* ***affected communities***, it may disclose:

(a) the policies that it has adopted to manage those material impacts as well as the associated material risks;

(b) the ***actions*** it has taken on material impacts, its approach to managing material risks, and the effectiveness of those actions; and

(c) the ***targets*** related to managing material negative impacts and managing material risks.

29. These disclosures are limited to the description of the policies, ***actions*** and ***targets*** that the undertaking has put in place.

30. Where material, the undertaking shall disclose whether it has the following in place to support the prevention of ***incidents*** of ***corruption*** or bribery:

(a) separation of duties; and/or

(b) ***training*** for its ***employees;*** and

(c) any ***actions*** taken to address breaches in procedures and standards of anti corruption and anti bribery.

Disclosure N 4 – Key stakeholders

31. If the undertaking engages with stakeholders, it may disclose:

(a) the categories of key stakeholders being considered (the undertaking can use categories such as investors, lending banks/creditors, business partners, trade unions, NGOs, etc.); and

(b) a brief description of the engagement activities.

Disclosure N 5 – Governance: responsibilities in relation to sustainability matters

32. The undertaking shall describe its ***governance*** and responsibilities in relation to sustainability matters. If applicable, this disclosure shall cover roles and responsibilities of the highest governance body or of the individual(s) in charge of managing sustainability matters within the undertaking.

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~~Business Partners Module~~ Comprehensive Module

33. ~~This module provides additional datapoints in relation to the information that is generally needed by the undertaking's business partners, investors and lenders. They are expected to address data requests that the undertaking receives or is likely to receive from lenders, investors, which require sustainability data from their suppliers. In relation to the information needs of financial market participants, these additional datapoints~~This module provides disclosures to address in a comprehensive way the information needs of the undertaking's business partners, such as investors, ~~lenders~~banks and corporate clients in addition to the ones included in the Basic Module. The disclosures in this module reflect ~~their~~the financial market participants' respective obligations under relevant laws and regulations. ~~They are also relevant for~~They also reflect the information needed by the business partners ~~when they~~, to assess the sustainability risk profile of the undertaking, e.g. as a (potential) supplier or a (potential) ~~supplier.~~ borrower.

~~36.~~44.

~~*List of material matters*~~

34. ~~In this module, the materiality analysis described in paragraphs 42 through 57 is required. The undertaking shall disclose the material sustainability matters resulting from its materiality analysis based on the list provided in Appendix B: *List of sustainability matters*.~~

~~Disclosures in the *Business Partners*~~Comprehensive ~~Module~~

~~37.~~45. The text below provides the list of disclosures from ~~BP1~~C 1 to ~~BP 11~~C 9 to be considered and reported upon, if they are applicable ~~or if they are considered relevant~~ to the undertaking's business and organisation~~, following the materiality analysis performed by the undertaking in line with paragraphs from 42 to 57.~~. When one of these disclosures is omitted, it is assumed to not be applicable. ~~When not reported upon, a disclosure shall be assumed to be 'not material'~~applicable' ~~for the undertaking.~~

~~38.~~46. Additional guidance on disclosures C1 to C9 is available in paragraphs ~~224~~210 to ~~256~~244. ~~Instructions to support the preparation of disclosures form BP 1- BP 11 are available in the Business Partners Module guidance on pages 35 through 38 of this [draft] Standard.~~

Comprehensive Module – ~~Cross-cutting Metrics~~General information

C1 – Strategy: Business Model and Sustainability – Related Initiatives

47. The undertaking shall disclose the key elements of its business model and strategy, including:

(a) a description of significant groups of products and/or services offered;

(b) a description of significant market(s) the undertaking operates in (such as B2B, wholesale, retail, countries);

(c) a description of main business relationships (such as key suppliers, customers distribution channels and ***consumers***); and

(d) if the strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements.

C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

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48. If the undertaking has put in place specific practices, ***policies*** or future initiatives for transitioning towards a more sustainable economy, which it has already reported under disclosure B2 in the Basic Module, it shall briefly describe them ~~using~~. The undertaking may use the template found in paragraph ~~225~~213 for this purpose.

~~39.~~49. The undertaking may indicate, if any, the most senior level of the undertaking accountable for implementing them.

Comprehensive Module - Environmental Metrics

~~Entity-specific c~~Consideration when reporting on GHG emissions under B 3 (Basic Module)

~~40.~~50. Depending on the type of activities carried out by the undertaking, disclosing a quantification of its Scope 3 GHG emissions can be appropriate in the undertaking's sector yield relevant information (see paragraph ~~11~~10 of this [draft] Standard) to yield relevant information on the undertaking's ***value chain*** impacts on climate change.

51. Scope 3 emissions are ***indirect GHG emissions*** (other than Scope 2) that derive from an undertaking's ***value chain***. They include the activities that are upstream of the undertaking's operations (e.g., purchased goods and services, purchased capital goods, transportation of purchased goods, etc.) and activities that are downstream of the undertaking's operations (e.g., transport and distribution of the undertaking's products, use of sold products, investments, etc).

~~41.~~52. If the undertaking decides to provide this metric, it should refer to the 15 types of Scope 3 GHG emissions identified by the GHG Protocol Corporate Standard and detailed by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. When it reports on Scope 3 GHG emissions, the undertaking shall include~~s~~ significant Scope 3 categories (as per the Corporate Value Chain (Scope 3) Accounting and Reporting Standard) based on its own assessment of relevant Scope 3 categories. Undertakings can find further guidance on specific calculation methods for each category in the GHG Protocol's "~~"~~Technical guidance for Calculating Scope 3 Emissions~~"~~.

~~42.~~53. When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under "B 3 – Energy and greenhouse gas emissions."

~~Disclosure BP~~C 3 – GHG ~~emissions~~ reduction ~~target~~targets and climate transition

~~43.~~54. If the undertaking has established ~~set~~ GHG emission reduction targets, it shall ~~provide~~ disclose its ~~GHG emission reduction~~ targets ~~for~~in absolute value for scope 1 and scope 2 emissions. In line with paragraphs 50 to 53 above and depending on the nature of its activities, the undertaking shall also provide targets for significant Scope 3 emissions. In particular, it shall provide:

~~(a) scope 1 emissions; and~~

~~(b) scope 2 emissions.~~

~~35. This disclosure includes Scope 3 emissions, only when they are disclosed under paragraph 71 above and the undertaking has set GHG emission reduction targets for Scope 3 emissions.~~

~~Disclosure BP 4 – Transition plan for climate change mitigation~~

(a) t~~T~~he target year and target year value;

(b) the base year and base year value;

(c) the units used for targets;

(d) the share of the Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns; and

(e) a list of main actions it seeks to implement to achieve its targets.

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~~44.~~55. If the undertaking ~~shall provide information about its~~that operates in high climate impact sectors[6] has adopted a transition plan for climate change mitigation ~~with an~~, it may provide information about it, including an explanation of how ~~GHG emission reduction ***targets*** are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement. This disclosure~~it is ~~applicable only if the undertaking has adopted such a transition plan.~~ contributing to reduce GHG emissions.

56. In case the undertaking operates in high climate impact sectors and does not have a transition plan for climate change mitigation in place, it shall indicate whether and, if so, when it will adopt such a transition plan.

~~Disclosure BP 5 – Physical~~C 4 – Climate risks ~~from climate change~~

57. If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall:

(a) briefly describe such climate-related hazards and climate-related transition events;

(b) disclose how it has assessed the exposure and sensitivity of its assets, activities and value chain to these hazards and transition events;

(c) disclose the time horizons of any climate-related hazards and transition events identified; and

(d) disclose whether it has undertaken climate change adaptation actions for any climate-related hazards and transition events.

~~36.~~ The undertaking ~~shall~~may disclose the ~~anticipated~~potential adverse effects of climate risks, that may affect its financial ~~effects that physical risks from climate change may have on the company. This disclosure is applicable only if the undertaking is exposed to material physical risks. In particular, it shall disclose:~~

~~(a) the monetary amount and the percentage of the undertaking's total assets that can be subjected to material physical risks over the~~ performance or business operations in the short-, medium~~- and long term before considering ***climate change adaptation actions*** disaggregated by acute and chronic physical risk;~~

~~(b)~~58. or long term, indicating whether it assesses the ~~proportion of assets at material physical~~ risks to be ~~addressed by the ***climate change adaptation actions***~~; high, medium, low.

~~(c) the location of the significant assets affected by material physical risks;~~

~~(d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short , medium and long term; and~~

~~(e) the breakdown of the undertaking's carrying value of its real estate assets by energy efficiency classes.~~

~~Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio~~

~~37.~~ ~~If the undertaking generates hazardous and/or radioactive waste, the undertaking shall disclose the total amount of ***hazardous waste*** and/or radioactive waste generated (radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom).~~

Comprehensive Module - Social Metrics

[6] High climate impact sectors are those listed in NACE Sections A to H and Section L as defined in Annex I to Regulation (EC) No 1893/2006.

Disclosure C 5 – Workforce (General) Additional characteristics

C5 – Additional (general) workforce characteristics

59. If the undertaking employs 50 or more ***employees***, it may disclose the female-to-male ratio at management level for the reporting period.

60. If the undertaking employs 50 or more ***employees***, it may disclose the number of those self-employed without personnel who are working exclusively for the undertaking, and temporary workers provided by undertakings primarily engaged in 'employment activities'.

C6 – Additional own workforce ~~metric~~information - Human rights policies and processes

61. The undertaking shall disclose an answer to the following questions.

(a) Does the undertaking have a code of conduct or human rights ***policy*** for its ***own workforce***? (YES/NO)

(b) If yes, does this cover:

i. child labour (YES/ NO);

ii. forced labour (YES/ NO);

iii. human trafficking (YES/NO);

iv. discrimination (YES/NO);

v. accident prevention (YES/NO); or

vi. other? (YES/NO – if yes, specify).

(c) Does the undertaking have a complaints-handling mechanism for its ***own workforce***? (YES/NO)

C7 – Severe negative human rights incidents

62. The undertaking shall disclose an answer to the following questions:

(a) Does the undertaking have confirmed incidents in its ***own workforce*** related to:

i. child labour (YES/ NO);

ii. forced labour (YES/ NO);

iii. human trafficking (YES/ NO);

iv. discrimination (YES/ NO); or

v. other? (YES/NO – if yes, specify).

(b) If yes, the undertaking may describe the ***actions*** being taken to address the ***incidents*** described above.

(c) Is the undertaking aware of any confirmed ***incidents*** involving ***workers in the value chain***, ***affected communities***, ***consumers*** and ***end-users***? If yes, specify.

Comprehensive Module – Governance Metrics

~~Disclosure BP~~C ~~1 8~~ – Revenues from certain sectors and exclusion from EU reference benchmarks

~~45.~~63. ~~The~~If the undertaking ~~shall include a statement indicating if it~~ is active in one or more of the following sectors ~~while disclosing~~it shall disclose its related revenues~~:~~ in the sector(s):

(a) controversial weapons ~~such as (~~anti-personnel mines, cluster munitions, chemical weapons and biological weapons~~; and/~~); ~~or~~

(b) the cultivation and production of tobacco; ~~and/or~~

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(c) fossil fuel (coal, oil and gas) sector (i.e.~~,~~ the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, ~~from~~ oil and ~~from~~ gas~~); and/~~; or

(d) chemicals production, ~~as its activities fall under Division 20.2~~if the undertaking is a manufacturer of ~~Annex I to Regulation (EC) No 1893/2006[7]~~pesticides and other agrochemical products.

64. The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement as described in paragraph 241 of the guidance.

~~Disclosure BP~~C 92 – Gender diversity ratio in the governance body

~~46.~~65. If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.

~~**Disclosure BP 7 – Alignment with internationally recognised instruments**~~

~~38. The undertaking shall disclose whether its policies pertaining to its ***own workforce*** are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.~~

~~**Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations**~~

~~39. The undertaking shall disclose whether it has processes in place to monitor compliance with the OECD Guidelines for Multinational Enterprises and with the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the International Bill of Human Rights and the eight fundamental conventions identified in the ILO Declaration or grievance/complaints handling mechanisms, to address violations of the above standards with regard to its ***own workforce***.~~

~~**Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the eight fundamental conventions of the ILO Declaration and the International Bill of Human Rights)**~~

~~47. The undertaking shall disclose whether there have been any violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises with regard to its ***own workforce*** during the reporting year.~~

~~**Disclosure BP 10 – Work-life balance**~~

~~48. Theundertaking shall disclose the percentage of its employees:~~

~~(a) who are entitled to take family related leave with a breakdown by gender; and~~

~~(b) who took family related leave with a breakdown by gender.~~

~~Family related leave includes maternity, paternity, parental and carers' leave.~~

~~**Disclosure BP 11 – Number of apprentices**~~

~~[7] "Manufacture of pesticides and other agrochemical products" listed in Division 20.2 of Annex I Regulation EC 1893/2006.~~

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~~49. If applicable, the undertaking shall disclose the number of apprentices in the reporting period.~~

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Basic Module: Guidance

66. The guidance below is intended as part of an ecosystem that will include also the development of further support guides ~~further implementation guidance~~ by EFRAG, further digital tools and implementation support (educational activities, stakeholders' engagement) that aim to facilitate the understanding of some of the technical elements in the guidance.

67. ~~This guidance is intended to support~~ This guidance supports undertakings that wish to apply ~~the preparation of the Metrics in~~ the Basic Module.

Basic Module Guidance – General information

~~50.~~

~~Metric~~ B1 – Basis for Preparation

68. When reporting on the legal form of the undertaking according to national legislation under paragraph 24(e)(i), the undertaking can choose from one of the following undertaking structures:

    (a) private limited liability undertaking

    (b) sole proprietorship

    (c) partnership

    (d) cooperative

    (e) other (please specify based on country specifications for legal forms).

69. When reporting on the NACE code(s) of the undertaking under paragraph 24(e)(ii), NACE codes (Nomenclature statistique des activités économiques dans la Communauté Européenne) are a classifications of economic activities used in the European Union. They provide a standardized framework for classifying economic activities into sectors, enabling comparability and a common understanding among the various EU countries.

70. The NACE code consists of a number of digits ranging from 2 to 5, depending on the level of specificity with which the economic activity is identified. The list of NACE codes can be found in the following document: REGULATION (EC) No 1893/2006.

Level Nr	Identifier	Description
1	Section	Sections are identified by an alphabetic letter, and they define 21 general economic areas, such as agriculture, manufacturing industry, or commerce.
2	Division	The division is identified by a two-digit numerical code and identifies a specific sector within the general economic area. There are a total of 88 divisions.
3	Group	The group is identified by a three-digit numerical code (also considering the division's two digits) and defines a specific area within the sector. There are about 270 groups.
4	Class	The class is identified by a four-digit numerical code (considering the digits of division and group) and defines a specific activity within the group. There are about 450 classes.

71. When reporting the number of employees under paragraph 24 (e)(v), full-time equivalent (FTE) is the number of full-time positions in an undertaking. It can be calculated by dividing an employee's scheduled hours (total effective hours worked in a week) by the employer's hours for a full-time

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workweek (total hours performed by full-time employees). For example, an employee who works 25 hours every week for a company where the full-time week is 40 hours represents a 0,625 FTE (i.e. 25/ 40 hours).

72. Headcount is the total number of people employed by the undertaking at a given time.

73. When reporting on the country of primary operations and the location of significant assets under paragraphs 24 (e)(vi) and (vii), the undertaking shall disclose this information for each of its ***sites*** using the table below:

Sites	Address	Postal Code	City	Country	Coordinates (geolocation)
Registered Office (e.g.)					
Warehouse (e.g.)					
Industrial Plant (e.g.)					

74. The geolocation of an undertaking is expected to be a valuable datapoint for stakeholders for the assessment of risks and opportunities connected to the SME, particularly in relation to the sustainability issues of climate change adaptation, water, ecosystems, and biodiversity.

75. The geolocation shall be provided in spatial points for single units, or polygon points defining the boundaries of a larger, less unit-like ***site***, such as a farm, mine or facility. The undertaking may also provide a cluster of points to allow for the easy identification of the concerned area. The spatial points shall be provided as coordinates, with five decimal places (e.g. 0° 00' 0.036").

76. When disclosing the geolocation of ***sites*** owned, leased, or managed, the undertaking shall include the coordinates of the sites in the table shown in paragraph 7~~5~~3. The undertaking may use web mapping tools (e.g. google maps, apple maps) to identify the coordinates of sites that it owns, leases, or manages. The undertaking may also use any appropriate software tools or platforms to further establish the perimeter or area of larger sites.

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77. In relation to paragraph 2~~5~~6, sustainability-related certification can include registered eco-labels from an EU, national or international labelling scheme, corresponding to the main activity of an SME. For instance, the EU Ecolabel covers specific products, such as textiles and footwear, coverings (e.g., wood floor coverings), cleaning and personal care products, electronic equipment, or furniture. The undertaking may consult the EU Ecolabel Product Groups and Product Catalogue for further information.

B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

78. Undertakings may use the following template to report on B2 datapoints.

	Do you have existing sustainability practices policies/ future initiatives that address	Are they publicly available? [YES/NO]	Do~~es~~ the policy~~ies~~ have any targets? [YES/NO]

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	any of the following sustainability issues? [YES/NO]		
Climate Change			
Pollution			
Water and Marine Resources			
Biodiversity and Ecosystems			
Circular Economy			
Own Workforce			
Workers in the Value Chain			
Affected Communities			
Consumers and end-users			
Business conduct			

79. If the undertaking is a cooperative, it may disclose:

(a) the effective participation of workers, users or other interested parties or communities in governance;
(b) the financial investment in the capital or assets of social economy entities referred to in the Council Recommendation of 29 September 2023 (excluding donations and contributions); and
(c) any limits to the distribution of profits connected to the mutualistic nature or to the nature of the activities consisting in services of general economic interest (SGEI).

Guidance for own workforce, workers in the value chain, affected communities and consumers and end/users

80. In order to understand the sustainability issues that relate to social and human rights, refer to Appendix B for a list of possible sustainability issues (for example, child labour for own workforce or workers in the value chain). This list could help identify if the policies, practices, or future initiatives are aimed at addressing negative human rights impacts in a comprehensive way or if they are limited to certain groups of affected stakeholders (for example, workers in the upstream value chain).

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Basic Module Guidance - Environmental Metrics

~~Metric~~ B 3 – Energy and greenhouse gas emissions

Impacts on climate: energy usage and greenhouse gas emissions

~~51.~~81. Under paragraphs ~~24~~29 and ~~25~~30, the undertaking reports on its climate impacts, providing information about its energy use and greenhouse gas emissions. This guidance for disclosure B 3 does not constitute an additional datapoint to the disclosures described in paragraphs ~~24~~29 (on energy consumption) and ~~25~~30 (on GHG emissions) but rather reinstates an overarching objective and provides context ~~of~~ for the Basic disclosure B-3.

Energy consumption

~~52.~~82. Climate related impacts are significantly driven by energy consumption. Therefore, it is relevant to disclose both the quantity as well as the type – e.g., fossil fuels such as coal, oil, and gas versus ***renewable energy*** – and mix of energy consumed. Examples of energy disclosures are total energy consumption broken down by fossil fuels and electricity. Other breakdowns may be reported such as consumption of purchased or self-generated electricity from renewable sources. ~~This~~ An example of the information ~~may be provided~~requested in ~~the following format~~paragraph 29 follows.~~:~~

	Renewable Energy Consumption (MWh)	Non-renewable Energy Consumption (MWh)	Total 202(x) Energy consumption (MWh)
Electricity (as reflected in utility billings)	300	186	486
Fuels	3	7	10
Total	303	193	496

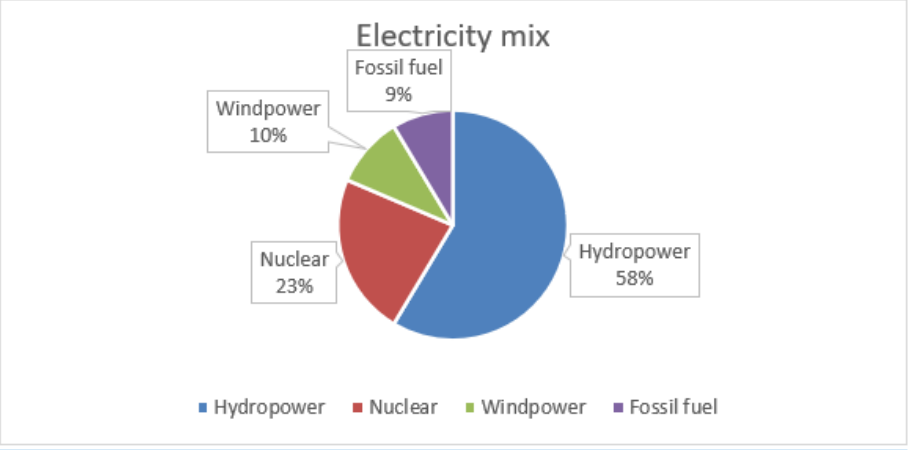
~~40. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt Hours (MWh) of electricity purchased from a utility, steam received from a nearby industrial plant or diesel purchased at petrol stations.~~

~~53.~~83. In case the undertaking purchases fossil fuels (e.g., natural gas, oil) or renewable fuels (e.g., biofuels, such as ~~natural gas, oil or biomass~~biodiesel and bioethanol) to generate electricity, heat or cooling for its own consumption, it has to avoid double counting. Therefore, the undertaking accounts for the energy content of the purchased fuel only as fuel consumption, but it does not account for, or report on, its electricity and heat consumption produced from that fuel yet again. In case of electricity generation from renewable energies such as solar or wind – and where no fuel use is~~n~~ necessary – the undertaking accounts for the amount of electricity generated and consumed as electricity consumption.

84. The undertaking shall not offset its energy consumption by its energy production even if on site generated energy is sold to and used by a third party. The undertaking shall also avoid double counting fuel consumption when disclosing self-generated energy consumption. If the undertaking generates electricity from either a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted only once under fuel consumption. The share of ***renewable energy*** consumption can be calculated based on guarantees of origin, renewable energy certificates or electricity composition as stated in the electricity bill. The electricity

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bill may refer to electricity units consumed and specify the percentage of electricity provided coming from renewable sources and it may look like the figure below.



85. When preparing the information on energy consumption required under paragraph 29, the undertaking shall exclude feedstocks and fuels that are not combusted for energy purposes. The undertaking that consumes fuel as feedstocks can disclose information on this consumption separately from the required disclosures.

Conversion between different energy units

86. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt-Hours (MWh) of electricity purchased from the utility steam received from a nearby industrial plant or diesel purchased at petrol stations. Electricity explicitly refers to heat, steam and cooling. Fuels include anything burned, e.g. gas, natural gas, biomass, etc.

87. Paragraph 29 indicates MWh as the unit of choice for measuring energy consumption. In case of fuel or biomass, a conversion to MWh is necessary for data expressed in other units such as energy content (e.g. kJ, Btu), volume (e.g. litres, m³) or mass (e.g. metric tonnes, short tonnes).

88. For fuel consumption measured by mass (e.g., wood, coal), the undertaking should:

(a) obtain the Net Calorific Value (e.g. kJ/metric ton, TJ/Gg) of the fuel (it can be a typical value published by reliable sources, e.g. IPCC, or may be provided by the supplier or attained internally);

(b) convert the Net Calorific Value to MWh/ton, for example:

1 TJ = 10^{12}~~,012~~ J = 277.78 MWh ; 1 Gg = 109 g = 1,000 t

11.9 TJ/Gg = 11.9 * 277.78/1000 t = 3.31 MWh/ton; and

(c) calculate the energy content of the mass, for example:

1,245,345 t * 3.31 MWh/ton = 4,117,111 MWh.

89. For liquid fuel, the undertakings should:

(d) convert volume information to mass, multiplying volume by fuel density, for example,

Diesel = 4,456,000 l; Diesel density = 0.84 kg/l

4,456,000 (l) * 0.84 (kg/l) = 3,743,040 kg = 3,743 t;

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(e) calculate the energy content, multiplying mass by Net Calorific Value, for example,

3,743 [t] * 43 [TJ/Gg] = 3,743 t * 43 TJ/(1,000 [t]) = 160.95 [TJ] ; and

(f) convert TJ to MWh, for example,

1 TJ = 10^{12}~~,012~~ J = 277.778 MWh

160.95 [TJ] = 277.78 [MWh/TJ] * 160.95 [TJ] = 44,708 MWh.

Documentation Source:	
Data	*Documentation Source*
CDP	CDP Technical Note: Conversion of fuel data to MWh https://cdn.cdp.net/cdp-production/cms/guidance_docs/pdfs/000/000/477/original/CDP-Conversion-of-fuel-data-to-MWh.pdf?1479755175

Greenhouse gas emissions

~~54.~~90. As for gross greenhouse gas emissions (GHG) arising from the undertaking's activities, ~~this~~the requirement in paragraph 30 builds on the definitions and rules of the GHG Protocol, the leading accounting standard for GHG emissions. Under paragraph ~~25~~30, undertakings are to report on their Scope 1 and Scope 2 emissions. Scope 1 GHG emissions cover direct emissions from owned or controlled sources. Scope 2 emissions are ***indirect GHG emissions*** resulting from the activities of the reporting company (as they derive from the undertaking's consumed energy) which, however, occur at sources owned or controlled by another company. Further guidance is provided in the sections below on how to calculate Scope 1 and 2 emissions.

~~55.~~91. Scope 1 and 2 emissions may be reported in the following format.

	202(x) GHG emissions (tCO_2e)
Scope 1	45
Scope 2	6
Total	51

~~**Scope 1 emissions calculation guidance**~~

92. The GHG Protocol is a global standard for measuring, reporting and managing GHG emissions while ensuring consistency and transparency. The corporate standard covers Scope 1, Scope 2 and Scope 3 emissions guidance for companies and other organisations (NGOs, government, etc.).

93. To ensure a fair account of the undertaking's emissions, the GHG Protocol has set a list of reporting principles:

(a) relevance: ensuring that the GHG inventory reflects the GHG emissions of the organisation.

(b) completeness: ensuring that the GHG inventory account for all the GHG emission sources and activities within the chosen boundary.

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(c) consistency: ensuring the consistency of the methodology used to allow for comparisons over time.

(d) transparency: disclosing the assumptions, references and methodology used when computing GHG emissions.

(e) accuracy: ensuring that GHG emissions data is sufficiently precise to allow users to make decisions.

94. In alternative to the GHG Protocol, undertakings may resort to ISO 14064-1, should it be better suited to their reporting needs.

95. When reporting on GHG emissions, it is important to set the appropriate boundaries to ensure that the GHG inventory is correct and to avoid double counting emissions. The GHG Protocol defines two main types of boundaries – organisational or operational boundaries.

(a) Organisational boundary: the GHG Protocol defines it as the boundaries that determine the operations owned or controlled by the reporting undertaking, depending on the consolidation approach taken. There are two approaches to consolidation of emissions – the equity or control approach. The undertaking will choose the approach that reflects its circumstances.

(b) The equity share approach relates to accounting for GHG emissions from operations according to its shares of equity in the operation.

(c) When using the control approach, the undertaking accounts for GHG emissions from operations over which it has either financial or operational control. Companies will use either the operational control or financial control criteria when using this approach to consolidate and capture its emissions in the report.

i. Financial control means that the undertaking has financial control over the operation if the former has the ability to direct the financial and operating policies of the latter with a view to gaining economic benefits from its activities.

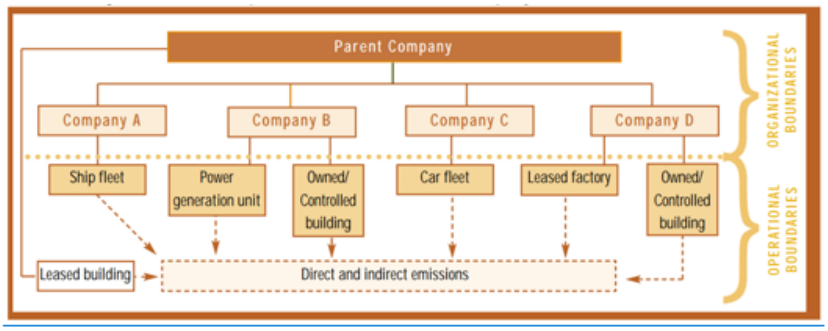
ii. Operational control means that an undertaking has operational control over an operation if the former or one of its subsidiaries has full authority to introduce and implement its operating policies at the operation.

(d) Operational boundary: the GHG Protocol defines it as the boundaries that determine the direct and indirect emissions associated with operations owned or controlled by the reporting company. This assessment offers an undertaking the ability to establish which operations and sources cause direct (Scope 1) and indirect emissions (Scope 2 and Scope 3), and to decide which indirect emissions to include that resulting from its operations.

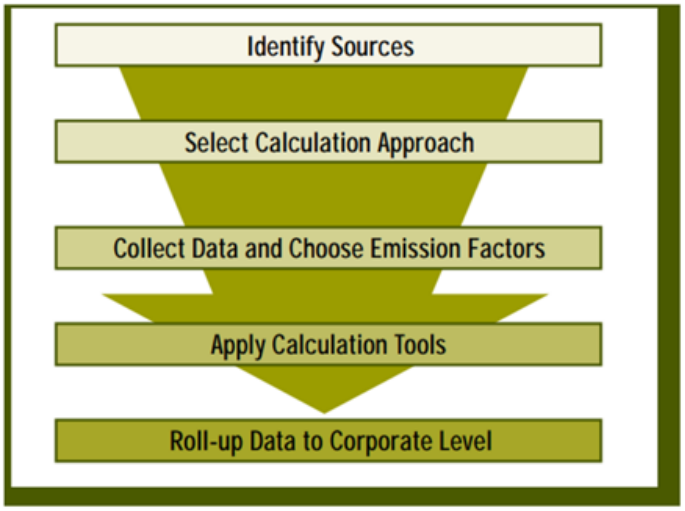
(e) Boundary considerations need to follow the principles detailed above (consistency over time, transparency in documenting them and completeness) and are visualised in the image below[8].

[8] Greenhouse Gas Protocol Corporate Standard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

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96. The GHG Protocol also introduces guidance as well as steps to follow to identify, calculate and track GHG emissions, as visualised in the image below[9].



97. Different tools have been developed by private and public initiatives to help undertakings in developing their GHG emissions inventory and facilitating challenges related to its preparation:

(a) calculation tools and guidance by the GHG Protocol: https://ghgprotocol.org/calculation-tools-and-guidance

(b) SME Climate hub: https://smeclimatehub.org/start-measuring/

(c) Business Carbon Calculator by Normative: https://businesscarboncalculator.normative.io/en/

(d) Carbon Trust SME Carbon Footprint Calculator: https://www.carbontrust.com/our-work-and-impact/guides-reports-and-tools/sme-carbon-footprint-calculator

(e) UK Business Climate hub: https://businessclimatehub.uk/carbon-footprint-calculators/

Scope 1 and location-based Scope 2 emissions guidance

~~56.~~ 98. Typical Scope 1 emissions include CO2 (as well as CH_4 and N_2O) emissions associated with fuel combustion (for example~~,~~ in boilers, furnaces, vehicles, etc.) and fugitive emissions from air conditioning and industrial processes.

99. Location-based Scope 2 includes emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company. It reflects the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines,

[9] Greenhouse Gas Protocol Corporate Standard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).

41. Emissions associated with combustion can be calculated by the expression

$$Emissions_{GHG,Fuel} = Activity\ Data_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

where the value assigned to '$Emissions_{GHG}$' corresponds to the emissions of CO2, CH4 or N2O resulting from the combustion of the Fuel in tCO2e.

100. '$Activity\ Data_{Fuel}$' Evaluating GHG emissions can be done in several ways, including by the calculation approach, measurement, or a combination of measurement and calculations. One common approach is based on calculating with use of emission factors (EF) – which may incorporate the global warming potential (GWP) of the GHG. Direct measurement using sensors (flow and concentration) can also be applied. The table below summarises the most common methods.

GHG evaluation method	**Details**	**Necessary data**
Measuring	Multiplying the quantities of gas directly measured by their respective global warming potential.	Direct quantity of gas emitted obtained from gas measurement (flow, concentration, volume) Global warming potential (GWP) of the gases
Calculating	Multiplying the activity data by the emission factor (EF) that integrates the global warming potential (GWP)	Activity data Emission factors (EF)

101. The table above introduces the following terms:

activity data, which typically corresponds to the quantity of fuel consumed. Though typically It may be expressed in energy units, it can also be expressed in (e.g. MWh), volume (e.g. m³ or l) or mass (e.g. tonnes or kg.).

'$EF_{GHG,Fuel}$' corresponds to the specific combustion Emission Factor (EF) used for the fuel. The units of the EF need to be consistent with the units of the activity data.

a. 'GWP_{GHG}' corresponds to the Global Warming Potential of the GHG (CO2, CH4 or N2O). The activity data These can be determined using accessed by the undertaking by reviewing fuel purchase receipts and purchase records, or through direct measurement at the combustion device. The fuel quantities can be measured in different forms (typically mass or volume), and care needs to be taken to make sure that the activity data and the EF are expressed using the same units. It is not uncommon for emission factors of fuels to be expressed in terms of energy (Lower Calorific Value), in which case the further step of converting the volume or mass of the fuel to its energy content is needed (see the example below). This way, the expression above can take different forms, namelyutility bills.

$$Emissions_{GHG,Fuel} = Activity\ Data_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

$$Emissions_{GHG,Fuel} = [Volume * CalorificValue]_{Fuel} * EF_{GHG,Fuel} * GWP_{GHG}$$

b. CO2 global warming potential, which quantifies the impact of the given GHG on the climate compared to an equivalent unit of carbon dioxide; and

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57.c. emission factors are either derived through analysis of the carbon and heat content of the fuel (not likely to be needed for SME undertakings) or through the use(FE), quantifying how much GHG is emitted per unit of published activity. The emission factors for the most common fuels. EFs for CH4 and N2O will depend on the type of combustion technology and will vary with it. In most cases, CH4 and N2O emissions are within the measurement error of CO2 and can be neglected. Sometimes the emission factor can alreadyfrequently take into account the GWP of the GHG. In that, in which case the parameter GWP_{GHG}undertaking does not need to be consideredconsider the latter.

42. For the GWP, use the most recent values published by the Intergovernmental Panel on Climate Change (IPCC) based on a 100 year time horizon to calculate tCO2eq emissions of non CO2 gases. The current list features the IPCC's 6th Assessment Report, Chapter 7SM[10].

58.102. The following table provides a list of below summarises non-exhaustive sources ofwhere both emission factors for fuels(FE) and global warming potential (GWP) can be easily accessed by undertakings. Undertakings may also refer to authoritative national sources that may be more relevant to the particulars of their circumstancessituation.

Documentation Sources:	
Data	*Documentation Source*
Activity data	fuel purchase receipts, purchase records, or through direct measurement at the combustion device.
Emissions Factors (EF):	
Fuel	ADEME – Bilan Carbonne *https://base-empreinte.ademe.fr/* IPCC – Emissions Factor Database *https://www.ipcc-nggip.iges.or.jp/EFDB/find_ef.php?reset=* IPCC – Guidelines for National Greenhouse Gas Inventories *Microsoft Word V2_Ch2_Stationary_Combustion_Final.doc (iges.or.jp)*
Global Warming Potential (GWP)	IPCC – Global Warming Potential p. 16 *https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07_SM.pdf*

Emission factors (FE)	ADEME – Base Empreinte® IPCC – Emissions Factor Database IPCC – Guidelines for National Greenhouse Gas Inventories Association of Issuing Bodies (AIB) – Residual Mix Grid Emission Factors JRC – Historical GHG emissions factor for electricity consumption Life-cycle electricity production emission factors

[10] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, and M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Available on https://www.ipcc.ch/.

	USEPA GHG emission factors Hub Emission Factors and reference values published by the Government of Canada IEA's Annual GHG emission factors for World countries from electricity and heat generation (2022 data set, paid data set)
Global warming potential (GWP)	IPCC – Global Warming Potential

103. The undertakings can also find more guidance and tools on how to act and report on their GHG emissions and climate impacts by visiting ~~https://smeclimatehub.org/~~ https://smeclimatehub.org/.

Example of Scope 1 emission calculation

~~59.~~ 104. Company A burns Nr. 4 fuel oil in an industrial boiler. For its financial accounting, it keeps track of its costs, and for GHG accounting purposes, it keeps track of volumes (m^3) as reflected in their fuel receipts. From the receipts, it determines the annual volumes of fuel oil bought, and it keeps track as well of the fuel oil inventory on the first calendar day of the year. In 2023 it purchased 100 m^3 of fuel oil. Based on its records, on 1 January 2023 it had 2.5 m^3 in its reservoirs, and on 1 January 2024 it had 1 m^3. Thus, it determines (through purchase and measurement of inventory) that during 2023 it consumed 101.5 m^3 of fuel oil.

105. Using the IPCC list of emissions factors (Table 2.3, page 2.18), it estimates its emission factor to be a fifty-fifty blend of diesel oil and residual oil as 75.75 t CO2/TJ and by using published statistics on energy, determine~~d~~s that its net calorific value of the fuel is 0.03921 TJ/m^3. Given that the CO_2 GWP equals one, its CO_2 emission for this specific Scope 1 source is:

$$101.5\ m^3 * 0.03921\ TJ/m^3 * 75.75\ t\ CO_2/TJ * 1 = 301.5\ t\ CO_2$$

106. For the purpose of completeness ~~in of~~ this example, the CH_4 and N_2O emissions are also calculated. Checking the IPCC list of emission factors shows that, these are, respectively, 3 kg of CH_4/TJ and 0.6 kg of N_2O/TJ, ~~thus~~ the emissions thus being~~will be~~:

$$CH_4\ \text{emissions} = 101.5\ m^3 * 0.03921\ TJ/m^3 * 3\ kg\ CO_2/TJ * 29.8 = 0.36\ tCO_2e$$

$$N_2O\ \text{emissions} = 101.5\ m^3 * 0.03921\ TJ/m^3 * 0.6\ kg\ CO_2/TJ * 273 = 0.65\ tCO_2e$$

As mentioned, CH4 and N2O emissions add around 1 tCO2e to the CO2 value of 301.5 tCO2, which amounts to about 0.3% of the total. This could be considered well within an acceptable reporting error and so could not have been calculated and reported.

107. Global Warming Potentials for CH_4 and N_2O are derived from the IPCC's Sixth6th Assessment Report, Chapter 7SM[11].

~~**Guidance for location-based**~~ *Example of Scope 2* ~~**emissions**~~*emission calculation*

[11] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, and M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekci, R. Yu, and B. Zhou (eds.)]. Available from https://www.ipcc.ch/.

~~43. Location based Scope 2 includes emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company. It reflects the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid average emission factor data.~~

~~60. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).~~

~~44. Emissions associated with the purchase and consumption of electricity, heat, steam and cooling can be calculated by the expression~~

$$Emissions_{GHG} = Activity\ Data * EF$$

~~where '$Emissions_{GHG}$' corresponds to the emissions of GHG resulting from the production of electricity, heat, steam or cooling (in the case of combustion of fuels, typically CO_2, CH_4 and N_2O). '$Activity\ Data$' corresponds to the quantity of fuel consumed, typically expressed in energy units (e.g., MWh). And '$EF_{GHG,Energy}$' corresponds to the EF used for the production of energy (electricity, heat, steam or cooling). The emission factors can be grid average factors. The units of the EF need to be consistent with the units of the activity data.~~

~~45. A grid average emission factor is an emission factor that characterises all the GHG emissions associated with the quantity of electricity generation produced by facilities located within a specified geographic boundary. These emission factors are usually produced for periods of one year – by averaging emissions and electricity production over a calendar year – and are often produced by the Electricity System Operator (ESO), Transmission System Operators (TSO), the electricity system supervisory body or other competent authorities. There are also grid average emission factors calculated for much shorter periods, e.g., for seconds or minutes.~~

~~46. Undertakings may also want to provide their market based Scope 2 figure. Emission factors for market based Scope 2 emissions reflect the contractual arrangements of the undertaking with its energy suppliers. Market based emission factors can be provided by their electricity or heat suppliers as well as supported by their own purchase of Energy Attribute Certificates or Power Purchase Agreements (PPAs) or the use of residual mix emission factors.~~

~~47. Scope 2 accounting methods are explained in more detail in the GHG Protocol Scope 2 Guidance.~~

~~*Example*~~

~~61.~~108. Company A occupies an office building of 2000 m² in Paris, where it pays the electricity consumed for the central heating and cooling, lighting, computers and other electric equipment such as appliances. With its utility bills, it has estimated that the building consumed 282 MWh of electricity in 2022. By using the emission factor provided by nowtricity.com for France in 2022, it has estimated its Scope 2 emissions for its building electricity consumption to be

$$Emissions_{GHG} = 282\,000\ [kWh] * 73\left[\frac{g\ CO_2eq}{kWh}\right] = 20.6\ \text{t}\ CO2_2eq$$

~~48. The following table provides a list of non-exhaustive sources of electricity emission factors. Undertakings may also refer to authoritative national or grid sources that may be more relevant to the particulars of their situation.~~

~~Documentation Sources:~~

~~*Data*~~	~~*Documentation Source*~~

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Activity data	Purchase receipts or utility bills, contract purchase or firm purchase records
Emissions Factors (EF):	
Europe Grid electricity	Association of Issuing Bodies (AIB) – Residual Mix Grid Emission Factors *https://www.aib-net.org/facts/european-residual-mix* ADEME – Bilant Carbonne *https://base-empreinte.ademe.fr/* JRC – Historical GHG emissions factor for electricity consumption *https://data.jrc.ec.europa.eu/dataset/919df040-0252-4e4e-ad82-c054896e1641#dataaccess* *Life cycle electricity production emission factors https://www.nowtricity.com/*
North America Grid electricity	USEPA GHG emission factors Hub https://www.epa.gov/climateleadership/ghg-emission-factors-hub Government of Canada https://publications.gc.ca/collections/collection_2023/eccc/En84-294-2023-eng.pdf
Other regions/Global	IEA's Annual GHG emission factors for World countries from electricity and heat generation (2022 data set, paid data set) *https://www.iea.org/data-and-statistics/data-product/emissions-factors-2022#emissions-factors*
Global Warming Potential (GWP)	IPCC – Global Warming Potential (GWP-100) p. 16 *https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07_SM.pdf*

49. More guidance and tools on how to act and report on climate can be found at https://smeclimatehub.org/.

109. Undertakings may also want to provide their market-based Scope 2 figures. Emission factors for market-based Scope 2 emissions reflect the contractual arrangements of the undertaking with its energy suppliers. Market-based emission factors can be provided by their electricity or heat suppliers as well as supported by their own purchase of Energy Attribute Certificates or Power Purchase Agreements (PPAs) or the use of residual-mix emission factors.

Conversion between different energy units

50. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt Hours (MWh) of electricity purchased from the utility steam received from a nearby industrial plant or diesel purchased at petrol stations.

62. Paragraph 24 indicates MWh as the unit of choice for measuring energy consumption. In case of fuel or biomass, a conversion to MWh is necessary for data expressed in other units such as energy content (e.g., kJ, Btu), volume (e.g., litres, m³) or mass (e.g., metric tonnes, short tonnes).

63. For fuel consumption measured by mass (e.g., wood, coal), the undertaking should

(a) obtain the Net Calorific Value (e.g., kJ/metric ton, TJ/Gg) of the fuel (it can be a typical value published by reliable sources, e.g., IPCC, or may be provided by the supplier or attained internally);

(b) convert the Net Calorific Value to MWh/ton, for example,

1 TJ = 1,012 J = 277.78 MWh ; 1 Gg = 10^9 g = 1,000 t

11.9 TJ/Gg = 11.9 * 277.78/1000 t = 3.31 MWh/ton; and

(c) calculate the energy content of the mass, for example,

1,245,345 t * 3.31 MWh/ton = 4,117,111 MWh.

64. For liquid fuel, the undertakings should:

(a) convert volume information to mass, multiplying volume by fuel density, for example,

Diesel = 4,456,000 l; Diesel density = 0.84 kg/l

4,456,000 (l) * 0.84 (kg/l) = 3,743,040 kg = 3,743 t;

(b) calculate the energy content, multiplying mass by Net Calorific Value, for example,

3,743 [t] * 43 [TJ/Gg] = 3,743 t * 43 TJ/(1,000 [t]) = 160.95 [TJ] ; and

c) convert TJ to MWh, for example,

1 TJ = 1,012 J = 277.778 MWh

160.95 [TJ] = 277.78 [MWh/TJ] * 160.95 [TJ] = 44,708 MWh.

Documentation Source:	
Data	*Documentation Source*
CDP	CDP Technical Note: Conversion of fuel data to MWh https://cdn.cdp.net/cdp-production/cms/guidance_docs/pdfs/000/000/477/original/CDP-Conversion-of-fuel-data-to-MWh.pdf?1479755175

Metric B 4 – Pollution of air, water and soil

Guidance on which undertakings need to report on pollution and what pollutants do undertakings need to report on

65. 110. Paragraph 2632 establishes that, if applicable, the undertaking shall disclose the pollutants it emits to air, water and soil in its own operations if such information is already required to be reported by law to competent authorities or under an Environmental Management System such as EMAS. This means that the undertaking will, first, assess whether it already reports such information,

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either as a legal requirement or voluntarily. If it already reports information on pollutants emissions (or is legally required to do so), the undertaking will then provide further information on such emissions, according to the requirements in paragraph 32. However, if the undertaking does not yet report such information (and is not legally required to do so), it is simply required to state this to be the case.

~~66.~~111. ~~The metrics to be disclosed under this paragraph refer to information that the undertaking is already mandated to provide by law. This requirement was conceived to avoid any additional reporting burden on undertakings~~. In general, this requirement is expected to apply to undertakings that are operators of an industrial installation ~~covered by the Industrial Emissions Directive (IED). The IED applies to some 52~~or intensive livestock farm covered by the Industrial and Livestock Rearing Emissions Directive (IED 2.0), amending the Industrial Emissions Directive (IED). The IED 2.0 applies to some 75,000 installations in Europe, covering activities such as burning fuel in boilers with rated power of more than 50 MW, founding in metal foundries, processing of non-ferrous metals, production of lime, manufacturing of ceramic products by firing, production of plant protection products or biocides, rearing of any mix of pigs or poultry representing 380 livestock units or more, tanning of hides, slaughterhouses, etc. In these cases, the installation must already ~~has to~~ report to the competent authority the pollutants released to air, water and soil, and the data is publicly available at the ~~European Pollutant Release and Transfer Register (E-PRTR).~~ Industrial Emissions Portal Regulation (IEPR), replacing the European Pollutant Release and Transfer Register (E-PRTR). Companies that operate in more than one facility do not have to report on their consolidated company-wide emissions under the EPRTR, as they report only at facility level. This [draft] Standard requires the reporting of the total amount of pollutants of all the facilities. Similarly, companies owning but not operating in a facility do not have to report to the E-PRTR but are expected to reflect their facility-owned emissions in their sustainability report.

~~67.~~112. Likewise, if ~~under an EMAS certification~~ an undertaking has been identified as having to monitor and report on the pollutants listed in the E-PRTR under an Environmental Management System such as, for example, an Eco-Management and Audit Scheme (EMAS) or ISO 14001 certification;. Tthese are in principle relevant aspects for the undertaking to include in its sustainability report.

~~68.~~113. If an undertaking has only one facility or operates in only one facility, and if its pollution data is already publicly available, the undertaking may refer to the document where such information is provided instead of reporting it once again. Likewise, if the undertaking publishes an organisation-wide report, such as, for example, an EMAS report, that incorporates pollution data, it can include it in the sustainability report by reference.

~~69.~~114. To report information on pollutants in the sustainability report, the undertaking should indicate the type of pollutant material being reported alongside the amount emitted to air, water and soil in a suitable mass unit (e.g., t or kg).

~~70.~~115. Below can be found an example of how undertakings may present information on their emissions to air, water and soil divided by pollutant type.

Pollutant	**Emissions (kg)**	**Medium of release (air, water, soil)**
e.g., Cadmium and compounds	10	Water
Type of pollutant 2		
Type of pollutant 3		

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116. As for the types of pollutants that need to be considered when reporting under paragraph 32, the undertaking may refer to the following main pollutants that are currently covered under EU law. Nevertheless, each undertaking shall consider the specific pollutants covered by the legislation in their respective jurisdictions.

117. Examples of key pollutants to air (Dir. 2024/299; Reg. 2024/1244; EC, 2024; EEA, 2022): sulphur oxides (Sox/SO2 – e.g. from energy generation and heating in manufacturing), nitrogen oxides (NOx/NO2 – e.g. from transport), non-methane volatile organic compounds (NMVOC – e.g. from agricultural activities), carbon monoxide (CO – e.g. from fossil fuel combustion), ammonia (NH3 – e.g. manure application and storage), particulate matter (PM10 – e.g. from combustion in manufacturing, transport, agricultural activities), heavy metals (Cd, Hg, Pb, As, Cr, Cu, Ni, Zn), POPs (total PAHs, HCB, PCBs, dioxins/furans), ozone-depleting substances or 'ODS' (chlorofluorocarbons 'CFCs', hydrochlorofluorocarbons 'HCFCs', halons), black carbon (BC – e.g., from energy consumption), etc.

118. According to the Guide for Business on air pollutants emissions adopted by the Alliance for Clean Air, the major sources of emissions of air pollutants in the private sector (that are also highly impactful for the entire value chain) include: (a) electricity generation from fossil fuel or biomass combustion (which may be done externally, distributed through a national grid, then consumed along the value chain activities); (b) direct stationary fossil fuel or biomass combustion within an undertaking's activities or industrial processes, or the operation of stationary machinery or other activities that require fuel combustion; (c) transport (freight, road, rail, shipping and aviation, off-road vehicles such as those used in agriculture or construction); (d) industrial processes (all other emissions that do not stem from fuel combustion and that occur during industrial processes); (e) agriculture (livestock and manure management, crop production such as crop residue burning, manure and fertiliser application); (f) waste disposal (e.g., landfilling, incineration or open burning, or composting).

119. The Guide represents an example of a simple methodology for developing a company's air pollutant emission inventory and calculating the emissions of respective air pollutants. This methodology is divided into the following steps; excluding the mapping of the value chain as under the VSME Standard the information required by this Disclosure Requirement is to be reported at the level of the reporting company: (1) identifying emission sources within the value chain, (2) identifying methodologies for quantifying emissions, (3) collecting activity data, (4) identifying emissions factors, and (5) quantifying emissions. The guide provides a mapping of sources of pollution to methodologies for calculating information on emissions stemming from the main air pollutants (table below).

Sources of pollution	**Methodology for quantifying emissions** **(Section in the guidance)**
Electricity	Section 4.1
Fuel combustion	Section 4.2
Transport	Section 4.3
Industrial processes	Section 4.4
Agriculture	Section 4.5

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Waste	Section 4,6

120. Below is an example of a calculation method for air pollutant emissions using the method for manufacturing taken from the Guide above. In the example considered, Mp is the quantity of material M used in (or produced by) a company's value chain produced using process p (tonnes, litres); EFk,p is the emission factor for pollutant k for process p (g unit production-1); Emk,p are emissions of the specific pollutant k for process p (g).

$$Em_{k,p} = M_p * EF_{k,p}$$

121. For instance, a medium-sized chocolate manufacturer producing 1.750 tonnes of chocolate in 2022 would apply the default emission factor of 2 to calculate its emissions of NMVOCs, which would result in the following calculation:

1.750 tonnes of chocolate * 2 (emission factor of NMVOCs) = 3.500 tonnes of emissions of NMVOCs.

122. Transport may be another significant source of air pollution within own operations and at value chain level. In this case, to estimate the emission of a particular pollutant from road transport, for example, the entity will need to use the following formula, where: FCv,f is the fuel consumption of vehicle type v using fuel f (kg); EFk,v,f is the emission factor for pollutant k for vehicle type v, and fuel f (g vehicle-km-1); Emk,v,f represents the emissions of the specific pollutant k for vehicle type v, and fuel f (g).

$$Em_{k,v,f} = FC_{v,f} * EF_{k,v,f}$$

123. For example, a light commercial vehicle (LCV) running on diesel that travelled a total of 2.800 km in 2022, produced the following amount of PM10 emissions (PM10 emission factor of 1,52 g/kg):

2.800 km * 1,52 = 4.256 grammes of emissions of PM_{10}.

124. Fuel combustion is an additional critical source of air emissions. In this case an example of formula may be the following, where FCn is the fuel n consumed within the source category (Gj); EFk is the emission factor for this pollutant k (g/Gj); and Emk are emissions of the specific pollutant k (g).

$$Em_k = FC_n * EF_k$$

125. For example, a company consuming 3.000.000 grammes of fuel in 2020 will have an EF of 0,67 for SO2, resulting in:

3.000.000 * 0,67 = 2.010.000 grammes of emissions of SO_2. from fuel combustion in 2020.

126. Examples of key pollutants to water (Reg. 2024/1244; Dir. 2000/60/EC; Dir. 2006/118/EC; Dir. 91/676/EEC; Dir. 2010/75/EU; and amendment Dir. 2024/1785; EEA, 2024) are: nitrogen (N), phosphorus (P), heavy metals (Cd, Hg, Pb, as well as As, Cr, Cu, Ni, Zn), POPs and pesticides, BTEX (benzene, toluene, ethylbenzene, xylenes) and other Volatile Organic Compounds (VOCs), substances unfavourably influencing the oxygen balance (measured using parameters such as BOD, COD, etc.), total organic carbon (TOC), etc.

127. Pesticides and nutrients (e.g., N and P) may be released through agricultural activities (EEA, 2023; UNEP, 2023) (e.g., manure or inorganic fertiliser application). Heavy metal concentrations may stem from mining and wastewater discharges. TOC is a generic indicator of water contamination with organic matter which indicates the presence of living material, for example in wastewater, but also surface and groundwater (usual concentration levels of less than 10 mgl^{-1} and 2 mgl^{-1} respectively). COD widely indicates the presence of industrial effluents or sewage, with values that are typically lower than 20 mgl^{-1} in unpolluted waters and industrial wastewaters reaching values of up to 60.000 mgl^{-1}. BOD is normally used to determine pollution by organic matter in surface waters as well as for the efficiency of sewage treatment and it usually features values around 2 mgl^{-1} in unpolluted waters and 10 mgl^{-1} and more in polluted waters. The release of VOCs can be the result of spills to water.

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128. As for the methodology used to measure emissions to water, the EEA recommends a simple estimation technique, similar to the one used for the afore-mentioned air pollutants. In the formula below, ARa is the activity rate for activity a (to be chosen based on the specific activity or process; e.g. see Mp in the air emissions calculation above); EFp,a is the emission factor for pollutant p for activity a; and Emissionsp,a are emissions of the specific pollutant p for activity a.

$$Emissions_{p,a} = AR_a * EF_{p,a}$$

129. Examples of key pollutants emitted to soil (Reg. 2024/1244; Dir. 86/278/EEC) are: N, P, heavy metals (e.g., land application of sewage sludge), BTEX and other VOCs, POPs and pesticides.

130. Overall, the private sector sources of soil pollution are mainly the products or by-products of industrial processes (e.g., production of chemicals, energy, textiles manufacturing), accidental spills of petrol-derived products, livestock and agricultural activities (e.g., irrigation with untreated wastewater, poultry rearing), production and treatment of wastewater, production and processing of metals and minerals, and transportation (FAO, 2021).

131. Several national manuals have been developed to support companies in the calculation of their emissions to air, water and soil, For example, in Australia and South Africa entities are presented with a few estimation options to choose from, depending on their possibilities: direct measurement (e.g., sampling, continuous monitoring system), mass balance, engineering calculations, emission factors (same formula as above for air and water emissions), etc. The general approach to calculating such emissions is to: 1) identify the emission sources within the facility (combustion, manufacturing, solvent evaporation, storage, fugitive); 2) make a stock of the information available; 3) identify in the list of estimation methods the most suitable one for the specific process under evaluation, the information available, and the measuring tools that can be acquired to get the data that is needed; 4) gather the data required for each method; and 5) calculate emissions. The manuals provide several formulas and examples for each emissions calculation method.

132. A list of emission factors for air pollutants can be found at the dedicated webpage of the EEA. Although emission factors are more commonly used for air pollution, certain ones for surface water discharge and land disposal for specific processes were made available by the WHO. Additional emission factors for POPs may be consulted here.

133. It is to be noted that the requirements under paragraph 342 are only applicable to SMEs operating in specific sectors. Undertakings that are involved in the provision of services (e.g., operating in co-working or shared facilities, or remotely), for instance, are typically not included in the scope of this disclosure. By contrast undertakings carrying out production activities (e.g., chemicals) generally have impacts in terms of pollution and are, therefore, expected to report under this disclosure. The table below (adapted from the EMAS User Guide) provides examples of sectoral impacts, including for office services, for which pollution-related aspects may not be significant.

Activity	Environmental aspect	Environmental impact
Transport	- consumed machine oils, fuel consumption - vehicle emissions - tyre abrasion (fine dust)	- **soil, water, air pollution** - greenhouse effect, noise
Construction	- primary raw material (resource) consumption - air emissions, noise, vibrations, etc. From construction machinery - land consumption	- raw material availability - noise, **soil, water, air pollution** - destruction of ground cover - biodiversity loss

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Office services	- consumption of materials, (e.g., paper, toner) - electricity consumption (leads to indirect CO2 emissions)	- generation of mixed municipal waste - greenhouse effect
Chemical industry	- primary raw material (resource) consumption - wastewater - emissions of volatile organic compounds - emissions of ozone-depleting substances	- raw material availability - **water pollution** - photochemical ozone - **destruction of the ozone layer**

Documentation Sources:

Data	*Documentation Source*
EMAS User Guide	https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_part1_0.pdf
A Practical Guide For Business: Air Pollutant Emission Assessment	https://www.ccacoalition.org/sites/default/files/resources/files/CCAC%20SEI%20-%20A%20Practical%20%20Guide%20For%20Business%20-%20Updated_Final%202023.pdf
Regulation (EU) 2024/1244 (IEPR)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401244
Directive 2010/75/EU (IED) & amendment in Directive (EU) 2024/1785 (IED 2.0)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20110106 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202401785#d1e40-42-1
Calculating emissions to water – a simplified method	https://www.eionet.europa.eu/etcs/etc-icm/products/etc-icm-reports/calculating-emissions-to-water-a-simplified-method
Emission Estimation Technique Manual (Australia)	https://www.dcceew.gov.au/sites/default/files/documents/softdrink.pdf
A guide to reporting and estimating emissions for the integrated pollutant and waste information system	https://sawic.environment.gov.za/documents/297.pdf
EMEP/EEA air pollutant emission inventory guidebook 2023	https://efdb.apps.eea.europa.eu/?source=%7B%22query%22%3A%7B%22match_all%22%3A%7B%7D%7D%2C%22display_type%22%3A%22tabular%22%7D
Summary of techniques for estimating releases of chemicals from products (OECD)	https://www.oecd.org/content/dam/oecd/en/publications/reports/2017/01/resource-compendium-of-prtr-release-estimation-techniques-part-4-summary-of-

techniques-for-estimating-releases-of-chemicals-from-products_a3b37c3f/29018220-en.pdf

~~Metric~~ B 5 – Biodiversity

Guidance on how to identify sites in or near biodiversity sensitive areas

~~71.~~134. Paragraph ~~2833~~ stipulates that the undertaking shall disclose the sites it operates in that are located in or near ***biodiversity- sensitive areas***. Biodiversity sensitive areas are defined as such by special nature protection regulation at European or international level. These comprise areas belonging to the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs') as well as other protected areas ~~as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/21398.~~ designated as requiring special protection by governmental authorities (e.g. forest- protected areas or areas lying within river basin districts).

135. To identify protected areas and biodiversity sensitive areas, the undertaking may refer to databases such as the World Database on Protected Areas (WDPA) (a global database to help identify marine and terrestrial protected areas), the World Database on Key Biodiversity Areas, and the IUCN Red List of Threatened Species. The undertaking may also use tools, such as the Integrated Biodiversity Assessment Tool (IBAT).

136. Near, in the context of B5 – Biodiversity, shall refer to an area that is (partially) overlapping or adjacent to a ***biodiversity sensitive area***.

~~72.~~137. The following table shows how information on sites in or near ***biodiversity sensitive areas*** can be presented. ~~The undertaking may provide information about the location of the plant (e.g., country and site name) without specifying its exact address.~~

Location	**Area** (hectares)	**Biodiversity sensitive Area**	**Specification** (located in/near biodiversity sensitive areas)
Country – Site name 1			
Country – Site name 2			
Country – Site name 3			
...			

~~51. For the purposes of this [draft] Standard, the term 'near' should be interpreted as meaning an area that is (partially) overlapping or adjacent to a ***biodiversity sensitive area***.~~

Documentation Sources:

Data	*Documentation Source*
Natura 2000 Network of protected areas	https://natura2000.eea.europa.eu/

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Key Biodiversity Areas – IUCN	https://www.keybiodiversityareas.org/sites/search
UNESCO – World Heritage Centre	https://whc.unesco.org/en/list/

Guidance on how to calculate and report land-use

~~52. The undertaking may disclose in units of area (e.g., m² or ha) on land use using guidance provided by the EMAS:~~

~~(a) its total use of land,~~

~~(b) its total ***sealed area***,~~

~~(c) its total ***nature-oriented area*** on site, and~~

~~(d) its total ***nature-oriented area*** off site.~~

138. A '***sealed area***' is to be understood as an area where the original soil has been covered (e.g., roads, buildings, parking lots), making it impermeable and resulting in an ***impact*** on the environment.

139. Green area or ***'nature-oriented area'*** is an area that primarily preserves or restores nature. Near natural/green areas may be located on the organisation's site and may include roofs, facades, water-drainage systems or other features designed, adapted or managed to promote biodiversity. Near-natural areas may also be located off the organisation's site if they are owned or managed by the organisation and primarily serve to promote biodiversity.

140. When disclosing according to paragraph 34, the undertaking shall not only consider local impacts but also direct and indirect impacts on biodiversity (e.g. through raw material extraction, procurement, supply chain, production and products, transportation and logistics, and marketing and communications).

~~73.~~ 141. The following table shows how information on how ***land-use*** may be presented.

Land-use type	**Area** (hectares or m²)		
	Previous year	**Reporting year**	**% change**
Total sealed area			
Total nature-oriented area on-site			
Total nature-oriented area off-site			
Total use of land			

Documentation Sources:

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Data	*Documentation Source*
EMAS Guidance	EU Commission Regulation 2018/2026 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2026&rid=2 User's guide https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_part1_0.pdf

~~Metric~~ B 6 – Water

Guidance on how to calculate and report on water withdrawals and water consumption

~~74.~~142. ***Water withdrawal*** relates to the amount of water an undertaking draws into its organisational boundaries from any source during the reporting period. In practice, for most undertakings this relates to the amount of water taken from the public water supply network as indicated in the utility bills. However, where applicable, water withdrawal also includes amounts of water taken from other sources such as groundwater from own wells, water taken from rivers or lakes, or water received by other undertakings. ~~Rainwater~~In the specific case of undertakings operating in agriculture, water withdrawal would include rainwater if collected directly and stored by the undertaking ~~is not considered as water withdrawal~~.

143. Water withdrawal data can be retrieved from measurements, using flow meters or water bills; indeed, in practice, for most undertakings water withdrawal relates to the amount of water taken from the public water supply network as indicated in the utility bills. In cases in which direct measurements are not feasible, or are deemed not sufficient and therefore need to be complemented, data on water withdrawal can be estimated using, for example, calculations models, and industry standards.

144. For example, in the case of a shared office or coworking space, a possible method to calculate the water withdrawal could be to retrieve the overall water withdrawal of the building from the water bill and calculate the water withdrawal per employee with the following equation:

Water withdrawal per employee daily (L) = annual water withdrawal (L) / (n. of employees in the whole shared building x n. of working days)

The undertaking could then multiply the water withdrawal per employee for the number of its employees and the days they worked in the reporting year to obtain the final number required in the datapoint.

To make a numerical example applying the proposed formula, the annual water withdrawal retrieved from the water bill of a coworking space is 1296 m3 (corresponding to 1296000 L), coworking space where 100 employees of different companies work together for an assumed number of 240 days a year. The assumption on the average number of days worked can be based on national statistics, for example. The water withdrawal per employee daily would be in this case:

Water withdrawal per employee daily = 1296000 L / (100x240) = 54 L

145. Assuming now that that the employees of the reporting undertaking are 25 and that they use the coworking space for 220 days a year, the yearly water withdrawal of the undertaking in the coworking space would be the water withdrawal per employee multiplied for the number of its employees and the days worked, therefore 54Lx25x220 = 297000 L (corresponding to 297 m3).

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146. This calculation could be useful when it is possible to access the water bill of the shared building. This simple calculation method has some limitations, as it does not consider, for example, differences in use between different parts of the building (e.g. a seven-floor building could have six floors dedicated to offices and one floor with a canteen or a restaurant), which the undertaking might be able to overcome, if additional data are available, further refining the basic calculation provided above as an example.

147. An alternative way to obtain water withdrawal data in the example of shared offices, when it is not possible to retrieve the water bill could be to calculate it using fixture flow rates and occupancy data as primary inputs. A possible formula could be:

Total water withdrawal =
∑(Flow Rate×Number of Uses per Day×Number of Days per Year×Occupancy)

where:

a) flow rates or each fixture can be retrieved from the project documentation or labels of the fixtures, for example, or estimated basing on average data publicly available, if more accurate information is not retrievable;

b) the number of uses per day can be estimated based on averages publicly available;

c) 'number of days' stands for the number of operational days for the reporting undertaking in a year;

d) 'occupancy' represents the number of employees of the undertaking using the office; it's often calculated as full-time equivalent (FTE); and

e) the sign ∑ indicates that the calculations for each fixture should be summed up to obtain the total water withdrawal of the reporting undertaking operating in a shared office.

148. An additional possible source that could support the reporting of water withdrawal for undertakings operating in shared offices is the JRC Level(s) indicator 3.1: Use stage water consumption user manual as well as additional related documents and calculation sheets (see PG Section Documents | Product Bureau (europa.eu)). Furthermore, the undertaking could consult EMAS Reference Document for the Public Administration sector and EMAS Reference Document for the Construction sector, as well as rating systems like the National Australian Built Environment Rating System (NABERS), and certifications like the Building Research Establishment Environmental Assessment Method (BREEM), the Leadership in Energy and Environmental Design (LEED) and the German Sustainable Building Council (DGNB) System for Buildings In Use, which might provide useful indications in their methodologies on how to further refine the calculation for water withdrawal in offices and shared spaces.

149. The provided examples to obtain water withdrawal data in the case of shared offices can be transposed to and applied by undertakings operating in different sectors, with adjustments that might be necessary for the sectoral and entity-specific situation the undertaking operates in. EMAS Sectoral Reference Documents (SRDs) could be consulted for sector-specific methodology and indicators on water withdrawal as well as industry standards and benchmarks.

~~75.~~150. ***Water consumption*** is the amount of water drawn into the boundaries of the undertaking that is not discharged or planned to be discharged back into the water environment or to a third party. This typically relates to water evaporated – e.g.~~,~~ in thermal energy processes like drying or power production – water embedded in products – e.g.~~,~~ in food production – or water for irrigation purposes – e.g., used in agriculture or for watering company premises. ~~Collected rainwater can be considered in the calculation of water consumption, as a separate input from water withdrawal.~~

~~76.~~151. **Water discharge** means, for example, the amount of water transferred directly to receiving water bodies such as lakes or rivers, the public sewer or to other companies for cascading water use. It can be seen as the water output of the undertaking.

~~77.~~152. ***Water consumption*** can therefore be calculated as:

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Water consumption = Water [Inputs – Water Outputs

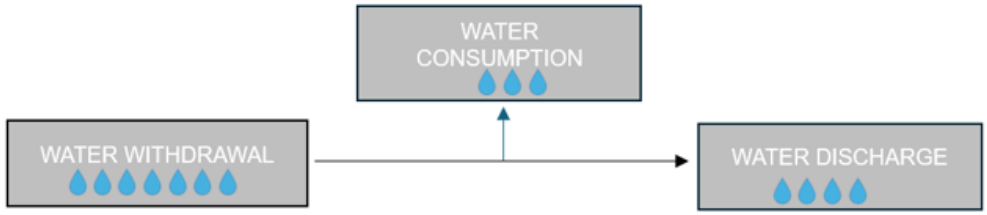
or in other words:

Water consumption = (Water withdrawal ~~+ rainwater harvest –~~) – Water discharges.]

For undertakings that solely withdraw water from the public water network and discharge it into the sewer, water consumption will be close to zero and can therefore be omitted from the report.

More broadly, the applicability of the disclosure requirement on water consumption relates to information already requested by law, already reported, and/or appropriate for the sector.

153. A schematic view of the relationship between water withdrawal, water consumption and water discharge can be seen in the image below:



~~78.~~154. The undertaking may provide additional explanatory information to contextualise its water withdrawals or consumption. For example, the undertaking may highlight if rainwater is collected and used as a replacement for~~of~~ tap water or if water is discharged into other parties for cascading use.

~~79.~~155. Below can be found an example of how undertakings may present quantitative information on their withdrawals, discharges and consumption of water divided by site location.

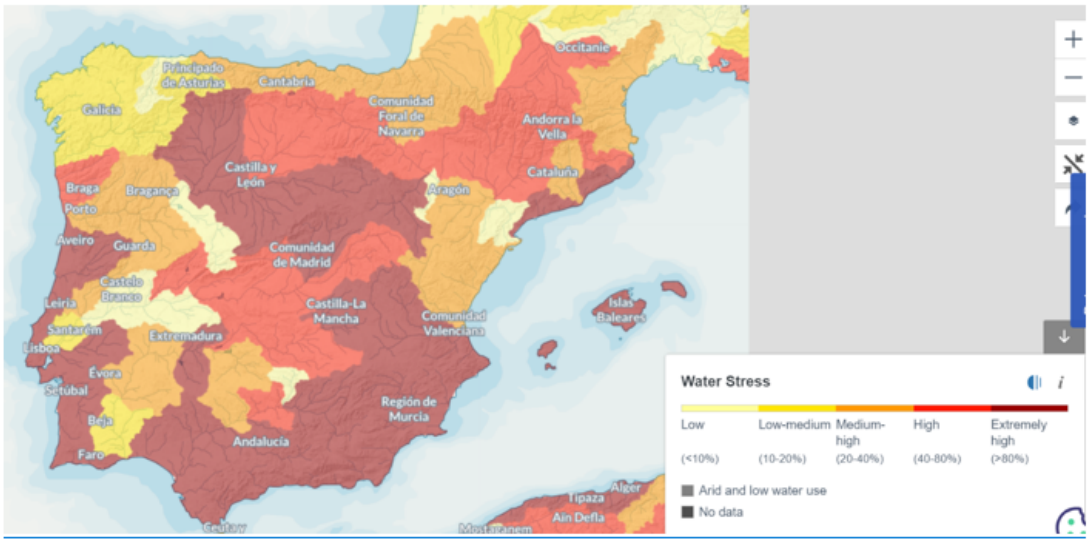
	Water withdrawal E.g.~~,~~ m³	**Water consumption** E.g.~~,~~ m³ (if applicable)
All sites		
Sites in areas with water stress		

Guidance for determining whether~~if~~ the undertaking operates in an area of high-water stress

~~80.~~156. ~~To determine if the~~The undertaking ~~operates in an area of high-water stress, you~~ can consult ~~the~~local (e.g. national, regional) water authorities of the ~~places you operate~~place(s) it operates in to ~~understand their~~inform its assessment of ~~the~~ water resources for ~~that~~the specific location~~. Alternatively, you~~(s), including the identification of areas of high-water stress. The undertaking can also consult publicly available and free tools that map out water scarcity globally. One such tool is the WRI's Aqueduct Water Risk Atlas~~.~~, which provides an interactive map of a water stress indicator (the 'baseline water stress', which measures the ratio of total water demand to available renewable surface and groundwater supplies) at sub-basin level. With the help of this tool, undertakings can consult the water stress baseline set for different river basins globally. ~~By way~~Values of ~~illustration,~~ the ~~map below shows the main Iberian river basins and their~~baseline water stress ~~classification according to the WRI Aqueduct~~ indicator above 40% indicate an area of high-water stress.

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157. By way of illustration, the map below shows the main Iberian River basins and their water stress classification according to the WRI Aqueduct.



~~81.~~ In this image several water basins in the Iberian Peninsula, along with their water stress classification, can be observed. Most of the southern part of the peninsula sits in an area of significant high-water stress – with the exception of the Guadiana basin (in yellow). Thus, if the undertaking has operations within the Guadalquivir basin (e.g.~~,~~ the Andalucia region, which has a significant high-water stress level), the undertaking would have to disaggregate its ***water consumption*** for that region/water basin. But if its operations take place within the southern part of the Guadiana river basin (where there is low water stress), then it would not be necessary to disaggregate its water consumption for that region/water basin.

158. Other possible tools that undertakings can consult to determine their location in water stressed areas are the static map (and related dataset) provided by the European Environment Agency (EEA) Water Exploitation Index plus (WEI+) for summer and Urban Morphological Zones (UMZ) and the interactive map Water exploitation index plus (WEI+) for river basin districts (1990-2015), both presenting the water stress indicator WEI+, that measures total water consumption as a percentage of the renewable freshwater resources, at sub-basin level. WEI+ values equal or greater than 40% generally indicate situations of high-water stress. It's worth underlining that WRI Aqueduct bases its baseline water stress indicator on water demand, while the EEA indicator of water stress WEI+ is based on water consumption.

Documentation Sources:

Data	*Documentation Source*
Water withdrawal in shared offices (measurement)	'Water use in your business', South Staff Water
Water withdrawal in shared offices (measurement, estimation)	Level(s) indicator 3.1: Use stage water consumption user manual: introductory briefing, instructions and guidance (Publication version 1.1), JRC
Water withdrawal (general)	EMAS User Guide
Water withdrawal in SMEs	EMAS "easy" for small and medium enterprises

Water stress – WRI Aqueduct	Technical Note - Aqueduct 4.0: Updated decision-relevant global water risk indicators, WRI
Water stress – WEI+	Water scarcity conditions in Europe (Water exploitation index plus) | European Environment Agency's home page (europa.eu)

~~Metric~~ B 7 – Resource use, circular economy and waste management

Guidance on circular economy principles

~~82.~~159. When disclosing information on its products, material use and waste management, the undertaking may provide information in relation to ***circular economy*** principles. Circular economy principles are articulated in the paragraphs below. The key principles outlined by the Ellen Macarthur Foundation are underlined below while the key principles considered by the European Commission are *italicised*.

Eliminate waste and pollution – this can be done through process improvements and also through design considerations at the level of *usability, reusability, repairability, disassembly* and *remanufacturing*.

Circulate products and materials (at their highest value) – *reusability* and ***recycling*** are key for product circulation, but this is enhanced if special consideration is given to circularity at the design phase for issues such as usability, reusability, repairability, remanufacturing and disassembly. Factors such as the incorporation of biomaterials and their *recirculation via the biological cycle* can also be considered, for example, using biodegradable crop covers instead of plastics in agriculture.

Regenerate nature – whenever possible, human activities should seek to regenerate nature and improve or restore key ecological functions (i.e., drainage, habitat provision, thermal regulation, etc.) that may have been lost due to previous human activities.

~~**Guidance on the rate of recycled content in products and packaging**~~

~~53. When compiling the rate of its recycled content – that is, by adding inputs into the process that have originated from recycled materials – in its products (i.e., its produced goods or materials) and packaging, the undertaking may use as denominator the total weight of recycled materials used in products and packaging (during the reporting period) divided by the total weight of materials in products and packaging (during the reporting period).~~

~~**Guidance on the rate of recyclable content in products and packaging**~~

~~54. When compiling the rate of its recyclable content – that is, materials that can be technically recycled – the undertaking may use as denominator the total weight of materials that are recyclable in products and packaging (during the reporting period) divided by the total weight of materials in products and packaging (during the reporting period).~~

~~**Guidance on how to identify manufacturing and/or packaging processes**~~

~~55. To identify manufacturing and/or packaging processes, the undertaking may refer to those activities that fall under "Section C – Manufacturing" and Section F "Construction" of Annex I to Regulation (EC) No 1893/2006[12].~~

~~[12] L_2006393EN.01000101.xml (europa.eu).~~

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Guidance on total waste generation and waste diverted to recycling or reuse

160. The requirements in paragraph 38 may be omitted by undertakings that generate only household waste. In such cases, the undertaking will only state that it generates this type of waste.

161. When reporting on ***hazardous waste*** according to paragraph 38 (a), the undertaking fulfils the requirements on radioactive waste of indicator number 9 from Table #1 of Annex 1 of the Sustainable Finance Disclosure Regulation (SFDR)[13]. This SFDR indicator (ratio between tonnes of radioactive and hazardous waste) can be computed by using the numerator and denominator that the undertaking provides when reporting according to paragraph 38 (a).

162. SMEs must disclose ***hazardous and radioactive waste*** if their operations involve generating such waste. Applicability depends on the presence of hazardous or radioactive materials in business processes.

163. Undertakings are recommended to classify their ***hazardous waste*** using the European Waste Catalogue (EWC), which categorises waste by type. Any waste marked with an asterisk (*) is classified as hazardous in the EWC, normally with reference to 'containing hazardous substances'. For example:

(a) medical sector: contaminated sharps like needles and syringes used in medical settings ('wastes whose collection and disposal is subject to special requirements in order to prevent infection' EWC Code 18 01 03*), cytotoxic and cytostatic medicines (EWC Code 18 01 08*), spent radiopharmaceuticals, and certain diagnostic equipment containing radioactive materials;

(b) manufacturing sector: used lubricants and oils classified as hazardous (EWC Code 13 02 05*);

(c) construction sector: asbestos-containing materials (EWC Code 17 09 03*), soil and stones containing hazardous substances (EWC Code 17 05 03*), and

(d) batteries and accumulators: lead batteries (16 06 01*), Ni-Cd batteries (16 06 02*), batteries containing mercury (16 06 03*).

164. Nevertheless, a waste is considered hazardous if it displays one or more of the hazardous properties listed in Annex II of the Waste Framework Directive. For easier reference, these are presented below together with the respective pictograms to help identify hazardous properties such as flammability, toxicity, and corrosiveness, which may lead to waste being classified as hazardous.

165. ***Radioactive waste*** also has or can have hazardous properties that render it hazardous, namely carcinogenic, mutagenic or toxic for reproduction. Nevertheless, radioactive substances are subject to separate regulations within the EU[14]. Companies using radioactive materials with the ability of generating radioactive waste subject to EU regulation will be aware of it. Radioactive waste should be identified based on the presence of radionuclides at levels above regulatory clearance thresholds.

166. ***Radioactive waste*** can be present in a variety of items such as medical, research and industrial equipment, smoke detectors, or sludges.

167. Hazard Pictograms for each hazard class are presented below.

[13] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

[14] EU's Radioactive Waste and Spent Fuel Management Directive (2011/70/Euratom). For more information see the EU's webpage on Radioactive Waste and spent fuel.

Annex 2: Mark-up from VSME ED

Hazard pictogram	Pictogram statement, symbol and class	What does it mean?
	**'Gas under pressure'** *Symbol: Gas cylinder* Physical Hazard	• Contains gas under pressure; may explode if heated • Contains refrigerated gas; may cause cryogenic burns or injury
	**'Explosive'** *Symbol: Exploding bomb* Physical Hazard	• Unstable explosive • Explosive; mass explosion hazard • Explosive; severe projection hazard • Explosive; fire, blast or projection **hazard** • May mass explode in fire
	**'Oxidising'** *Symbol: Flame over circle* Physical Hazard	• May cause or intensify fire; oxidiser. • May cause fire or explosion; strong oxidiser.
	**'Flammable'** *Symbol: Flame* Physical Hazard	• Extremely **flammable gas** • Flammable gas • Extremely flammable aerosol • Flammable aerosol • Highly flammable liquid and vapour • Flammable liquid and vapour • Flammable solid
	**'Corrosive'** *Symbol: Corrosion* Physical Hazard / Health Hazard	• May be corrosive to metals • Causes severe skin burns and eye damage

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Annex 2: Mark-up from VSME ED

	**'Health hazard/Hazardous to the ozone layer'** *Symbol: Exclamation mark* Health Hazard	• May cause respiratory irritation • May cause drowsiness or dizziness • May cause an **allergic skin reaction** • Causes serious eye **irritation** • Causes skin irritation • Harmful if swallowed • Harmful in contact with skin • Harmful if inhaled • Harms public health and the environment by destroying ozone in the upper atmosphere
	**'Acute toxicity'** *Symbol: Skulls and Crossbones* Health Hazard	• Fatal if swallowed • Fatal in contact with skin • Fatal if inhaled • Toxic: if swallowed • Toxic in contact with skin • Toxic if inhaled
	**'Serious health hazard'** *Symbol: Health Hazard* Health Hazard	• May be fatal if swallowed and **enters airways** • Causes **damage to organs** • May cause damage to organs • May damage fertility or the unborn child • Suspected of damaging fertility or the unborn child • May cause cancer • Suspected of causing cancer • May cause **genetic defects** • Suspected of **causing genetic defects** • May cause allergy or asthma symptoms or breathing difficulties if inhaled

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	**'Hazardous to the environment'** *Symbol: Environment* Environmental Hazard	• Very toxic to aquatic life with long lasting **effects** • Toxic to aquatic life with long lasting effects

Pictograms that indicate hazardous properties, Annex V, from the Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008

168. When presenting information on its waste generation or diversion from disposal, the undertaking should preferably report such information in units of weight (e.g. kg or tonnes). Nevertheless, should the units of weight be considered an inappropriate unit by the undertaking, they may alternatively disclose the afore-mentioned metrics in volumes (e.g. m3) instead.

169. When disclosing information on the total annual waste diverted to recycling or reuse, the undertaking should consider the waste that is sorted and sent to recycling or reuse operators (e.g. the amount of waste put into recycling container or sorting of waste into certain categories of materials and their delivery to waste treatment facilities), rather than the waste that gets effectively recycled or reused.

~~83.~~170. When disclosing information on waste, the undertaking may adopt the following tables.

	Waste generated (e.g., tonnes)		
	Total waste generated, of which:		
		Waste diverted to recycle or reuse	*Waste directed to disposal*
Non-hazardous waste			
Type of waste1			
Type of waste2			
...			
Hazardous waste			
Type of waste1			
...			

~~84.~~171. Examples of ***hazardous wastes*** that small businesses may generate include batteries, used oils, pesticides, mercury-containing equipment and fluorescent lamps.

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~~85.~~172. The undertaking may provide further breakdowns specifying further types of non-hazardous and ***hazardous wastes***. In doing so it may consider the list of waste descriptions found in the European Waste Catalogue's social metrics.

Guidance on the annual mass-flow of relevant materials used

173. The annual mass-flow is an indicator aligned with the EMAS requirements on efficiency of material consumption, and it illustrates an undertaking's dependency on specific materials in its operations (e.g. wood and steel for the construction industry). The undertaking is here required to provide information on the materials it uses, including both the materials acquired from suppliers and those sourced internally from production. To compute the annual mass-flow of the relevant materials it has used, the undertaking will need to first identify the specific key materials on which its operations are dependent and for which material efficiency needs to be evaluated (e.g. material efficiency of wood). If different types of materials are used, the undertaking will need to provide separately the annual mass-flow (i.e. total weight for each relevant material used; e.g. tonnes of wood purchased) for each key material in an appropriate manner, for example by breaking it down by the use to which they are put (EMAS, 2023). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products, or others (excluding energy sources and water) and provide the total weight for each relevant material used (e.g., tonnes of wood purchased). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products, or others (excluding energy sources and water).This indicator is to be preferably expressed in units of weight (e.g. kilograms or tonnes), volume (e.g. m^3) or other metric units commonly used in the sector.

Guidance on how to identify manufacturing, constructions and /or packaging processes

174. To identify manufacturing, construction and/or packaging processes, the undertaking may refer to the activities that fall under 'Section C – Manufacturing', Section F 'Construction' as well as Class 'N82.92 Packaging activities' of Annex I to Regulation (EC) No 1893/2006[15].

Basic Module Guidance - Social Metrics

~~Metric~~ B 8 – Workforce – General characteristics

~~86.~~175. Full-time equivalent (FTE) is the number of full-time positions in an undertaking. It can be calculated by dividing an employee"s scheduled hours (total effective hours worked in a week) by the employer's hours for a full-time workweek (total hours performed by full-time employees). For example, an employee who works 25 hours every week for a company where the full-time week is 40 hours represents a 0,625 FTE (i.e. 25/ 40 hours).

~~87.~~176. ~~Head count~~Headcount is the total number of people employed by the undertaking at a given time.

Guidance on how to present information about employees' contract types

~~88.~~177. The following table shows how information on ***employees*** may be presented by type of employment contract.

Type of contract	Number of employees (headcount or full-time equivalents ~~or head count~~)
Temporary contract	
Permanent contract	
Total employees	

[15] L_2006393EN.01000101.xml (europa.eu).

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178. The following table shows how information on ***employees*** may be presented by gender.

Gender	Number of employees (headcount or full-time equivalents ~~or head count~~)
Male	
Female	
Other	
Not reported	
Total employees	

~~89.~~179. In some European Union Member States, it is possible for people to legally register themselves as having a third gender, often neutral, which is to be categorised as "other" in the table above. If the undertaking is disclosing data about ***employees*** where this is not possible, it may explain this and indicate that the "other" category is not applicable. The "not reported" category applies to employees who do not disclose their gender identity.

~~90.~~180. The following table shows how information on employees may be presented by countries.

Country (of employment contract)	Number of employees (headcount or full-time equivalents ~~or head count~~)
Country A	
Country B	
Country C	
Country D	
Total employees	

~~91.~~181. Definitions and types of employment contracts may vary depending on the country. If the undertaking has ***employees*** working in more than one country, it shall use the legal definitions stipulated in the national laws of the countries where the employees are based in to calculate country-level data. Such country-level data shall then be added up to calculate total numbers, disregarding differences in national legal definitions.

182. Employee turnover refers to employees who leave the organisation voluntarily or due to dismissal, retirement or death in service.

183. In order to calculate the ***turnover*** rate, the formula below should be used:

$$\frac{Number\ of\ employees\ who\ left\ during\ the\ reporting\ year}{Average\ number\ of\ employees\ during\ the\ reporting\ year}\ x\ 100$$

~~Metric~~ B 9 – Workforce – Health and safety

Guidance on the rate of recordable work-related accidents

~~56. In order to calculate the rate of ***recordable work-related*** accidents, the formula below should be used:~~

$$\frac{Number\ of\ work\ related\ accidents\ in\ the\ reporting\ year}{Total\ number\ of\ hours\ worked\ in\ a\ year\ by\ all\ employees}\ x\ 200{,}000$$

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~~92.~~184. Based on the assumption that one full-time worker works 2,000 hours per year, the rate indicates the number of work-related accidents per 100 full-time workers over a yearly timeframe. If the undertaking cannot ~~directly~~ calculate directly the number of hours worked, it may estimate this on the basis of normal or standard hours of work.

185. In order to calculate the rate of ***recordable work-related*** accidents of employees, the formula below should be used.

$$\frac{Number\ of\ work\ related\ accidents\ in\ the\ reporting\ year}{Total\ number\ of\ hours\ worked\ in\ a\ year\ by\ all\ employees}\ x\ 200{,}000$$

Example

~~93.~~186. Company A reported three work-related accidents in the reporting year. Company A has 40 employees, and a total number of 80,000 hours (40 x 2,000) worked in a year.

The rate of ***recordable work-related*** accidents is 3/80,000 x 200,000 = 7.5.

Guidance on number of fatalities resulting from work-related injuries and work-related ill health

~~94.~~187. Work-related injuries and work-related ill health arise from exposure to dangers at work.

~~95.~~188. In case of teleworking, injuries and ill health are work-related if the injury or ill health is directly related to the performance of work rather than the general home environment.

~~96.~~189. In case of injuries and ill health that occur while a person is travelling for work, these are considered work-related if the ***employee*** was performing work activities in the interest of the employer at the time of the injury or ill health. Accidents taking place when travelling, outside of the undertaking's responsibility (i.e., regular commuting to and from work), are subject to the applicable national legislation, which regulates their categorisation as to whether they are considered work-related or not.

~~97.~~190. Mental illness is considered work-related if it has been notified voluntarily by the relevant worker and if an evaluation from a licensed healthcare professional stating that the illness in question is indeed work-related has been issued and notified, too. Health problems resulting from smoking, drug and alcohol abuse, physical inactivity, unhealthy diets, and psychosocial factors not connected to work are not considered work-related.

~~98.~~191. The undertaking may present separately ~~the~~ fatalities resulting from work-related injuries and those resulting from work-related ill health.

~~Metric~~ B 10 – Workforce – Remuneration, collective bargaining and training

Guidance on remuneration: ~~ratio of entry level to~~ minimum wage

~~57. 'Significant proportion of employees' refers to the majority of employees in the undertaking without considering interns and apprentices.~~

~~58. 'Entry level~~ 'Minimum wage' refers to ~~full time wage in the lowest employment category. The wages of interns and apprentices shall not be considered when identifying the entry level wage of the undertaking.~~

~~99.~~192. ~~'Minimum wages' refer to~~ the minimum compensation of employment per hour~~,~~ or another unit of time~~, allowed by law~~. Depending on the country, the minimum wage might be set directly by law or through collective bargaining agreements. The undertaking shall refer to the applicable minimum wage for the country it reports on ~~(whether set directly by law or through a collective bargaining agreement).~~ .

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~~In order to calculate the ratio of entry level wage to minimum wage, the formula below shall be used:~~

$$Ratio = \frac{\text{Entry level wage}}{\text{Minimum wage}}$$

193. For the lowest ***pay*** category, excluding interns and apprentices, minimum ***wage*** serves as the foundation for calculating entry-level wage. Therefore, entry-level wage includes pay equal to minimum wage as well as any additional fixed payments guaranteed to employees in that category.

Guidance on remuneration: percentage gap between female and male employees

~~100.~~194. The metric for the percentage gap between female and male ***employees*** addresses the principle of gender equality, which stipulates equal ***pay*** for equal work. The pay gap is defined as the difference of average pay levels between female and male employees expressed as the percentage of the average pay level of male employees.

~~101.~~195. In order to estimate this metric, all ***employees*** shall be included in the calculation. In addition, there should be two separate average ***pay*** calculations for female and male employees. See the formula below:

$$\frac{(Average\ gross\ hourly\ pay\ level\ of\ male\ employees - average\ gross\ hourly\ pay\ level\ of\ female\ employees)}{Average\ gross\ hourly\ pay\ level\ of\ male\ employees} \ x\ 100$$

~~102.~~196. Depending on the undertaking's remuneration policies, ~~the~~ gross ***pay*** refers to all of the following elements:

(a) base salary, which is the sum of guaranteed, short-term, ~~and~~ non-variable cash compensation;

(b) benefits in cash, which constitute the sum of the base salary and cash allowances, bonuses, commissions, cash profit-sharing, and other forms of variable cash payments;

(c) benefits in kind such as cars, private health insurance, life insurance, and wellness programs; and

(d) direct remuneration, which is the sum of benefits in cash, benefits in kind and the total fair value of all annual long-term incentives.

~~103.~~197. The gross ***pay*** is the sum of all the applicable elements listed above.

~~104.~~198. The average gross hourly ***pay*** is the weekly/annual gross pay divided by the average hours worked per week/year.

Example

199. Company A has *X* male ***employees*** and *Y* female employees in total. Male employees' gross hourly pay is €15 and female employees' gross hourly pay is €13.

200. The average gross hourly pay level of male employees is the sum of all their gross hourly payments divided by the total number of male employees. The average gross hourly pay level of female employees is the sum of all their gross hourly payments divided by the total number of female employees.

201. The formula used to calculate the percentage pay gap between male and female employees is

$$\frac{15 - 13}{15} x\ 100 = \ 13.3\%$$

Guidance on collective bargaining coverage

~~105.~~202. The ***employees*** covered by ***collective bargaining*** agreements are those individuals to whom the undertaking is obliged to apply the agreement. If an employee is covered by more than one collective bargaining agreement, it only needs to be counted once. If none of the employees are covered by a collective bargaining agreement, the percentage is zero.

~~106.~~203. The percentage of ***employees*** covered by ***collective bargaining*** agreements is calculated by using the following formula~~:~~

$$\frac{Number\ of\ employees\ covered\ by\ collective\ bargaining\ agreements}{Number\ of\ employees}\ x\ 100$$

~~107.~~204. The information required by this disclosure requirement may be reported as coverage rates if the ***collective bargaining*** coverage is between 0~~–~~19%, 20–39%, 40–59%, 60–79% or 80–100%.

~~108.~~205. This requirement is not aimed at obtaining the percentage of ***employees*** represented by a works council or belonging to trade unions, which can be different. The percentage of employees covered by ***collective bargaining*** agreements can be higher than the percentage of unionised employees when the collective bargaining agreements apply to both union and non-union members.

Basic Module Guidance - Business Conduct Metrics

~~Metric~~ B ~~12~~11 – Convictions and fines for corruption and bribery

~~109.~~206. ***Corruption*** and bribery fall under the ***business conduct*** sustainability issue ~~matter~~.

~~110.~~207. Under paragraph ~~38~~43, the undertaking shall report on the total number of convictions and the total amount of fines incurred for violating anti-corruption and anti-bribery laws.

Guidance on convictions

~~111.~~208. Convictions for the violation of anti-corruption and anti-bribery laws refer to any verdict of a criminal court against an individual or undertaking in respect of a criminal offence related to ***corruption*** and bribery~~,~~ ~~f~~For example~~,~~ where these court decisions are entered in the criminal record of the convicting European Union Member State.

Guidance on fines

~~112.~~209. Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-corruption and anti-bribery laws imposed by a court, commission or other government authority, which are paid to a public treasury.

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~~Business Partners~~Comprehensive Module: Guidance

210. The guidance below is intended as part of an ecosystem that will include also the development of further ~~implementation guidance~~support guides by EFRAG, further digital tools and implementation support (educational activities, stakeholders' engagement and so forth) aiming to facilitate some of the technical elements present in the guidance.

211. This guidance is intended to support the preparation of ~~the~~ metrics in the ~~Business Partner~~Comprehensive Module.

Comprehensive Module Guidance – ~~Cross-cutting Metrics~~General Information

C-1 – Strategy: Business Model and Sustainability – Related Initiatives

212. When describing the main ***consumers*** and supplier relationships under paragraph 47~~25~~ (c), the undertaking shall disclose the estimated number of suppliers, and their related sectors and geographies (i.e. countries).

C-2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

213. Undertakings may use the following template to report on C2 datapoints.

	If you answered YES to existing practices/policies/ future initiatives in disclosure B2, please briefly describe them along with their consequent actions. (In case the practice/ policy or future initiative covers suppliers or clients, the undertaking shall mention it)	If you answered YES to future initiatives/ targets in disclosure B2, please specify them.	You may indicate the highest senior level in the undertaking accountable for implementing them [if any]
Climate Change			
Pollution			
Water and Marine Resources			
Biodiversity and Ecosystems			
Circular Economy			
Own Workforce			
Workers in the Value Chain			
Affected Communities			

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Consumers and end-users			
Business conduct			

~~113.~~

Comprehensive Module Guidance — Environmental Metrics

~~Governance –~~Entity-specific consideration when reporting on GHG emissions under B 3 (Basic Module) Entity specific disclosure – Energy and greenhouse gas emissions

214. When determining whether disclosure of Scope 3 is appropriate following paragraph 50~~49~~, the undertaking may screen its total Scope 3 GHG emissions based on the 15 Scope 3 categories identified by the GHG Protocol using appropriate estimates and report by incorporating this information by reference. This allows for the identification and disclosure of its significant Scope 3 categories based on the magnitude of their estimated GHG emissions and other criteria provided by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, p. 61 and 65-68) or EN ISO 14064-1:2018 Annex H.3.2, such as financial spend, influence, related transition risks and opportunities or stakeholder views.

~~114.~~ SMEs operating with manufacturing, agrifood, real estate construction and packaging processes are likely to have significant Scope 3 categories (CDP, 2024), which may be considered relevant for reporting in the undertaking's sector.

215.

~~Disclosure~~ BPC 3 – GHG reduction and climate transition

216. Emission reductions can prove to be both a challenge and opportunity for an undertaking, as it often requires changes to the strategic and operational reality of the business. The goal of reducing emissions **~~reduction target~~**may require a review of strategic and financial priorities. Decarbonisation may require important initial investment in, for example, electrifying a fleet of vehicles, implementing new technologies to reduce energy consumption or developing new product lines that are less reliant on carbon-intensive materials. On the other hand, implementing low-carbon solutions to achieve GHG emission reduction can significantly lessen the costs of purchased energy and materials. Undertakings embarking on their decarbonisation journey are often facing important adjustments to their business models or daily operations. For instance, a logistics and delivery services undertaking may need to redesign its fleet management to minimise potential service disruptions due to the need of regular vehicle charging. A consumer goods manufacturing undertaking planning to replace a component of its product with a sustainable, low-carbon alternative may need to allocate time and resources to product innovation and to searching for new suppliers. These efforts can, in turn, result in reducing costs, accessing new markets, creating new workplaces and attracting additional financing, making GHG emission reduction not only a challenge, but also a strategic business opportunity. In this context, targets for GHG reductions are an important measure of responding to the need for a sustainable transition, as they allow undertakings to manage the change in a systematic, controlled and organised way.

~~115.~~217. A GHG emission reduction target ~~constitutes~~is a commitment to reduce the undertaking's GHG emissions in a future year ~~as~~ compared to the GHG emissions measured during a chosen base year. ~~Emission reductions~~Actions that may ~~be achieved~~lead to emission reductions include, for instance, ~~through~~ electrification, renewable electricity, sustainable products development, etc. ~~Removals and avoided emissions do not count as emission reductions.~~ Disclosure ~~BP~~C 3 requires that the undertaking ~~to~~ discloses GHG emission reduction ***targets*** for its Scope 1 and Scope 2 emissions.

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218. Removals and avoided emissions shall not be accounted as reduction of the undertaking's gross GHG emissions. This is due to the important distinction between accounting practices for gross GHG emissions (inventory accounting) and GHG removals and avoided emissions (project-based or intervention accounting). Gross GHG emissions of the undertaking are designed to track the actual emissions released to the environment, providing a consistent and comparable baseline to set up GHG targets. Avoided emissions and carbon removals, on the other hand, relate to specific project activities of the undertaking, which means that their accounting is done separately from gross GHG emissions.

219. To follow this practice, the undertaking needs to distinguish between its gross GHG emissions and other impacts which are not captured in it, such as GHG removals and avoided emissions. Removals refer to the withdrawal of GHG from the atmosphere as a result of deliberate human activities. Examples of such activities can include plant growth (transfer of atmospheric CO2 through photosynthesis) and direct air capture of CO2, and are typically linked to the subsequent storage of CO2. Avoided GHG emissions are typically referred to as emissions that would have otherwise happened, but that, as a result of the undertaking's activities, did not happen. These may include introducing new products and technologies that reduce demand for their carbon-intensive equivalents, for example insulation solutions in a building that avoid the demand for energy services therein. More information on the concepts related to carbon removals and avoided emissions can be found in the GHG Protocol Land Sector and Removals Guidance[16], as well as the WBCSD guidance[17].

~~116.~~220. A base year is a preceding year against which the undertaking's current GHG emissions can be measured. In general, the base year should be a recent and representative year of the undertaking's GHG emissions in which there are verifiable data.

~~117.~~221. The target year is the year in the future in which the undertaking aims to achieve a certain absolute or percentage amount of GHG emission reductions. It should range over a period from one to three years from the base year to a short-term target. Longer term ***targets*** may also be included, for instance, for periods of twenty or thirty years (e.g., 2040 or 2050). Undertakings are encouraged to include target values for the short-term target year of 2030 at the least and, if feasible, for the long-term year of 2050. From 2030 onwards, it is recommended to update the base year and target year for GHG emission reduction targets after every five-year period.

~~118.~~222. To set a target, undertakings should consider the existing scientific evidence on GHG mitigation. The SBTi recommends a cross-sector target in GHG emissions reduction of -42% by the year 2030 and -90% by the year 2050 (base year 2020). The Stockholm Resilience Centre also proposes a 'carbon law' that sets out concrete steps to achieve full decarbonisation by 2050 based on a flexible way of thinking about reducing carbon emissions by halving emissions every decade and increasing renewable energy roll-out exponentially. The authors argued that this roadmap would ensure a 75% chance of keeping the Earth below 2°C above pre-industrial temperatures, the target set out in the Paris agreement.[18] SBTi also proposes a streamlined target-setting route for small- and medium-sized undertakings.[19] Specific pathways also exist by sector and may be considered by undertakings when setting their GHG emission reduction ***targets***.

223. To achieve a quick reduction of both direct and indirect emissions, there are some simple actions that the undertaking can take. Some actions may be easy but still able to deliver a notable emission reduction and support the undertaking reaching its targets. For instance, electrification of the vehicle fleet by replacing vehicles running on fossil fuel with electric vehicles will lead to emission reduction as soon as the previous fleet is replaced. This can mean notable emission reduction especially for a

[16] GHG Protocol Land Sector and Removals Guidance (https://ghgprotocol.org/land-sector-and-removals-guidance)

[17] World Business Council for Sustainable Development (2023). Guidance on Avoided Emissions. (https://www.wbcsd.org/wp-content/uploads/2023/09/Climate-Avoided-Emissions-guidance_WBCSD.pdf)

[18] Rockström, J., Gaffney, O., Rogelj, J. et. al. 2017. A roadmap for rapid decarbonization. Science, Volume 355 Issue 6331. Available at: https://www.stockholmresilience.org/research/research-news/2017-03-23-curbing-emissions-with-a-new-carbon-law.html.

[19] SBTI https://sciencebasedtargets.org/small-and-medium-enterprise-sme-target-setting-process. SBTI offers resources for SMEs to set science based targets: https://sciencebasedtargets.org/small-and-medium-enterprise-sme-target-setting-process.

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business that is reliant on transportation. Similarly, replacing commutes and business travels by car with low carbon alternatives such as bicycles or public transport is an effective, simple and achievable decarbonisation action. Another area of low- hanging fruit is to review the internal energy management and update it to energy-efficient equipment and integrate maintenance into routine business operations. By regularly maintaining equipment and machinery and replacing these with more energy-efficient alternatives when and where possible, the undertaking can reduce its energy consumption. Such equipment can include, for example, boilers, telecommunication systems, heat pumps, air-conditioning etc. Through regular maintenance their efficient operation can be ensured, wear and tear minimised and waste minimised. By also automating systems and using timers to define periods of use, the undertaking is able to lower the emissions of such equipment even further.

~~Disclosure BP4 – Transition plan for climate change mitigation~~

~~119.~~224. A climate transition plan for climate change mitigation is a set of present and future *actions* meant to align the undertaking's business model, strategy and operations with the key overarching global goal of limiting global warming to 1.5°C. Underpinned by a GHG reduction target compatible with that goal, the importance of having a transition plan in place lies in the ability of understanding the means by which the undertaking will move towards a low-carbon economy while keeping track of the progress made. A transition plan serves as a mechanism for accountability and transparency prompting undertakings to develop credible pathways for mitigating climate change through their *actions*.

225. ~~A~~Establishing a credible transition plan for the undertaking is something that should ~~*(a)* identify~~be supported by elements such as *(a)* identifying clear responsibilities and roles; *(b)* ~~be integrated~~integrating the plan into the undertaking's business strategy and financial planning; *(c)* ~~include~~including information on decarbonisation levers and pathways as well as quantifiable indicators that can be monitored throughout predefined timeframes; *(d)* ~~allow~~allowing for regular reviewing and updating after stakeholder consultations when appropriate; and *(e)* ~~cover~~covering the entirety of its own operations and, to the largest possible extent, the ***value chain*** or else providing~~ovide~~ an explanation as to any limitation.

226. Undertakings that are disclosing ***targets*** according to the EMAS Regulation Annex IV B (d) may use its GHG reduction targets to fulfil the VSME requirement if it has set such targets. The undertaking may also support this disclosure through its implementation of the EMAS environmental management system and link to EN ISO 14001:2015 as set out by EMAS Regulation Annex II B A.6.2.1 and B.5 (environmental objectives).

~~120.~~

Guidance on how to identify manufacturing, constructions and /or packaging processes

227. To identify manufacturing, construction and/or packaging processes, the undertaking may refer to these activities that fall under 'Section C – Manufacturing', Section F 'Construction' as well as Class 'N82.92 Packaging activities' of Annex I to Regulation (EC) No 1893/2006.

~~Disclosure BP-5 –~~C 4 – ~~Physical~~ Climate ~~risks from climate change~~

228. ***Climate-related ~~physical risks~~hazards*** are drivers of climate-related physical risks that arise from the effects that climate change has on the undertaking. They can be classified into acute hazards~~physical risks~~, which arise from particular events (such as droughts, floods, extreme precipitations and wildfires), and chronic ~~physical risks~~hazards (such as changing temperatures, sea level rise and soil erosion), which arise from long ~~or~~ term changes in the climate (Commission delegated regulation 2021/2139). Physical risks are a function of climate-related hazards, the exposure of the undertaking's assets and activities to these hazards, and how sensitive the undertaking is to these hazards ~~are~~. Examples of climate-related hazards are heat waves, increased frequency of extreme weather events, sea level rise, glacial lake outburst flood, and change in precipitation and wind patterns. Climate-related physical risks can be identified and modelled by using climate scenarios that consider high emissions trajectories such as IPCC SSP5-8.5.

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229. ***Climate-related transition events*** may be (according to TNFD classification) policy- and legal-based (e.g. enhanced emission-reporting obligations), technology-based (e.g. costs of transition to lower emissions technology), market-based (e.g. increased cost of raw materials) and reputation-based (e.g. increased stakeholder concern).

~~121.~~230. ***Gross climate-related risks*** refer to gross physical risks and gross transition risks that may result from exposure of the undertaking's assets and business activities to climate-related hazards.

Comprehensive Module Guidance - Social Metrics

Disclosure ~~BP 6 – Hazardous waste and radioactive waste~~C 5 – Additional (general) workforce characteristics

231. To determine the gender ratio, divide the number of female employees by the number of male employees at management level. This will yield the proportion of women to men in your company.

~~59. Nuclear waste can be present in a variety of situations, from smoke detectors to sludges to naturally occurring radioactive materials. It can also be present in special equipment used in industry, research facilities and healthcare as well as in other objects.~~

~~60. The undertaking may disclose its share of radioactive waste, which is calculated as a percentage of the total amount of ***hazardous waste*** as reported in the Basic Module B 7.~~

~~61. Below may be found an example of the radioactive waste ratio calculation:~~

$$\textit{Radioactive waste ratio} = \frac{\textit{Radioactive waste (t)}}{\textit{Hazardous waste (t)}} \times 100$$

~~**Social Metrics**~~

$$\textit{Gender ratio} = \frac{\textit{number of female employees at management level}}{\textit{number of male employees at management level}}$$

232. Management level is considered the level below the board of directors unless the undertaking has a specific definition to use.

233. For example, if there are 28 female employees and 84 male employees at management level, the gender ratio would be 1:3, meaning that for every woman at management level, there are three men.

234. Relevant factors for an undertaking to consider in deciding whether or not to disclose the number of self-employed workers and temporary workers under paragraph 60 would be: (1) the ratio of employees to self-employed and temporary workers, especially in case of significant and/or increasing reliance **or** (2) when the risk of negative social impacts on self-employed or temporary workers is greater compared to the undertaking's own employees.

235. The following table shows how information on self-employed people without personnel that are working exclusively for the undertaking and temporary workers provided by undertakings primarily engaged in employment activities may be presented.

Types of workers	Number of self-employed people and temporary workers engaged in employment activities

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Total self-employed without personnel that are working exclusively for the undertaking	
Total temporary workers provided by undertakings primarily engaged in employment activities	

236. Undertakings can refer to NACE Code N78 for temporary workers provided by undertakings primarily engaged in 'employment activities'.

~~Disclosure~~ **C 6 – Human rights policies and processes**

237. Undertakings that have a due diligence process for human rights in place should answer positively (YES) and should clarify the contents of the policies and/or processes using the drop-down menu.

Disclosure C 7 – Severe negative human rights incidents

~~122.~~238. A "confirmed incident" refers to a legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms.

Comprehensive Module Guidance - **Business ~~Model~~Conduct Metrics**

~~Disclosure~~ ~~BP~~C ~~8~~1 – Revenues from certain sectors and exclusion from EU reference benchmarks

~~62. In accordance with paragraph 74, the undertaking shall declare if it is active in the following sectors, specifying the corresponding revenues:~~

~~(a) the manufacturing of controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons (controversial weapons are prohibited by international law because of the indiscriminate harm they can cause to people, including serious bodily harm and death during or past the ending of military conflicts);~~

~~(b) the cultivation and production of tobacco;~~

~~(c) the fossil fuels (coal, oil and gas) sector (i.e., revenues arising **from** the exploration, mining, extraction, production, processing, storage, refining or distribution of fossil fuels, including their transportation, storage and trade); and~~

239. ~~the~~**Fossil fuels**, as defined in Article 2(62), of Regulation (EU) 2018/1999 of the European Parliament and the Council, are non-renewable carbon-based energy sources such as solid fuels, natural gas and oil.

~~(d)~~240. The **production of chemicals**~~, i.e.,~~ refers to the activities listed under ~~the~~ Division 20.2 of Annex I to Regulation (EC) No 1893/2006, ~~which involve~~i.e. the manufacturing ~~"....~~of pesticides and other agrochemical products~~").~~

~~63. Criteria regarding those sectors have been stipulated in certain legislation applicable to the financial sector; hence, those sectors have been identified by lenders and investors as carrying sustainability risks.~~

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241. As defined by Article 12.1 and 12.2 of the Commission Delegated Regulation (EU) 2020/1818, the companies excluded from EU Paris-aligned Benchmarks are the following:

(a) companies that derive 1 % or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;

(b) companies that derive 10 % or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;

(c) companies that derive 50 % or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; and

(d) companies that derive 50 % or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO2 e/kWh.

~~Disclosure BP-2 – Responsibilities~~C 9– Gender diversity ratio in ~~relation to sustainability matters~~governance body

~~123.~~242. The ***governance*** body refers to the highest decision-making authority in a company. Depending on the jurisdiction the company is in and its legal entity classification, the governance body can vary in format.

~~124.~~243. ~~The~~Based on the requirements in the SFDR, the gender diversity ratio of the ***governance*** body is calculated as an average ratio of female to male board members.

$$Gender\ diversity\ ratio = \frac{the\ number\ of\ female\ members}{the\ number\ \ of\ male\ members}$$

Example

~~125.~~244. ~~A certain~~The ***governance*** body of a certain SME is composed of six members, including three women. The gender diversity ratio is one – for every female member there is one male member.

BP 7 – Alignment with internationally recognised instruments

64. The undertaking shall disclose how it manages actual and potential negative impacts on people's human rights. This means that the undertaking shall disclose whether it has policies in place that commits it to respecting human rights, including labour rights, as defined by the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Such policies can take many forms, and they have no definitive template or structure. Efforts to implement such policies can include the provision of specific ***training*** on human rights for ***employees*** as well as efforts to map out supply chains in order to proactively identify issues related to child labour or forced labour, particularly in higher risk contexts.

65. Human rights in the workplace include the right to a safe and healthy working environment; the right to freedom of association and the right to ***collective bargaining***, the elimination of discrimination, including the right to equal pay for work of equal value; and the elimination of child labour and forced labour.

66. International instruments such as treaties, conventions, principles, and guidelines constitute the common reference ground upon which the undertaking shall develop policies related to human rights (see the CSRD Article 29 b 2 b). These policies could signal to internal and external stakeholders that an undertaking is taking steps to embed human rights in its business operations and relations.

Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations

67. A human rights ***policy*** sets out how the undertaking respects human rights by having processes in place to identify, prevent, mitigate and account for how the undertaking addresses its actual or potential adverse human rights impacts. Examples of mechanisms used to report human rights violations include the provision of channels such as ***grievance*** procedures, general complaints and whistleblower complaints through which ***employees*** can raise concerns or file complaints related to human rights, including labour rights.

Disclosure BP 9 – Violations of OECD guidelines by multinational enterprises or the UN Guiding Principles (including the principles and rights set out in the eight fundamental conventions of the ILO Declaration and the International Bill of Human Rights)

68. If applicable, the undertaking shall disclose whether there have been any violations of human rights during the reporting year. The UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises provide a comprehensive overview and list of human rights.

Disclosure BP 10 – Workforce – Work-life balance

69. The undertaking shall disclose separately the percentage of those ***employees:***

(a) who can take family related leave in the reporting year, with a breakdown by gender, and

(b) who used family related leave in the reporting year, with a breakdown by gender.

70. To calculate this percentage, the same methodology used for social metrics in the Basic Module should be used for the sake of consistency, which means that ***employees*** can be counted in full time equivalents or headcount.

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71. Family related leave includes maternity leave, paternity leave, adoption leave, parental leave, dependents' leave and carer's leave. The definition and scope of family related leave is stipulated in national laws.

Disclosure BP 11 – Number of apprentices

72. The undertaking shall disclose the number of apprentices it has in the reporting period based on the applicable national definitions and schemes of ***apprentices***.

73. The number of apprentices refers to the number of apprentices who work in the undertaking during the reporting year. For example, if the undertaking has a December year end, an apprentice that starts their contract in year x1 and finishes in year x2 should be included in this disclosure in year x1 and year x2.

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Appendix A: Defined terms

This appendix is an integral part of this [draft] Standard.

Defined term	Definition
Accident prevention	Accident prevention refers to the policies and initiatives to prevent workplace accidents and ensure the safety and well-being of employees. This not only includes measures to reduce physical risks but also involves fostering a safe and inclusive work environment free from discrimination and harassment.
Actions	Actions refer to (i) actions and actions plans (including transition plans) that are undertaken to ensure that the undertaking delivers against targets set and through which the undertaking seeks to address material impacts, risks and opportunities; and (ii) decisions to support these with financial, human or technological resources.
Affected communities	People or group(s) living or working in the same geographical area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the undertaking's operations (local communities) to those living at a distance. Affected communities include actually and potentially affected indigenous peoples.
~~Apprentice~~	~~Apprentice refers to a person who is serving an apprenticeship. Apprenticeships are understood as formal vocational education and training schemes that (a) combine learning in education or training institutions with substantial work based learning in companies and other workplaces, (b) lead to nationally recognised qualifications, (c) are based on an agreement defining the rights and obligations of the apprentice, of the employer and, where appropriate, the vocational education and training institution, and (d) with the apprentice being paid or otherwise compensation for the work based component.~~
~~Biodiversity~~	~~The variability among living organisms from all sources including, inter alia, terrestrial, freshwater, marine and other aquatic ecosystems and the ecological complexes of which they are part.~~
Biodiversity sensitive Area	Biodiversity sensitive areas include: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139.
Business Conduct	The following matters are collectively referred to as 'business conduct or business conduct matters': (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices, especially with regard to late payment to small and medium-sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities.
Child Labour	Work that deprives children of their childhood, potential, and dignity and harms their physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and/or interferes with their schooling (by preventing them from the opportunity to attend school).

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Annex 2: Mark-up from VSME ED

Defined term	Definition
Collective bargaining	All negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more trade unions or, in their absence, the representatives of the workers duly elected and authorised by them in accordance with national laws and regulations, on the other, for: i) determining working conditions and terms of employment; and/or ii) regulating relations between employers and workers; and/or regulating relations between employers or their organisations and a workers' organisation or workers' organisations.
Corruption	Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.
Consumers	Individuals who acquire, consume or use goods and services for personal use, either for themselves or for others, and not for resale, commercial or trade, business, craft or profession purposes.
Classified information	EU classified information as defined in Council Decision of 23 September 2013 on the security rules for protecting EU classified information (2013/488/EU) or classified by one of the Member States and marked as per Appendix B of that Council decision. EU classified information means any information designated by a EU security classification, of which the unauthorised disclosure could cause varying degrees of prejudice to the interests of the European Union or of one or more of the Member States. Classified information may be classified according to four levels: top secret, secret, confidential, restricted (based on the definition from the Council Decision).
Circular economy principles	The European circular economy principles are usability; reusability; repairability; disassembly; remanufacturing or refurbishment; recycling; recirculation by the biological cycle; other potential optimisation of product and material use.
Climate change adaptation	The process of adjustment to actual and expected climate change and its impacts.
Climate-related physical risks	Risks resulting from climate change that can be event-driven (acute) or from longer-term shifts (chronic) in climate patterns. Acute physical risks arise from particular hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from longer-term changes in the climate, such as temperature changes, and their effects on rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
Direct GHG emissions (Scope 1)	Direct GHG emissions from sources that are owned or controlled by the undertaking.
Discrimination	Discrimination can occur directly or indirectly. Direct discrimination occurs when an individual is treated less favourably by comparison to how

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Annex 2: Mark-up from VSME ED

Defined term	Definition
	others, who are in a similar situation. Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics.
Employee	An individual who is in an employment relationship with the undertaking according to national law or practice.
End-users	Individuals who ultimately use or are intended to ultimately use a particular product or service.
~~Family related leave~~Forced Labour	~~Family related leave include maternity leave, paternity leave, parental leave, and carers' leave that is available under national law or collective agreements. For the purpose of this Standard, these concepts are defined as:~~ ~~(a) maternity leave (also called pregnancy leave): employment protected leave of absence for employed women directly around the time of childbirth (or, in some countries, adoption);~~ ~~(b) paternity leave: leave from work for fathers or, where and in so far as recognised by national law, for equivalent second parents, on the occasion of the birth or adoption of a child for the purposes of providing care;~~ ~~(c) parental leave: leave from work for parents on the grounds of the birth or adoption of a child to take care of that child, as defined by each Member State;~~ ~~(d) carers' leave from work: leave for workers to provide personal care or support to a relative, or a person who lives in the same household, in need of significant care or support for a serious medical reason, as defined by each Member State.~~All work or service which is exacted from any person under the threat of penalty and for which the person has not offered himself or herself voluntarily according to the ILO Forced Labour Convention, 1930 (No.29). The term encompasses all situations in which persons are coerced by any means to perform work.
Grievance mechanism	Any routinized, state-based or non-state-based, judicial or non-judicial processes through which stakeholders can raise grievances and seek remedy. Examples of state-based judicial and non-judicial grievance mechanisms include courts, labour tribunals, national human rights institutions, National Contact Points under the OECD Guidelines for Multinational Enterprises, ombudsperson offices, consumer protection agencies, regulatory oversight bodies, and government-run complaints offices. Non-state-based grievance mechanisms include those administered by the undertaking, either alone or together with stakeholders, such as operational-level grievance mechanisms and collective bargaining, including the mechanisms established by collective bargaining. They also include mechanisms administered by industry associations, international organisations, civil society organisations, or multi-stakeholder groups. Operational-level grievance mechanisms are administered by the organisation either alone or in collaboration with other parties and are directly accessible by the organisation's stakeholders. They allow for grievances to be identified and addressed early and directly, thereby preventing both harm and grievances from escalating. They also provide important feedback on the effectiveness of the organisation's due diligence from those who are directly affected. According to UN Guiding Principle 31, effective grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning. In addition to these criteria, effective operational-level grievance mechanisms are also based on engagement and dialogue. It can be more difficult for the organisation to assess the effectiveness of

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Annex 2: Mark-up from VSME ED

Defined term	Definition
	grievance mechanisms that it participates in compared to those it has established itself.
Greenhouse Gases (GHG)	For the purposes of this Standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO2); methane (CH4); nitrous oxide (N2O); Nitrogen trifluoride (NF3); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF6).
Governance	The governance is the system of rules, practices and processes by which a company is directed and controlled.
Gross greenhouse gas (GHG) emissions	Gross greenhouse gas (GHG) emissions are total GHG emissions ~~before~~ released by the undertaking into the atmosphere, without considering any deductions for carbon removals or ~~any~~ other adjustments ~~are made~~.
Hazardous waste	Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste.
Human trafficking	The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
Incident	A legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms
Indirect GHG emissions (Scope 2)	Indirect emissions are a consequence of the operations of the undertaking but occur at sources owned or controlled by another company. Scope 2 GHG emissions are indirect emissions from the generation of purchased or acquired electricity, steam and heat, or cooling consumed by the undertaking.

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Annex 2: Mark-up from VSME ED

Defined term	Definition
Impact	Impact refers to the effect an organization has or could have on the economy, environment, and people, including effects on their human rights, as a result of the organization's activities or business relationships. The impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, direct or indirect, and reversible or irreversible. These impacts indicate the organization's contribution, negative or positive, to sustainable development. The impacts on the economy, environment, and people are interrelated. The organization's impacts on the environment refer to the impacts on living organisms and non-living elements, including air, land, water, and ecosystems. An organization can have an impact on the environment through, for example, its use of energy, land, water, and other natural resources. The organization's impacts on people refer to the impacts on individuals and groups, such as communities, vulnerable groups, or society. This includes the impacts the organization has on people's human rights. An organization can have an impact on people through, for example, its employment practices (e.g., the wages it pays to employees), its supply chain (e.g., the working conditions of workers of suppliers), and its products and services (e.g., their safety or accessibility).
Land-use (change)	The human use of a specific area for a certain purpose (such as residential; agriculture; recreation; industrial, etc.). Influenced by land cover (grass, asphalt, trees, bare ground, water, etc). Land-use change refers to a change in the use or management of land by humans, which may lead to a change in land cover.
Location-based Scope 2 emissions	Emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company, calculated using the location-based 'allocating' method, which allocates generator emissions to end-users. They reflect the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).
Nature-oriented area	A "nature-oriented area" is an area dedicated primarily to nature preservation or restoration. They can be located on-site and include elements like roof, façade, water drainages -designed, to promote biodiversity. Nature-oriented areas can also be located outside the organisation site provided that the area is owned or (co-)managed by the organisation and is primarily dedicated to promoting biodiversity. (Adapted from EMAS regulation)
Near (Biodiversity Sensitive Area)	Near, in the context of B5 – Biodiversity, shall refer to an area that is (partially) overlapping or adjacent to a biodiversity sensitive area.
Own workforce/own workers	Employees who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78).
Pay	The ordinary basic or minimum wage or salary and any other

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Defined term	Definition
	remuneration, whether in cash or in kind which the worker receives directly or indirectly ('complementary or variable components'), in respect of his/her employment from his/her employer. 'Pay level' means gross annual pay and the corresponding gross hourly pay. 'Median pay level' means the pay of the employee that would have half of the employees earn more and half less than they do
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a ~~material~~ sustainability issues~~matter~~. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is implemented through actions or action plans. For example, undertakings with less resources may have few (or no) policies formalised in written documents, but this does not necessarily mean they do not have policies. If the undertaking has not yet formalised a policy but has implemented actions or defined targets through which the undertaking seeks to address ~~material~~ sustainability ~~topics and subtopics~~issues, it shall~~may~~ disclose them.
Radioactive waste	Any radioactive material in gaseous, liquid, or solid form, for which no further use is foreseen, as per Article 3(7) of Council Directive 2011/70/Euratom[20].
Recordable work-related accident / Recordable work-related injury or ill health	A work-related accident is an event that leads to physical or mental harm therefore to injury or ill health. It happens whilst engaged in an occupational activity or during the time spent at work. Recordable means diagnosed by a physician or other licensed health care professionals. Work-related injury or ill health ~~that results~~can result in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid~~,~~ or loss of consciousness~~; or significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. Recordable means diagnosed by a physician or other licensed health care professionals.~~. Injuries that do not require medical treatment beyond first aid are generally not recordable.
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations
Renewable Energy	Energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas[21].

[20] Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.

[21] Article 2(1) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources Directive (EU) 2018/2001 of the European Parliament and

Annex 2: Mark-up from VSME ED

Defined term	Definition
Sealed area	A sealed area means any area where the original soil has been covered (such as roads) making it impermeable. This non-permeability can create environmental impacts. (Source: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R1221-20230712)
Sensitive information	Sensitive information as defined in Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund. Sensitive information means information and data, including classified information, that is to be protected from unauthorised access or disclosure because of obligations laid down in Union or national law or in order to safeguard the privacy or security of a natural or legal person.
Site	The location of one or more physical installations. If there is more than one physical installation from the same or different owners or operators and certain infrastructure and facilities are shared, the entire area where the physical installation are located may constitute a site.
Targets	Measurable, outcome-oriented and time-bound goals that the SME aims to achieve in relation to ~~material~~ sustainability ~~topics and subtopics~~issues. They may be set voluntarily by the SME or derive from legal requirements on the undertaking.
Time horizons	When preparing its sustainability report, the undertaking shall adopt the following time horizons: (a) for the short-term time horizon, one year; (b) for the medium-term time horizon, from two to five years; and (c) for the long-term time horizon, more than five years.
Training	Initiatives put in place by the undertaking aimed at the maintenance and/or improvement of skills and knowledge of its own workers. It can include different methodologies, such as on-site training, and online training.
Value Chain	The full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. A value chain encompasses the activities, resources and relationships the undertaking uses and relies on to create its products or services from conception to delivery, consumption and end-of- life. Relevant activities, resources and relationships include: a) those in the undertaking's own operations, such as human resources; b) those along its supply, marketing and distribution channels, such as materials and service sourcing and product and service sale and delivery; and c) the financing, geographical, geopolitical and regulatory environments in which the undertaking operates. Value chain includes actors upstream and downstream from the undertaking. Actors upstream from the undertaking (e.g., suppliers) provide products or services that are used in the

of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).

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Defined term	Definition
	development of the undertaking's products or services. Entities downstream from the undertaking (e.g., distributors, customers) receive products or services from the undertaking.
Wage	Gross wage, excluding variable components such as overtime and incentive pay, and excluding allowances unless they are guaranteed
Water consumption	The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period.
Water withdrawal	The sum of all water drawn into the boundaries of the undertaking from all sources for any use over the course of the reporting period.
~~Work life balance~~	~~Satisfactory state of equilibrium between an individual's work and private life. Work life balance in a broader sense encompasses not only the balance between work and private life given family or care responsibilities, but also time allocation between time spent at work and in private life beyond family responsibilities.~~
Worker in the value chain	An individual performing work in the value chain of the undertaking, regardless of the existence or nature of any contractual relationship with the undertaking. In the ESRS, the scope of workers in the value chain include all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking. This includes impacts that are connected to the undertaking's own operations, and value chain, including through its products or services, as well as through its business relationships. This includes all workers who are not in the scope of 'Own Workforce' ('Own Workforce' includes people who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in employment activities (NACE Code N78)

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Appendix B: List of possible sustainability ~~matters~~issues

The appendix below is an integral part of this ~~[draft]~~ Standard. ~~The compilation of sustainability topics along with their related subtopics and sub-subtopics shall be used as a basis for determining what material matters are to be reported.~~ and provides a list of possible sustainability issues.

~~Sustainability matters~~issue ~~covered in [draft] topical ESRS~~		
Topic	**Sustainability ~~matter~~issue: Sub-topic**	**Sustainability ~~matter~~issue: sub-sub topic**
Climate change	– Climate change adaptation – Climate change mitigation – Energy	
Pollution	– Pollution of air – Pollution of water – Pollution of soil – Pollution of living organisms and food resources – Substances of concern – Substances of very high concern – Microplastics	
Water and marine resources	– Water – Marine resources	– Water consumption – Water withdrawals – Water discharges – Water discharges in the oceans – Extraction and use of marine resources
Biodiversity and ecosystems	– Direct impact drivers of biodiversity loss	– Climate Change – Land-use change, fresh water-use change and sea-use change – Direct exploitation – Invasive alien species – Pollution – Others
	– Impacts on the state of species	– Examples: – Species population size – Species global extinction risk
	– Impacts on the extent and condition of ecosystems	– Examples: – Land degradation – Desertification – Soil sealing
	– Impacts and dependencies on ecosystem services	
Circular economy	– Resources inflows, including resource use – Resource outflows related to products and services – Waste	
Own workforce	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue

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~~Sustainability mattersissue covered in [draft] topical ESRS~~		
Topic	**Sustainability ~~matter~~issue: Sub-topic**	**Sustainability ~~matter~~issue: sub-sub topic**
		– Freedom of association, the existence of works councils and the information, consultation and participation rights of workers – Collective bargaining, including rate of workers covered by collective agreements – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – Employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Privacy
Workers in the value chain	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue – Freedom of association, including the existence of work councils – Collective bargaining – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – The employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Water and sanitation – Privacy
Affected communities	– Communities' economic, social and cultural rights	– Adequate housing – Adequate food – Water and sanitation – Land-related impacts – Security-related impacts

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~~Sustainability mattersissue covered in [draft] topical ESRS~~		
Topic	**Sustainability matterissue: Sub-topic**	**Sustainability matterissue: sub-sub topic**
	– Communities' civil and political rights	– Freedom of expression – Freedom of assembly – Impacts on human rights defenders
	– Rights of indigenous communities	– Free, prior and informed consent – Self-determination – Cultural rights
Consumers and end-users	– Information-related impacts for consumers and/or end-users	– Privacy – Freedom of expression – Access to (quality) information
	– Personal safety of consumers and/or end-users	– Health and safety – Security of a person – Protection of children
	– Social inclusion of consumers and/or end-users	– Non-discrimination – Access to products and services – Responsible marketing practices
Business conduct	– Corporate culture – Protection of whistle-blowers – Animal welfare – Political engagement – Management of relationships with suppliers including payment practices	
	– Corruption and bribery	– Prevention and detection including training – Incidents

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Appendix C~~–~~: ~~dedicated to~~Additional~~Background information explanatory information for~~ financial market participants that are users of the information produced using this ~~[draft]~~ Standard (reconciliation with other EU Regulations)

~~126.~~245. This appendix is relevant for users of the sustainability report. The table below illustrates the Sustainable Finance Datapoints that are present in different modules of this Standard that satisfy the requests of multiple user types (banks, investors, large undertakings).

~~127.~~246. The column 'DR number and Title' identifies the disclosures present in the different modules (i.e. Basic Module, ~~Narrative PAT Module,~~ and ~~Business Partners~~Comprehensive Module) that are Sustainable Finance datapoints. The column SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation illustrates how these disclosures relate to these regulations that are relevant for users of the sustainability report (banks, other investors).

Topic: Environment / Social / Governance	DR number and Title	SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation
Basic Module		
~~Cross Cutting~~General information	**B1 – Basis for preparation** The undertaking shall disclose: vii. geolocation of sites owned, leased or managed.	**EBA Pillar 3**[22]
Environment	**B3 – Energy and greenhouse gas emissions** The undertaking shall disclose its total energy consumption in MWh, with a breakdown as per the table below, if it can obtain the necessary information to provide such a breakdown:	**SFDR**[23]

	Renewable	Non-renewable	Total
Electricity (as reflected in utility billings)			
Fuels			

[22] This disclosure requirement is consistent with the requirements included in Commission Implementing Regulation (EU) 2022/2453 - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.

[23] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #5 in Table 1 of Annex I ("Share of non-renewable energy consumption and production").

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Environment	**B5 – Biodiversity** The undertaking shall disclose the number and area (in hectares) of sites that it owns, that it has leased or that it manages, that are located in or near biodiversity sensitive areas.	**SFDR**[29]
Environment	**B7 – Resource use, circular economy and waste management** The undertaking shall disclose: (b) the total annual generation of waste broken down by type (non-hazardous and hazardous);	**SFDR**[30]
Social	**B9 – Workforce – Health and safety** The undertaking shall disclose the following information regarding its ***employees***: (a) the number and rate of ***recordable work-related*** accidents; and (b) the number of fatalities as a result of work-related injuries and work-related ill health.	**SFDR**[31] **Benchmark**[32]
Social	**B10 – Workforce – Remuneration, collective bargaining and training** The undertaking shall disclose: (a) the percentage gap in ***pay*** between its female and male ***employees***. The undertaking may omit this disclosure when its headcount is below 150 employees noting that this threshold will be reduced to 100 employees from 7 June 2031;	**SFDR**[33]
Governance	**B11 – Convictions and fines for corruption and bribery**	**Benchmark**[34]

[29] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #7 in Table 1 of Annex I ("Activities negatively affecting biodiversity-sensitive areas")

[30] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #9 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Hazardous waste and radioactive waste ratio").

[31] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088, as reflecting an additional indicator related to principal adverse impacts as set out by indicator #2 in Table 3 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments ("Rate of accidents")

[32] Benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Weighted average ratio of accidents, injuries, fatalities" in section 1 and 2 of Annex 2.

[33] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #12 in Table 1 of Annex I ("Unadjusted gender pay gap") and (EU) 2020/1816 Benchmark Regulation (EU), indicator "Weighted average gender pay gap" in section 1 and 2 of Annex II.

[34] Benchmark Regulation (EU) 2020/1816, indicator "Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws" in section 1 and 2 of Annex II.

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	In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.	
Comprehensive Module		
Environment	**Consideration when reporting on GHG emissions under B3 (Basic Module)** When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under B3 – Energy and greenhouse gas emissions.	**SFDR**[35] **Benchmark**[36]
Environment	**C3 – GHG emissions reduction target** If the undertaking has established GHG emission reduction ***targets***, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 50 to 53 above and depending on the nature of its activities, the undertaking shall also provide targets for significant Scope 3 emissions. In particular, it shall provide: (a) the target year and target year value; (b) the base year and base year value; (c) the units used for ***targets***; (d) the share of Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns; and (e) a list of main actions it seeks to implement to achieve its ***targets***.	**SFDR**[38] **Benchmark**[39]

[35] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint")

[36] Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[38] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 (SFDR) because it is derived from an additional indicator related to principal adverse impacts as set out by indicator #4 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Investments in companies without carbon emission reduction initiatives")

[39]This information is aligned with the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 6.

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	In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.	
Comprehensive Module		
Environment	**Consideration when reporting on GHG emissions under B3 (Basic Module)** When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under B3 – Energy and greenhouse gas emissions.	**SFDR**[35] **Benchmark**[36]
Environment	**C3 – GHG emissions reduction target** If the undertaking has established GHG emission reduction ***targets***, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 50 to 53 above and depending on the nature of its activities, the undertaking shall also provide targets for significant Scope 3 emissions. In particular, it shall provide: (a) the target year and target year value; (b) the base year and base year value; (c) the units used for ***targets***; (d) the share of Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns; and (e) a list of main actions it seeks to implement to achieve its ***targets***.	**SFDR**[38] **Benchmark**[39]

[35] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint")

[36] Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[38] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 (SFDR) because it is derived from an additional indicator related to principal adverse impacts as set out by indicator #4 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Investments in companies without carbon emission reduction initiatives")

[39]This information is aligned with the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 6.

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	If the undertaking that operates in high climate impact sectors[37] has adopted a transition plan for climate change mitigation, it may provide information about it, including an explanation of how it is contributing to reduce GHG emissions. In case the undertaking operates in high-climate impact sectors and does not have a transition plan for climate change mitigation in place, it shall indicate whether and, if so, when it will adopt such a transition plan.	**EBA Pillar 3**[40] **Benchmark**[41]
Environment	**C4 – Climate risks** If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall: (a) briefly describe such climate-related hazards and climate-related transition events; (b) disclose how it has assessed the exposure and sensitivity of its assets, activities and ***value chain*** to these hazards and transition events; (c) disclose the ***time horizons*** of any climate-related hazards and transition events identified; and	**Benchmark**[42] **EBA Pillar 3**[43]

[37] High climate impact sectors are those listed in NACE Sections A to H and Section L as defined in Annex I to Regulation (EC) No 1893/2006.

[40] This information is aligned with Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics

[41] This information is aligned with the Regulation (EU) 2021/1119 of the European Parliament and of the Council (EU Climate Law), Article 2 (1); and with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 2.

[42] Benchmark Regulation (EU) 2020/1816 Annex II: Environmental factors to be considered by underlying assets of the benchmark.

[43] EBA Pillar 3: ITS - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk and EBA Pillar 3: ITS - Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral.

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	(d) disclose whether it has undertaken ***climate change adaptation*** actions for any climate-related hazards and transition events. The undertaking may disclose the potential adverse effects of climate risks that may affect its financial performance or business operations in the short-, medium- or long-term, indicating whether it assesses the risks to be high, medium, low.	
Social	**C6 – Additional own workforce metric - Human rights policies and processes** The undertaking shall disclose an answer to the following questions. (a) Does the undertaking have a code of conduct or human rights ***policy*** for its ***own workforce***? (YES/NO) (b) If yes, does this cover: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/NO); iv. discrimination (YES/NO); v. accident prevention (YES/NO); or vi. other? (YES/NO – if yes, specify). (c) Does the undertaking have a complaints-handling mechanism for its own workforce? (YES/ NO)	**Benchmark**[44] **SFDR**[45]
Social	**C7 – Severe human rights incidents**	**SFDR**[46] **Benchmark**[47]

[44] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Exposure of the benchmark portfolio to companies without due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8" in section 1 and 2 of Annex II.

[45] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #11 in Table I of Annex I ("Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises") and by indicator #5 in Table III of Annex I ("Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters") and by indicator #9 in Table III of Annex I ("Share of investments in entities without a human rights policy") of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments.

[46] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory and additional indicator related to principal adverse impacts as set out by indicator #10 in Table I of Annex I and by indicator #14 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Violations of UNGC principles and OECD Guidelines for Multinational Enterprises" and "Number of identified cases of severe human rights issues and incidents")

[47] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Number of benchmark constituents subject to social violations

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	The undertaking shall disclose an answer to the following questions: (a) Does the undertaking have confirmed incidents in its ***own workforce*** related to: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/ NO); iv. discrimination (YES/ NO); or v. other? (YES/NO – if yes, specify). (b) If yes, the undertaking may describe the ***actions*** being taken to address the ***incidents*** described above. (c) Is the undertaking aware of any confirmed ***incidents*** involving ***workers in the value chain***, ***affected communities***, ***consumers*** and ***end-users***? If yes, specify.	
Governance	**C8 – Revenues from certain sectors and exclusion from EU reference benchmarks** If the undertaking is active in one or more of the following sectors, it shall disclose its related revenues in the sector(s): (a) controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons);	**SFDR**[48] **Benchmark**[49]
	(b) the cultivation and production of tobacco;	**EBA Pillar 3**[50] **Benchmark**[51]
	(c) fossil fuel (coal, oil and gas) sector (i.e. the undertaking derives revenues from exploration,	**SFDR**[52]

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(absolute number and relative divided by all benchmark constituents), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law" in section 1 and 2 of Annex II.

[48] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #14 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)").

[49] Benchmark Regulation (EU) 2020/1818 Article 12(1): "Administrators of EU-Paris aligned Benchmarks shall exclude all of the following companies from those benchmarks: companies involved in any activities related to controversial weapons; " and Benchmark Regulation (EU) 2020/1816 Annex II: Weighted average percentage of benchmark constituents in the controversial weapons sector."

[50] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in the manufacturing of tobacco products excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[51] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1818 as set out by paragraph b) of article 12.1. and Benchmark Regulation (EU) 2020/1816 Annex II: "Weighted average percentage of benchmark constituents in the tobacco sector."

[52] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator

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	mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council17), including a disaggregation of revenues derived from coal, from oil and from gas); or	**EBA Pillar 3**[53] **Benchmark**[54]
	(d) chemicals production, if the undertaking is a manufacturer of pesticides and other agrochemical products.	**SFDR**[55] **EBA Pillar 3**[56]
	The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement as described in paragraph 241 of the guidance.	**EBA Pillar 3**[57] **Benchmark**[58]
Governance	**C9 – Gender diversity ratio in governance body** If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	**SFDR**[59] **Benchmark**[60]

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#4 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to companies active in the fossil fuel sector")

[53] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in Mining and quarrying excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[54] Benchmark Regulation (EU) 2020/1818 Article 12(1).

[55] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #9 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Investments in companies producing chemicals").

[56] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in Mining and quarrying excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[57] This disclosure requirement is consistent with the requirements in Commission Implementing Regulation (EU) 2022/2453 - template 1 climate change transition risk.

[58] This disclosure requirement is aligned with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 12.1.

[59] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #13 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to disclosures rules on sustainable investments ("Board gender diversity")

[60] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as set out by indicator "Weighted average ratio of female to male board members" in section 1 and 2 of Annex II.

Annex 3: List of public meetings held on the VSME

- EFRAG SR TEG Meeting 17 November 2022 – EFRAG on the workstreams on SMEs.
- EFRAG SRB Meeting 14 December 2022 - EFRAG on SMEs standards approach and methodology.
- EFRAG SRB Meeting 7 February 2023 - EFRAG on the building blocks.
- EFRAG SR TEG Meeting 19 June 2023 - EFRAG on building blocks.
- EFRAG SRB Meeting 28 June 2023 - EFRAG on the role of VSME, entities in scope, building blocks approach and joint consultation of LSME and VSME
- EFRAG SR TEG Meeting 13 July 2023 – EFRAG on LSME and VSME.
- EFRAG SRB Meeting 13 September 2023 – EFRAG on LSME and VSME.
- EFRAG SR TEG Meeting 20 September 2023 – EFRAG on the feedback from the internal consultation on VSME V1.1, focus on cross cutting and Environment.
- EFRAG SRB Meeting 22 September 2023 – EFRAG on verbal update on SR TEG discussions.
- EFRAG SR TEG Meeting 29 September 2023 – EFRAG on the feedback from the internal consultation on VSME V1.1, focus on Social and Governance metrics.
- EFRAG SR TEG Meeting 2 October 2023 – EFRAG on the simplified language approach to VSME cross cutting section (V2).
- EFRAG SRB Meeting 24 October 2023 – EFRAG feedback on the simplified language approach to VSME (V3).
- EFRAG SR TEG Meeting 26 October 2023 – EFRAG detailed feedback and last red flags on VSME (V3).
- EFRAG SR TEG Meeting 8 November 2023 – EFRAG on VSME ED approval.
- EFRAG SRB Meeting 29 November 2023 – EFRAG on VSME ED approval.

Meetings held after the public consultation:

- EFRAG SRB meeting 10 July 2024 | EFRAG on the strategic orientations of the VSME after public consultation.
- EFRAG SR TEG meeting 16 July 2024 | EFRAG on the strategic orientations of the VSME after public consultation.
- EFRAG SRB meeting 17 July 2024 | EFRAG on the strategic orientations of the VSME after public consultation.
- EFRAG SR TEG meeting 12 September 2024 | EFRAG on the revised VSME after public consultation.
- EFRAG SR TEG physical meeting 19 September 2024 | EFRAG on the reviewal continuation of the revised VSME after public consultation.
- EFRAG SR TEG Webcast Meeting - 26 September 2024 | EFRAG on the reviewal continuation of the revised VSME after public consultation.
- EFRAG SR TEG meeting 07 October 2024 | EFRAG on the reviewal continuation of the revised VSME after public consultation.
- EFRAG SR TEG meeting 10 October 2024 | EFRAG on the approval initiation of the revised VSME after public consultation.
- EFRAG SRB meeting 16 October 2024 | EFRAG update on the revised VSME after public consultation.
- EFRAG SR TEG meeting 17 October 2024 | EFRAG on the reviewal continuation of the revised VSME after public consultation.
- EFRAG SR TEG meeting 22 October 2024 | EFRAG on VSME approval.
- EFRAG SRB meeting 30 October 2024 | EFRAG on VSME approval initiation.
- EFRAG SRB meeting 13 November 2024 | EFRAG on VSME approval.

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Annex 4: List of internal meetings held on the VSME

- 1st EWG meeting (19 December 2022): SMEs workstream and building blocks approach, LSME and VSME approach and prioritization of work.
- SR TEG (19 January 2023): discussion on VSME, approach taken by ex PTF Cluster 8 and the C8 proposal on voluntary standard for SMEs.
- 2nd EWG meeting (19 January 2023): LSME and VSME.
- SRB meeting (27 January 2023) on approach to LSME and VSME as two separate standards.
- 3rd EWG meeting (9 February 2023): discussion on LSME and VSME Communities questionnaires and LSME working papers.
- 4th EWG meeting (8 March 2023): Discussion on VSME Community feedback and LSME working papers.
- European Issuers Smaller issuers committee (9 May 2023).
- EFRAG SR TEG Meeting (5 September 2023): EFRAG on Vienna Initiative Questionnaire Alignment with VSME V1.1.
- 5th EWG meeting (27 October 2023): discussion on VSME V3.
- Meeting with DG Grow (8 July 2024)
- Internal Meeting with Platform on Sustainable Finance (9 July 2024)
- Meeting with MEF and DG FISMA (15 July 2024)
- Meeting with DG FISMA and DG Grow (3 October 2024)

List of field test workshop events (11 events in total)

- Introductory workshop with VSME field test preparers (9 February 2024)
- VSME User field test introductory meeting (1 March 2024)
- Micro preparers option A (6 May 2024)
- Micro & Small preparers option B (6 May 2024)
- Platforms and rating agencies (7 May 2024)
- Medium preparers option B (8 May 2024)
- Medium preparers option A (13 May 2024)
- Small preparers option A (14 May 2024)
- Users: banks, user associations and other proxies for users (15 May 2024)
- Accounting firms, auditing firms, and reporting tools workshop (16 May 2024)
- Consulting services and others workshop (21 May 2024)

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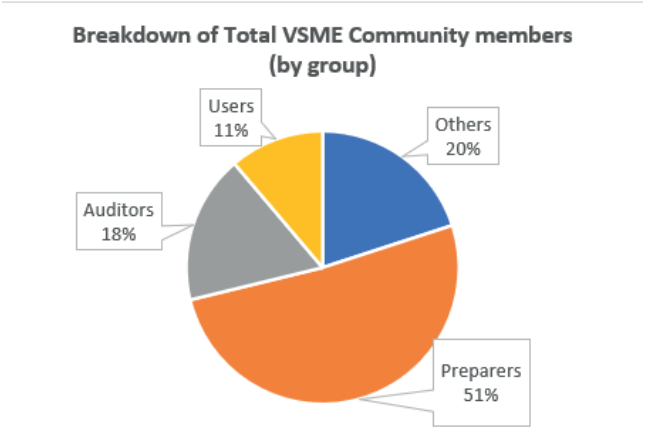
Annex 5: List of outreach meetings

- VSME Community workshop internal + final public session (31 January 2023): presentation of the outcome of the questionnaire sent to the VSME Community members and additional questions regarding VSME.
- Meeting with Vienna Initiative (30 August 2023): Gap Analysis between VSME V1.1 and Vienna Initiative Questionnaire
- First Bank workshop (1 September 2023): Feedback on EFRAG VSME V.2
- SME UNITED and EFRAG Secretariat workshop (4 September 2023): Feedback from EFRAG VSME V.2
- 2nd VSME Community workshop internal + final public session (7 September 2023): Feedback on EFRAG VSME V.2
- FBF Questionnaire and EFRAG Secretariat (20 September 2023) on alignment with VSME V.2
- CSR Europe Workshop with EFRAG Secretariat (5 October 2023) on VSME V.2
- Business Europe meeting with EFRAG Secretariat (13 October 2023) on VSME V.2
- Second SME UNITED and EFRAG Secretariat workshop (20 October 2023) on feedback on VSME V3.
- Second Bank Workshop (23 October 2023) on feedback and alignment on VSME V3.
- CPME (French Members of SMEunited) (25 October 2023) on feedback on VSME V3.
- SME Envoys Network (11 January 2024) on VSME
- Introductory meeting with EcoVadis (12 January 2024)
- EFRAG – ILO (29 January 2024) focus on social dimension in LSME and VSME
- EFRAG User Panel meeting (1 February 2024)
- SME Envoys Network (2 February 2024)
- 4th Open-Es meeting (8 February 2024)
- ESMA on ESRS LSME ED and VSME ED (13 February 2024)
- Public consultation outreach event (20 February 2024)
- Open ES Camp event (22 February 2024)
- EcoVadis Meeting on VSME (26 February 2024)
- EIB Climate Coordination Committee – ESRS LSME ED and VSME ED (12 March 2024)
- Open ES follow up meeting (21 March 2024)
- Meeting with the Platform on Sustainable Finance (5 April 2024)
- Confartiginato Imprese meeting: Forum Sostenibilitá (10 April 2024)
- OIBR meeting (11 April 2024) – focus on VSME
- French Ministry of Economy (29 April 2024)
- Impact Europe Outreach Event (13 may 2024) – SMEs with impact: facilitating sustainability reporting.
- OECD outreach event (14 May 2024)
- Banque de France Outreach event (13 May 2024)
- Autorités Françaises (19 June 2024) Focus on the public consultation
- New Zealand Reporting Authority – SME climate related disclosures (19 June 2024)
- External event SAGE (10 September 2024)
- Bank Workshop (16 September 2024) – Focus on additional disclosures requested by banks in public consultation
- SMEunited Workshop (23 September 2024) – Focus on revised VSME after public consultation
- IFASS meeting (25 September 2024) – focus on SME reporting
- CSR Europe Meeting (3 October 2024) EACB LSME and VSME (16 October 2024)
- OECD Annual Conference (4 November 2024) – SME Sustainability Reporting
- Orgalim Biannual Corporate Sustainability Task Force meeting (6 November 2024) - VSME & LSME
- EEN Budapest (6-8 November 2024)

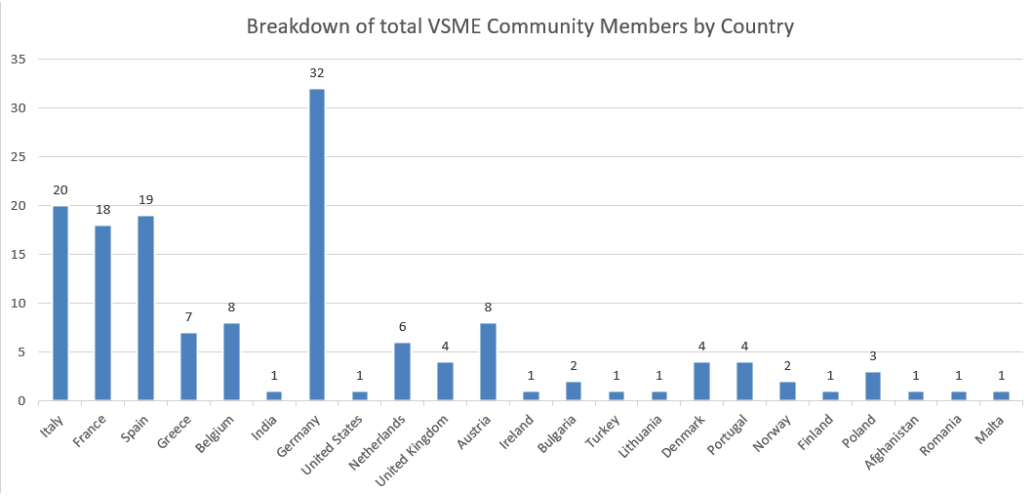
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Annex 6: Breakdown of the VSME community members

1. The EFRAG VSME community provides input to the EFRAG Secretariat and consists of 146 members. These have been broken down by category: auditors, preparers, users and others. The graph below provides a graphical representation of the percentages that these categories represent within the total number of community members.



2. The graph below illustrates the breakdown by country of the total VSME community members.



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Annex 7: Comparison of SFDR, Benchmark Regulation and Pillar 3 datapoints in the VSME and ESRS Set 1

VSME Datapoints	ESRS Set 1 Datapoint	Explanation
Basic Module		
B3 – Energy and greenhouse gas emissions (SFDR and Benchmark) The undertaking shall disclose its total energy consumption in MWh, with a breakdown as per the table below, if it can obtain the necessary information to provide such a breakdown: [TABLE] The undertaking shall disclose its estimated gross greenhouse gas (GHG) emissions in tons of CO2 equivalents (tCO2eq), considering the content of the GHG Protocol Corporate Standard (version 2004), including: (a) The scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and (b) The location-based scope 2 emissions in tCO_2eq (emissions from the generation of purchased energy, such as electricity, heat, steam or cooling). The undertaking shall disclose its GHG intensity calculated by dividing 'gross greenhouse gas (GHG) emissions' disclosed under paragraph 30 by 'turnover (in Euro)' disclosed under paragraph 24 (e) (iv).	ESRS E1-5 35. The undertaking shall provide information on its energy consumption and mix. 37. The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by: (a) total energy consumption from fossil sources;	SAME DEFINITION AS SET 1
	ESRS E1-6 44. The undertaking shall disclose in metric tonnes of CO2eq its: (a) gross Scope 1 GHG emissions; (b) gross Scope 2 GHG emissions; (c) gross Scope 3 GHG emissions; and (d) total GHG emissions. 53. The undertaking shall disclose its GHG emissions intensity (total GHG emissions per net revenue). 54. The disclosure on GHG intensity required by paragraph 53 shall provide the total GHG emissions in metric tonnes of CO2eq	Partially aligned due to the explicit removal of Scope 3 emissions in line with the VSME simplified approach.

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
	(required by paragraph 44 (d)) per net revenue.	
B4 – Pollution of air, water and soil (SFDR) If the undertaking is already required by law or other national regulations to report to competent authorities its emissions of pollutants, or if it voluntarily reports on them according to an Environmental Management System, it shall disclose the pollutants it emits to air, water and soil in its own operations, with the respective amount for each pollutant. If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.	ESRS E2-4 The undertaking shall disclose the amounts of: (a) each pollutant listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council (European Pollutant Release and Transfer Register "E-PRTR Regulation") emitted to air, water and soil, with the exception of emissions of GHGs which are disclosed in accordance with ESRS E1 Climate Change.	SAME DEFINITION AS SET 1
B5 – Biodiversity (SFDR) The undertaking shall disclose the number and area (in hectares) of sites that it owns, has leased, or manages, in or near biodiversity sensitive areas.	ESRS SBM 3 The undertaking shall disclose: a) a list of material sites in its own operations, including sites under its operational control, based on the results of paragraph 17(a). The undertaking shall disclose these locations by: i. specifying the activities negatively affecting biodiversity sensitive areas;	Partially aligned with SET 1
B7 – Resource use, circular economy, and waste management (SFDR Table 1) The undertaking shall disclose: (a) the total annual generation of waste broken down by type (non-hazardous and hazardous); Guidance: When reporting on ***hazardous waste*** according to paragraph 38 (a), the undertaking fulfils the requirements on ***radioactive waste*** of the indicator number 9 Table #1 of Annex 1 of the Sustainable Finance Disclosure	E5 par. 39: The undertaking shall also disclose the total amount of hazardous waste and radioactive waste generated by the undertaking, where radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom.	SAME DEFINITION AS SET 1

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
Regulation (SFDR).[13] This SFDR indicator (ratio between tonnes of radioactive and ***hazardous waste***) can be computed by using the numerator and denominator that the undertaking provides when reporting according to paragraph 38 (a).		
B9 – Workforce – Health and safety (SFDR) The undertaking shall disclose: (a) the number and rate of recordable work-related accidents. (b) the number of fatalities as a result of work-related injuries and work-related ill health;	ESRS S1-14 The disclosure required by paragraph 86 shall include the following information, where applicable broken down between employees and non-employees in the undertaking's own workforce: b) the number of fatalities as a result of work-related injuries and work-related ill health; c) the number and rate of recordable work-related accidents;	SAME DEFINITION AS SET 1
B10 – Workforce – Remuneration, collective bargaining, and training (SFDR) The undertaking shall disclose: (b) the percentage gap in pay between its female and male employees. The undertaking may omit this disclosure when its headcount is below 150 employees noting that this threshold will be reduced to 100 employees from 7 June 2031	ESRS S1-16 The disclosure required by paragraph 95 shall include: (a) the gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees;	SAME DEFINITION AS SET 1
B11 – Convictions and fines for corruption and bribery (Benchmark) In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions and the amount of fines incurred for the violation of anti-corruption and anti-bribery laws.	ESRS G1-4 The undertaking shall disclose: (a) the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws	SAME DEFINITION AS SET 1
Comprehensive Module		
	E1 PAR 34 (b): GHG emission reduction targets	The part of this datapoint that

[13] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
C3 – GHG reduction targets and climate transition (Benchmark) If the undertaking has established GHG emission reduction targets, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 50 to 53 above and if it has set Scope 3 reduction targets, the undertaking shall also provide targets for significant Scope 3 emissions.	shall be disclosed for Scope 1, 2, and 3 GHG emissions, either separately or combined. The undertaking shall specify, in case of combined GHG emission reduction targets, which GHG emission Scopes (1, 2 and/or 3) are covered by the target, the share related to each respective GHG emission Scope and which GHGs are covered. The undertaking shall explain how the consistency of these targets with its GHG inventory boundaries is ensured (as required by Disclosure Requirement E1-6). The GHG emission reduction targets shall be gross targets, meaning that the undertaking shall not include GHG removals, carbon credits or avoided emissions as a means of achieving the GHG emission reduction targets;	in ESRS Delegated Act July 2023 for large undertakings also includes Scope 3 GHG emission reduction targets has been included as part of the entity specific consideration concerning scope 3.
If the undertaking that operates in high climate impact sectors has adopted a transition plan for climate change mitigation, it may provide information about it, including an explanation of how it is contributing to reduce GHG emissions.	E1 par 14: 14. The undertaking shall disclose its transition plan for climate change mitigation. 16. The information required by paragraph 14 shall include: by reference to GHG emission reduction targets (as required by Disclosure Requirement E1-4), an explanation of how the undertaking's targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement;	Partially aligned with Set 1. The transition plan is reserved for SMEs operating in high climate impact sectors.
C4 – Climate Risks If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall: (a) briefly describe such climate-related hazards and climate-related transition events;	E1 par. 64 (a), 66 and 67 c): 64. The undertaking shall disclose its: (a) anticipated financial effects from material physical risks; (b) anticipated financial effects from material transition risks;	The part of this datapoint that in ESRS Delegated Act July 2023 for large undertakings also includes anticipated financial effects from material

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
(b) disclose how it has assessed the exposure and sensitivity of its assets, activities and ***value chain*** to these hazards and transition events; (c) disclose the ***time horizons*** of any climate-related hazards and transition events identified; and (d) disclose whether it has undertaken ***climate change adaptation*** actions for any climate-related hazards and transition events. The undertaking may disclose the potential adverse effects of climate risks, that may affect its financial performance or business operations in the short-, medium- or long-term, indicating whether it assesses the risks to be high, medium, low.	66. The disclosure of anticipated financial effects from material physical risks required by paragraph 64 (a) shall include: (a) the monetary amount and proportion (percentage) of assets at material physical risk over the short-, medium- and long-term before considering climate change adaptation actions; with the monetary amounts of these assets disaggregated by acute and chronic physical risk; (b) the proportion of assets at material physical risk addressed by the climate change adaptation actions; (c) the location of significant assets at material physical risk; and (d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term. 67. The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) shall include: (c) a breakdown of the carrying value of the undertaking's real estate assets by energy efficiency classes;	transition risks has been deleted in line with the simplification applied to the VSME as part of its methodology.
C5 – Additional (general) workforce characteristics If the undertaking employs 50 or more ***employees***, it may disclose the number of those self-employed without personnel who are working exclusively for the undertaking, and temporary workers provided by undertakings primarily engaged in 'employment activities'.	The disclosure required by paragraph 53 shall include: (a) a disclosure of the total number of non-employees in the undertaking's own workforce, i.e., either people with contracts with the undertaking to supply labour ("self-employed people") or people provided by undertakings primarily engaged in "employment activities" (NACE Code N78).	Partially aligned to Set 1

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
C6 – Additional own workforce metric - Human rights policies and processes (SFDR Table 1) The undertaking shall disclose an answer to the following questions. (a) Does the undertaking have a code of conduct or human rights ***policy*** for its ***own workforce***? (YES/NO) (b) If yes, does this cover: i. ***child labour*** (YES/ NO); ii. ***forced labour*** (YES/ NO); iii. ***human trafficking*** (YES/NO); iv. ***discrimination*** (YES/NO); v. ***accident prevention*** (YES/NO); or vi. other? (YES/NO – if yes, specify).	**S1, par. 21:** The undertaking shall disclose whether and how its policies with regard to its own workforce are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.	SAME DEFINITION AS SET 1 Missing "and how"
(c) Does the undertaking have a complaints-handling mechanism for its ***own workforce***? (YES/ NO)	**S1, par. 20:** The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.	SAME DEFINITION AS SET 1
C7 – Severe negative human rights incidents The undertaking shall disclose an answer to the following questions:	**S1 par. 104 a) :** The undertaking shall disclose the following information regarding identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour): (a) the number of severe human rights incidents connected to the	SAME AS SET 1 DEFINITION

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
(a) Does the undertaking have confirmed incidents in its ***own workforce*** related to: i. ***child labour*** (YES/ NO); ii. ***forced labour*** (YES/ NO); iii. ***human trafficking*** (YES/ NO); iv. ***discrimination*** (YES/ NO); or v. other? (YES/NO – if yes, specify). (b) If yes, the undertaking may describe the actions being taken to address the incidents described above. (c) Is the undertaking aware of any confirmed ***incidents*** involving ***workers in the value chain***, ***affected communities***, ***consumers*** and ***end-users***? If yes, specify.	undertaking's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking shall state this. **S2 par. 36:** The undertaking shall also disclose whether severe human rights issues and ***incidents*** connected to its upstream and downstream ***value chain*** have been reported and, if applicable, disclose these **S3 par. 36:** The undertaking shall also disclose whether severe human rights issues and ***incidents*** connected to ***affected communities*** have been reported and, if applicable, disclose these **S4 par. 35:** When preparing this disclosure, the undertaking shall consider whether severe human rights issues and ***incidents*** connected to its ***consumers*** and/or ***end-users*** have been reported and, if applicable, disclose these	
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks (SFDR Table 1 + Benchmark) If the undertaking is active in one or more of the following sectors it shall disclose its related revenues in the sector(s): (a) controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); (b) the cultivation and production of tobacco;	**ESRS 2 par 40:** Where applicable, a statement indicating, together with the related revenues, that the undertaking is active in: i. the fossil fuel (coal, oil and gas) sector, (i.e., it derives revenues from exploration, mining, extraction, production, processing, storage, refining or	The Taxonomy part of this Disclosure was explicitly excluded in the methodological approach from the Comprehensive Module of the VSME.

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
(c) fossil fuel (coal, oil and gas) sector (i.e., the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, oil and gas; or (d) chemicals production, if the undertaking is a manufacturer of pesticides and other agrochemical products.	distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council17), including a disaggregation of revenues derived from coal, from oil and from gas**,** as well as the revenues derived from Taxonomy-aligned economic activities related to fossil gas as required under Article 8(7)(a) of Commission Delegated Regulation 2021/217818; ii. chemicals production, i.e., its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006; iii. controversial weapons(anti-personnel mines, cluster munitions, chemical weapons and biological weapons); and/or the cultivation and production of tobacco	

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VSME Datapoints	ESRS Set 1 Datapoint	Explanation
The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement as described in paragraph 241 of the guidance.	**ESRS E1.1 par. AR5:** When disclosing the information required under paragraph 16 (g), the undertaking shall state whether or not it is excluded from the EU Paris-aligned Benchmarks in accordance with the exclusion criteria stated in Articles 12(1) (d) to (g) (53) and 12(2) of Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Standards Regulation) (54).	Partially Aligned: reference to DNSH not included in the VSME in line with the simplification applied to the VSME as part of its methodology.
C9 – Gender diversity ratio in governance body (SFDR Table 1 and Benchmark) If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	**GOV 1 par 21.** The undertaking shall disclose the following information about the composition and diversity of the members of the undertaking's administrative, management and supervisory bodies: (d) percentage by gender and other aspects of diversity that the undertaking considers. The board's gender diversity shall be calculated as an average ratio of female to male board members.	Simplification in line with the VSME approach.

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Annex 8: Trickle-down and value chain cap

Value chain cap – legal concept

1. Under the provisions of the Corporate Sustainability Responsibility Directive (CSRD), the ESRS Set 1 for large undertakings shall not specify disclosures that would require reporting undertakings to obtain information from small and medium-sized undertakings (SMEs) in their value chain that exceeds the information to be disclosed pursuant to the LSME ESRS (art 29b 4). EFRAG refers to this as the 'value chain cap'. This concept sets a limit to the work of the standard setter in the definition of ESRS.

2. At the date of issuance of the VSME Standard, EFRAG has not finalised its technical advice on LSME ESRS.

3. While the vast majority of the SMEs in the value chain of the undertakings in the scope of ESRS Set 1 are not in scope of LSME, from a legal perspective the standard setting process cannot deviate from the limitation introduced by the legislators in the CSRD (i.e., LSME ESRS, and not Voluntary SME standard-VSME, is setting the legal cap).

How does this relate to VSME?

4. The Q&A issued by the European Commission accompanying the ESRS Delegated Act indicates that some non-listed SMEs, which are not subject to any sustainability reporting requirements under the Accounting Directive (Directive 2013/34/EU) as amended by CSRD may nevertheless receive requests for sustainability information from customers, banks, investors or other stakeholders. *EFRAG is therefore also developing simpler, voluntary standard for use by non-listed SMEs (VSME). VSME intends to enable non-listed SMEs to respond to request for sustainability information in an efficient and proportionate manner, and so facilitate their participation in the transition to a sustainable economy.* In addition, the EC SME Relief Package of September 2023 refers to *VSME as a measure to support SMEs in accessing sustainable finance*. As a result of this mandate, the objective of the VSME is to provide non-listed SMEs with a simple reporting tool to start their sustainability journey and monitor their sustainability performance and to respond to the growing request of sustainability data from business partners (which includes financial institutions) that are triggered either by ESRS Set 1 reporting obligations or to manage their sustainability risks and pledges in the lending and investment portfolios (financial institutions) or in the supply chain (other business partners). The ambition is for VSME to become a common point of reference for lenders, investors and corporate counterparts in value chain when they define their ESG data requests to SMEs. Concretely this means that, based on market acceptance, VSME is expected to de facto limit current multiple ESG data requests that would represent an important cost of preparation for SMEs, by replacing the various, multiple and uncoordinated ESG questionnaires.

How value chain datapoints of ESRS Set 1 are addressed in VSME?

5. During the development of VSME extensive discussions have taken place regarding the determination of the value chain cap and the need for proportionality, under an appropriate compromise between the expectations expressed at one and the same time by SME preparers and by users of SME information (large undertakings, financial institutions, other SMEs). Part of the discussions focused upon the so-called 'trickle down' effect which crystallises a concern related to ESRS Set 1 reporting entities requesting excessive information from SMEs in their value chain.

6. The table below provides a detailed analysis of datapoints in ESRS Set1 that have a value chain dimension (see EFRAG IG -2 - Value Chain Implementation Guidance) with reference to the 'trickle down' effect under two complementary perspectives: Perspective 1: focusing on the potential costs of preparation for SME that is due to data requests due to ESRS reporting from ESRS Set 1 preparers. This perspective looks at what are the corresponding datapoints in VSME (which has to play a role in limiting the costs of preparation for non-listed SMEs) and how proportionate they are. This perspective covers the trickle-down effect and takes account of the Set 1 provisions and guidance regarding the preparation of value chain related information (in particular in relation to the collection of data and the use of secondary data such as proxies, statistics and estimates). Perspective 2: focusing on the correspondence between value chain datapoints in ESRS Set 1 and VSME, this perspective looks at whether and to what extent there could be potential (additional) trickle-down effect on SMEs that would derive from data not covered in VSME (under one of the two modules for VSME). As a reminder, the guiding principle in developing VSME has been to simplify as much as possible the content, while maintaining the datapoints that are necessary to meet the users' needs (i.e. the users of the VSME reports). It must also be borne in mind that VSME has been drafted under a sector-agnostic approach. Specific sectorial perspectives, as well as supply chain management policies or labels or data platforms developed by certain groups of undertakings (referred to below as « specific arrangements ») may result in additional data requests, which go beyond the scope of a VSME sector agnostic standard. These are due primarily to managerial needs and do not derive from ESRS Set 1 reporting obligations, in isolation from other considerations such as business or sustainability due diligence processes. The table on the next page illustrates the specific users' needs that justify the respective datapoints in VSME[14].

7. The analysis presented in this section includes all the value chain disclosures in ESRS Set 1, irrespective of the fact that in many circumstances they are not expected to trigger direct data requests.

Detailed explanation of the conclusions on the value chain cap for both VSME under both perspectives

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
1. **Strategy, business model**	***Conclusion:*** **no undue effect expected from ESRS reporting[15]** • Perspective 1: since Set 1 preparers will generally use sectoral data instead of collecting direct data • Perspective 2: since covered by VSME disclosures
	Disclosures in VSME: **Basic and Comprehensive Module** • Basic Module B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

[14] For financial market participants, an additional information need arises in relation to the obligations stemming from Article 8 Taxonomy Disclosure (Regulation 2020/852). Such disclosure is limited to own operations and does not extend to suppliers and value chain. Undertakings in scope of the CSRD are also obliged to prepare their own Article 8 Disclosure and will include it in their ESRS Sustainability statement (both for Set 1 and LSME preparers). The requirement to prepare such disclosure stems from Regulation 2020/852 and not from ESRS in isolation. Non-listed SMEs are excluded from the scope of the Regulation 2020/852. VSME does not include this disclosure, as on the basis of feedback received so far, this disclosure is too complex for a general (sector agnostic) data set.

[15] The same is also true of SBM-1 requiring a description of the undertaking's value chain and reflected as a separate row of the value chain map in the EFRAG IG 2 Value Chain_final.pdf.(EFRAG IG 2: VCIG)

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
and value chain (SBM-1) **Material impacts and risks and their interaction with strategy and business model (SBM-3)** **Processes to identify and assess material impacts and risks (IRO-1)**	• Comprehensive Module C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy • Comprehensive Module C1 – Strategy: business model and sustainability related initiatives
	Users' needs To the extent that the policies, practices and future initiatives do involve value chain counterparts, these disclosures may cover the value chain. This reflects the need to align the definition of 'impacts' with that in ESRS Set 1 as this definition 1 also covers value chain. This then avoids additional data requests outside the VSME.
	Perspective 1 The materiality assessment regarding on the upstream value chain may be validly conducted by large undertakings without direct information from specific SME suppliers. Set 1 undertakings will typically conduct the assessment using average regional or sector data to characterise the areas of potential impacts and risks associated with their value chain. Therefore, these disclosures are not expected to result in significant trickle-down effect on SMEs separately from business or sustainability due diligence processes. ***Perspective 2*** VSME does not include materiality assessment as considered too complex for non-listed SMEs. Instead, the "if applicable" principle is used.
2. **General approach to Policies, Actions and Targets (PAT)**	***Conclusion:*** no undue effect on SMEs expected from ESRS reporting ***Perspective 1***: effects on SME may be due to specific arrangements, if any ***Perspective 2***: since appropriate VSME disclosures exist to cover the corresponding information
	Disclosures in VSME: • Basic Module B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy • Comprehensive Module C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy
	Perspective 1 The undertaking's reporting includes upstream and/or downstream value chain information to the extent that those policies and actions involve actors in the value chain. The collection of value chain data from SMEs is due primarily to business reasons and not to ESRS Set 1 reporting (if there are no PAT, no disclosure applies). In fact, the undertaking is expected to leverage information collected for business purposes (implementation of policies and actions, setting and monitoring targets). ESRS reporting may benefit from the value chain information collected for business reasons (i.e., report to the extent that value chain is covered in the PAT), but ESRS reporting is not the cause of the trickle-down or additional preparatory costs to SMEs. When the undertaking that prepares its sustainability statement under ESRS Set 1 and it has no PAT to report for a given material matter, it simply states this fact. ***Perspective 2***

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
	VSME has simplified semi-narrative requirements for practices, policies and future initiatives (former PAT) that pursue a reporting objective consistent with the one in Set 1, as the ones described above. Set 1 undertaking are expected to leverage specific arrangements, i.e. information that is collected for business purposes. No disclosure is required if the SME does not have practices, policies or future initiatives to report.
3. **Transition plan for Climate (E1-1) [16], Specifically, paragraph 16 (b) of ESRS E1 requires to disclose the decarbonization levers and actions in the value chain.**	***Conclusion:*** no undue effect on SMEs expected from ESRS reporting • ***Perspective 1***: effects on SME may be due to specific arrangements, if any • ***Perspective 2***: since VSME covers this disclosure.
	Disclosures in VSME: Comprehensive Module C3 – GHG reduction targets and climate transition
	Users' needs (looking at the users of the VSME) This information is included in most business partner ESG questionnaires (lenders, investors, corporate clients). They need this information to establish their own transition plan for sustainability management purposes. ESRS do not require to have a transition plan in place but to disclose the plan if it exists.
	Perspective 1 ESRS Set 1 preparers are expected to get information from suppliers to manage their transition plan and define their actions and decarbonisation levers (when they exist). The information is expected to be collected for sustainability-management purposes, when it involves its suppliers in the actions from its transition plan. Therefore, ESRS reporting of these disclosures is not expected to result in significant additional trickle-down effect on SMEs, in isolation from other considerations such as business or sustainability due diligence processes. ***Perspective 2*** VSME has very simplified requirements for transition plan, if applicable.
4. **GHG emissions (E1-6) - Scope 3[17]**	***Conclusion:*** no undue effect on SMEs expected from ESRS reporting • ***Perspective 1***: since Set 1 preparers will generally use sectoral data instead of collecting direct data • ***Perspective 2***: since covered by VSME disclosures
	Disclosures in VSME: • **Basic module** – B3 – GHG emission Scope 1 and 2 • **Comprehensive module** – Consideration when reporting on GHG emissions under B3 (Basic Module)
	Users' needs: GHG Scope 3 is considered too complex for the basic module, but an entity-specific consideration has been included in Comprehensive module, depending on the sector of the SME. GHG scope 3 emission is not a requirement for VSME unless the undertaking decides considering the sector, to report under the Comprehensive module. In this case the preparation of the disclosure depends on the availability of sector proxies or estimates.

[16] Included in row 9 of the value chain map in the draft EFRAG IG 2: VCIG.

[17] Included in row 8 of the value chain map in the draft EFRAG IG 2: VCIG.

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
	Perspective 1 Relevant Scope 3 figures can be calculated using average emission factors (i.e. secondary data). ESRS Set 1 preparers that have Scope 3 GHG emission reduction targets (implying that they agree with the reductions by their suppliers) may collect direct information from suppliers to monitor progress on such targets in the context of their due diligence processes. In this case, they would have more precise information from suppliers and would not have to use proxies in their ESRS report. Therefore, the ability to ask direct information from suppliers in the context of target setting and monitoring can support more and better understanding of climate actions in the supply chain, but a valid calculation Scope 3 emissions can be achieved without it. Accordingly, there is no additional trickle-down effect due to reporting, in isolation from other considerations such as business or sustainability due diligence processes. ***Perspective 2*** No requirements in VSME, but entity-specific consideration depending on sectors
5. **GHG removals (E1-7)**	***Conclusion:*** Additional information (not for ESRS reporting but for the implementation of possible specific arrangements) may be needed beyond VSME but is too specific to be covered by VSME
	Disclosures in VSME: Excluded in sector agnostic level due to the complexity.
	Perspective 1/ 2 When the SME has agreed to implement GHG removal actions as part of (or in agreement with) the GHG removal actions of a corporate client, the SME is expected to transfer information to its client in the context of the specific project. This would be additional to the VSME, as this type of information is too specific to be covered in a general (sector agnostic) standard like VSME as confirmed in the consultation).
6. Microplastics	***Conclusion:*** As for GHG removals above. ***Disclosures in VSME:*** Excluded in sector agnostic level due to the complexity.
7. Substances of concern and substances of very high concern (E2-5) [18] **(as defined in**	***Conclusion:*** As for GHG removals above. ***Perspective 1:*** effects on SME may be due to specific arrangements, if any ***Perspective 2:*** information (not for ESRS reporting but for the implementation of possible specific arrangements) may be needed beyond VSME but is too specific to be covered by a sector agnostic general questionnaire
	Disclosures in VSME: Excluded at sector agnostic level in VSME due to the complexity. Sector considerations will be covered in the consultation.

[18] Referred to as procured materials, row 7 of the value chain map in the draft EFRAG IG 2: VCIG. Resource outflows per E5-4 in row 9 of the value chain map given SME specificities and the qualitative nature of the requirement.

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
the REACH regulation[19])	***Perspective 1/2*** Corporate clients need the information on the sourced substances to manage their business, not for reporting purposes This has been excluded as too specific to be covered in a general (sector agnostic) standard like VSME.
8. **Resource inflows (E5-4)**	***Conclusion:*** no undue effect on SMEs expected from ESRS reporting ***Perspective 1***: effects on SME may be due to specific arrangements, if any ***Perspective 2***: Additional information (not for ESRS reporting but for the implementation of possible specific arrangements) may be needed beyond VSME but is too specific to be covered by VSME.
	Disclosures in VSME: Excluded at sector agnostic level in VSME due to the complexity. However, B 7 Resource use, circular economy, and waste management is required for SMEs operating in sectors using significant material flows for example manufacturing, construction and/or packaging process (annual mass flow of relevant materials used); in addition all SMEs are requested to report on annual generation waste and breakdown by type(hazardous/non) and annual waste diverted to reuse or recycle.
	Perspective 1/2 For certain undertakings having a knowledge of the sustainability profile of their sourced material will be likely needed, which may result in collection of data from suppliers. This would be additional to VSME, however according to the indications received so far by EFRAG this type of information is too specific to be covered in a general (sector agnostic) questionnaire like VSME.
9. **Entity-specific disclosures**	***Conclusion:*** ***Perspective 1***: Possible trickle-down effect under specific arrangements for Set 1 preparers to be able to cover material sector information and / or to disclose entity-specific disclosure, when they involve the value chain ***Perspective 2***: not applicable, as the nature of the datapoint required by large undertakings to SMEs cannot be defined (due to entity-specific nature of the disclosure).
	Disclosures in VSME: VSME par. 10 - Depending on the type of activities carried out by the undertaking, the inclusion of additional information (metrics and/or narrative disclosures) not covered in this [draft] Standard is appropriate in order to disclose sustainability issues that are common in the undertaking's sector (i.e. typically encountered by businesses or entities operating within a specific industry or field) or that are specific

[19] Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

Value chain datapoint in ESRS Set 1	Trickle-down assessment for VSME
	to the undertaking, as this supports the preparation of relevant, faithful, comparable, understandable and verifiable information. This includes the consideration of information on Scope 3 GHG emissions (see paragraphs 50 to 53 of this [draft] Standard on the consideration when reporting on GHG emissions under B3). Appendix B provides a list of possible sustainability issues. This is not a 'shall' but expected to be considered in some sectors.

Summarising the potential trickle-down effect

8. In conclusion, non-listed SMEs that apply VSME will in general be able to meet the data requests defined for value chain in LSME ESRS, except for specific cases. These cases correspond to value chain disclosures which are included in ESRS Set 1 (therefore SMEs may receive data requests from large undertakings relating to these disclosures, either due to their ESRS reporting obligations or for other obligations and business purposes), but are not included in the VSME, due to their excessive complexity for non-listed SMEs in general. They are principally of a sectorial nature (GHG Removals, microplastics, substances of concern/high concern, resource inflows), mainly needed for management or specific arrangement purposes.

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Annex 9: Changes agreed by the EFRAG SRB on the SR TEG approved version of the VSME

Objective of this [draft] Standard and to which undertakings it applies

1. The objective of this voluntary [draft] Standard is to support micro-, small- and medium-sized undertakings in:

   (a) providing information that will help satisfy the data demands ~~needs~~ of large undertakings requesting sustainability information from their suppliers;

   (b) providing information that will help satisfy data demands from ~~lenders/credit providers~~banks and investors, therefore helping undertakings in their access to finance;

   (c) improving the management of the sustainability issues they face, i.e.~~,~~ environmental and social challenges such as pollution, workforce health and safety. This will support their competitive growth and enhance their resilience in the short-, medium- and long-term; and

   (d) contributing to a more sustainable and inclusive economy.

2. This [draft] Standard is voluntary. It ~~and~~ applies to micro-[1], small- and medium-sized undertakings whose securities are not admitted to trading on a regulated market in the European Union (not listed). [[Article 3 of Directive 2013/34/EU]] defines ~~and distinguishes~~ three categories of small- and medium-sized undertakings based on their balance sheet total, their net turnover and their average number of ***employees*** during the financial year.

   (a) An undertaking is micro if it does not exceed two of the following thresholds:

      i. €450,000 in balance sheet total~~;~~;

      ii. €900,000 in net turnover; and;~~, and~~

      iii. an average of 10 employees.

   (b) An undertaking is small if it does not exceed two of the following thresholds:

      i. €5 million in balance sheet total~~;~~;

3. These undertakings fall outside the scope of the Corporate Social Reporting Directive (CSRD) but are encouraged to use this [draft] Standard ~~to prepare and share with whomever such sustainability information may concern~~. This [draft] Standard covers the same sustainability issues as the European Sustainability Reporting Standards (ESRS) for large undertakings. However, it is ~~based upon the key concept of~~ proportionality~~te~~ and therefore takes into account micro-, small- and medium-sized undertakings' fundamental characteristics. Micro- undertakings are welcome to use only certain parts of this [draft] Standard as highlighted in paragraph 5-(a).

4. Consistency with ESRS for large undertakings has been carefully considered in the preparation of this [draft] Standard~~,~~ while defining proportionate requirements. This [draft] Standard has no legal authority~~,~~ unlike the ESRS for large undertakings.

[1] This includes self-employed, non-incorporated undertakings and listed micro undertakings.

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~~Modules that constitute~~Structure of this [draft] Standard

5. This [draft] Standard ~~includes~~ has ~~two~~three modules that the undertaking can use ~~as the basis for preparation of~~to prepare its sustainability report:

   (a) **Basic Module:** Disclosures B-1 and~~,~~ B-2 and Basic Metrics (B-3 to B-11). This module is the target approach for micro-undertakings and constitutes a minimum requirement for other undertakings; and~~.~~

   (b) **Comprehensive Module:** ~~T~~this module sets datapoints ~~to be reported~~ in addition to disclosures B-1-B-11, which are likely to be requested by ~~included in data requests from~~ lenders, investors and corporate clients of the undertaking.

   Paragraph 24 below illustrates the available options for the preparation of a sustainability report using this [draft] Standard by adopting one or more of these modules. Once chosen, a module shall be complied with in its entirety (with flexibility allowed under paragraph 22)~~;~~, however, each item of disclosure~~s~~ shall be provided only when it is applicable to the undertaking's specific circumstances.

6. Applying the B~~B~~asic M~~M~~odule is a prerequisite for applying the C~~C~~omprehensive M~~M~~odule.

7. Appendix A *Defined terms* includes the definitions of the terms used in this [draft] Standard. Throughout the VSME Standard, the terms ~~that are~~ defined in the glossary of definitions (Appendix A) are ~~put~~ set in ***bold italic~~s~~***, except when a defined term is used more than once in the same paragraph.

Principles for the preparation of the sustainability report (Basic and Comprehensive Module)

Complying with this Standard

8. This [draft] Standard sets requirements that allow the undertaking to provide relevant information on:

   (a) how ~~its business~~it has had and is likely to have a positive or negative ***impact*** on people or on the environment in the short-, medium- or long-term; and

   (b) ~~which and~~ how environmental and social issues have affected or are likely to affect its financial position, performance and cash flows in the short-, medium- or long-term.

9. The ~~sustainability report~~undertaking shall ~~provide~~ report information that is relevant, faithful, comparable, understandable and verifiable.

10. Depending on the type of activities carried out by the undertaking, the inclusion of additional information (metrics and/or narrative disclosures) not covered in this [draft] Standard is appropriate in order to disclose sustainability issues that are common in the undertaking's sector (i.e. typically encountered by businesses or entities operating within a specific industry or field) or that are specific to the undertaking, as this supports the preparation of relevant, faithful, comparable, understandable and verifiable information. This includes the consideration of information on Scope 3 GHG emissions (see paragraphs 5048 to 531 of this [draft] Standard on the consideration when reporting on GHG emissions under B3). Appendix B provides a list of possible sustainability issues.

11. The undertaking may complement the metrics from the B~~B~~asic and C~~C~~omprehensive modules with additional qualitative and/or quantitative information~~,~~ where appropriate~~,~~ in accordance with paragraph 10 above.

Comparative information

12. The undertaking shall report cComparative information in respect of the previous year~~, shall be included in the report~~ except for metrics ~~being~~ disclosed for the first time. The undertaking shall report ~~inclusion of~~ comparative information ~~shall begin~~from the second year of reporting ~~and continue henceforth~~.

If applicable principle

13. Certain disclosures only apply to specific circumstances[2]. In particular, the instructions provided in each disclosure specify the circumstances and~~following instructions specify that, in these circumstances,~~ the information that is to be reported only if considered 'applicable' by the undertaking. When one of these disclosures is omitted, it is assumed to not be applicable.

Inclusion of subsidiaries in the reported data

14. If the undertaking is a parent company of a group, it is recommended that it prepares its sustainability report on a consolidated basis, including ~~the~~ information ~~of~~ from its subsidiaries.

15. If the parent undertaking has prepared its sustainability report on a consolidated basis, including ~~the~~ information ~~of~~ from its subsidiaries, the subsidiary undertakings are exempted from reporting.

Timing and location of the sustainability report

16. If a sustainability report is prepared ~~on the demand~~to meet the needs of large undertakings or lenders that require an update annually, it shall be prepared ~~on an annual basis~~annually. If the undertaking prepares financial statements, it shall be prepared with a period of time that is consistent with the preparation of the financial statement~~tt shall be make available its sustainability report for issuance at the same time as the financial statements if they are prepared~~. ~~In case~~If specific datapoints did not change from the previous reporting year, the undertaking shall either disclose the information provided for that specific datapoint from the previous year or indicate that no changes have occurred.~~may indicate that no changes occurred and refer to the information provided for that specific datapoint from the previous year.~~

17. The primary function of this report is to inform actual or potential business counterparties. The u~~U~~ndertaking~~s~~ may decide to make its sustainability report ~~also~~ available to the public. In this case, the undertaking may present its sustainability report in a separate section of the management report if ~~the latter is required by applicable law and regulations or if the management report is prepared voluntarily~~it has one. Otherwise, the undertaking may present its sustainability report ~~in~~ as a ~~different~~ separate document.

18. To avoid publishing the same information twice, the undertaking may refer in its sustainability report to disclosures published in other documents that can be accessed at the same time as the sustainability report[3].

Classified and sensitive information ~~and information on intellectual property, know-how or results of innovation~~

19. When the provision of the disclosures in this [draft] Standard ~~would~~ require disclosing ***classified*** or ***sensitive information***, the undertaking may omit such information. If the undertaking decides to omit such information, it shall ~~simply~~ state that this is the case under disclosure B1 (see paragraph 24).

Coherence and linkages with disclosures in financial statements

20. ~~When~~ If the undertaking also prepares financial statements, the information provided in its sustainability report following this [draft] Standard:

    (a) shall be coherent with what is reported in the financial statements for the same period; and

    (b) ~~may~~ be presented in a way that facilitates the understanding of the linkages that exist with the information reported in financial statements, for example~~,~~ by using appropriate cross-references.

[2] For example~~:~~, the legal requirement to disclose specific information, or~~;~~ already voluntarily disclosing specific information through an Environmental Management System~~, etc~~.

[3] In ~~the~~ a future online tool version of the VSME Standard, the undertaking may refer to disclosures published in other documents rather than the sustainability report using incorporation by reference. Such~~The~~ reference is made by including the page number of the relevant source, provided ~~that~~that the ~~pdf~~ PDF format of the source document is also made available in the online tool version.

Basic Module

21. The undertaking shall report on its environmental, social and ***business conduct*** issues (together ~~"~~sustainability issues~~"~~) using the B-1 to B-11 disclosures below.

22. ~~The~~ If the undertaking ~~that~~ wants to provide more comprehensive information, it may also integrate the metrics required from B–1 to B–11 with disclosures, selecting them from the CComprehensive MModule.

23. Additional guidance on disclosures ~~Instructions supporting the preparation of metrics~~ B-1 to B-11 is ~~are~~ available in ~~the Basic Module guidance on pages 16 through 44 of this [draft] Standard~~paragraphs 66 to 221.

~~23.~~ **Basic Module – Cross-cutting Metrics**

B-1 – Basis for preparation

24. The undertaking shall disclose:

(a) which of the following options it has selected ~~in the preparation of its sustainability report using this [draft] Standard~~:

i. OPTION A: Basic Module (only); or

ii. OPTION B: Basic Module and Comprehensive Module;~~.~~

(b) if the undertaking has omitted a disclosure as it is deemed ~~confidential~~ ***classified*** or ***sensitive information*** (see paragraph 19), the undertaking shall indicate the disclosure~~s~~ that ha~~sve been~~ omitted.

(c) whether the sustainability report has been prepared on an individual basis (i.e.~~,~~ the report is limited only ~~only~~ to the ~~information of the~~ undertaking's information only) or on a consolidated basis (i.e.~~,~~ the report includes information ~~of~~ about the undertaking and its subsidiaries);

(d) in ~~the~~ case of a consolidated report, the list of the subsidiaries, including their registered address~~,~~[4], covered in the ~~consolidated sustainability~~ report; and

(e) the following information:

i. the undertaking's legal form;

ii. NACE s~~S~~ector classification code(s);

iii. size of the balance sheet (in E~~e~~uro~~s~~);

iv. turnover (in E~~e~~uro~~s~~);

v. number of ***employees*** in headcount or full~~-~~time equivalents;

vi. country of primary operations and location of significant asset(s); and

vii. geolocation of ***sites*** owned, leased or managed.

~~25. The undertaking shall disclose the key elements of its business model and strategy, including:~~

~~(a) a description of significant groups of products and/or services offered;~~

~~(b) a description of significant market(s) the undertaking operates in (such as B2B, wholesale, retail, countries);~~

~~(c) a description of its main business relationships (such as key suppliers, customers distribution channels and ***consumers***); and~~

~~(d) if the strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements.~~

~~26.~~25. If the undertaking has obtained any sustainability-related certification ~~ESG certificate~~ or label, it shall provide a brief description of those (including, where relevant, the issuers of the certification ~~such as certificate~~ or label ~~issuers~~, date~~,~~ and rating score).

[4] The registered address is the official address of the undertaking.

B 2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

27.

26. If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, it shall state so. The undertaking shall state whether it has:

(a) practices. Practices in this context may include, for instance, efforts to reduce the undertaking's water and electricity consumption, to reduce GHG emissions or to prevent pollution, and initiatives to improve product safety as well as; current initiatives to improve working conditions and equal treatment in the workplace, sustainability ***training*** for the undertaking's workforce, and partnerships related to sustainability projects;

(b) ***formal policies*** on sustainability issues, whether they are (and if they are publicly available, and) as well as any separate environmental, social or governance policy policies for addressing sustainability issues;

(c) any future initiatives or forward-looking plans that are being implemented on sustainability issues; and

(d) ***targets*** to monitor the implementation of the ***policy policies*** and the progress achieved towards meeting such targets.

28. Such practices, policies and future initiatives include what the undertaking does to reduce its negative ***impacts*** and to enhance its positive impacts on people and the environment, in order to contribute to a more sustainable economy. Appendix B provides a list of possible sustainability issues. When there are policies in place or future initiatives being implemented, the undertaking may indicate who is responsible for monitoring those in the governance body.

27. The undertaking can may use the template found in paragraph 787 to report these disclosuresthis information.

29.28. If the undertaking also reports on the Comprehensive module, it shall complement the B2 with the datapoints found in C2.

Basic Module metrics – Environment metrics

B 3 – Energy and greenhouse gas emissions

30.29. The undertaking shall disclose its total energy consumption in MWh, with a breakdown as per the table below, if availableif the undertakingit can obtain the necessary information to provide such a breakdown:

	Renewable	Non-renewable	Total
Electricity (as reflected in utility billings)			
Fuels			
Total			

(a) The undertaking shall disclose its estimated ***gross greenhouse gas (GHG) emissions*** in tons of CO_2 equivalent (tCO_2eq) considering the content of the GHG Protocol Corporate StandardGHG Protocol Corporate Standard (version 2004), including:

30.

(b)(a) the Scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and

(c)(b) the ***location-based Scope 2 emissions*** in tCO_2eq (i.e., emissions from the generation of purchased energy, such as electricity, heat, steam or cooling).

31. The undertaking shall disclose its GHG intensity calculated by dividing '***gross greenhouse gas (GHG) emissions***' disclosed under paragraph 302 by 'turnover (in Euros)' disclosed under paragraph 24 (e) (iv).[5]

B-4 – Pollution of air, water and soil

32. ~~When~~ If the undertaking is already required by law or other national regulations to report to competent authorities its ~~pollutants~~ emissions of pollutants, or ~~when~~ if it ~~already~~ voluntarily reports on them according to an Environmental Management System, it shall disclose the pollutants ~~(with the respective amounts)~~ it emits to air, water and soil in its own operations, with the respective amount for each pollutant. If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.

B-5 – Biodiversity

33. The undertaking shall disclose the number and area (in hectares) of ***sites*** that it owns, has leased, or manages in or ***near*** a ***biodiversity sensitive area~~s~~***.

34. The undertaking may disclose metrics related to ***land-use***:

    (a) total use of land (in hectares)~~;~~;

    (b) total sealed area~~;~~;

    (c) total ***nature-oriented area*** on-site~~;~~; and ~~and~~

    (d) total ***nature-oriented area*** off-site.

B-6 – Water

35. The undertaking shall disclose its total ***water withdrawal***, i.e.~~,~~ the amount of water drawn into the boundaries of the organisation (or facility); in addition, the undertaking shall separately present the amount of water withdrawn at ***sites*** located in areas of high water~~-~~stress.

36. ~~If applicable~~If the undertaking has production processes in place which significantly consume water (e.g.~~,~~ thermal energy processes like drying or power production~~;~~, production of goods, agricultural irrigation, etc.), it~~, the undertaking~~ shall disclose its ***water consumption***~~,~~ calculated as the difference between its ***water withdrawal*** and water discharge from its production processes.

B-7 – Resource use, circular economy and waste management

37. The undertaking shall disclose whether ~~and if yes how~~ it applies ***circular economy principles*** and, if so, how it applies these principles.

38. The undertaking shall disclose:

    (a) the total annual generation of waste broken down by type (non-hazardous and hazardous);

    (b) the total annual waste diverted to ***recycling*** or reuse; and

    (c) if the undertaking operates in a sector using significant material flows (for example manufacturing, construction, packaging or others), the annual mass-flow of relevant materials used.

[5] In ~~the~~ a future online tool version of the VSME Standard, this will be automatically calculated.

Basic ~~metrics~~ Module – Social ~~mattersmetrics~~

B-8 – Workforce – General characteristics

39. The undertaking shall disclose the number of ***employees*** in headcount or full-time equivalent for the following metrics:

    (a) type of employment contract (temporary or permanent)~~;~~;

    (b) gender; and~~; and~~

    (c) country of the employment contract, if the undertaking operates in more than one country.

40. If t~~T~~he undertaking employs 50 or more ***employees***, it shall disclose the employee turnover rate ~~over~~ for the reporting period ~~for undertakings that employ at least 50 employees~~.

B-9 – Workforce – Health and safety

41. The undertaking shall disclose the following information regarding its ***employees***:

    (a) the number and rate of ***recordable work-related*** accidents; and

    (b) the number of fatalities as a result of work-related injuries and work-related ill health.

B-10 – Workforce – Remuneration, collective bargaining and training

42. The undertaking shall disclose:

    (a) whether the ***employees*** receive ~~a~~ ***pay*** that is equal or above applicable minimum ***wage*** for the country it reports in, determined directly by the national minimum wage law or through a ***collective bargaining*** agreement;

    (b) the percentage gap in ***pay*** between its female and male ***employees***. The undertaking may omit this disclosure when its headcount is below 150 employees ~~and~~ noting that this threshold will be reduced to 100 employees from 7 June 2031;

    (c) the percentage of ***employees*** covered by ***collective bargaining*** agreements; and

    (d) the average number of annual ***training*** hours per ***employee***, broken down by gender.

Basic ~~metrics~~ Module – ~~Business conduct~~Governance metrics

B-11 – Convictions and fines for corruption and bribery

43. In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.

Comprehensive Module

44. This module provides disclosures ~~that are expected~~ to address in a comprehensive way the information needs ~~of~~by the undertaking's business partners, such as investors, lenders and corporate clients in addition to the ones included in the ~~basic module~~Basic Module. The disclosures in this module reflect the financial market participants and corporate clients' respective obligations under relevant laws and regulations. ~~At the same time,~~ They also reflect the information needed by the business partners, ~~in order to~~to assess the sustainability ~~(risk)~~ profile of the undertaking, e.g. as a (potential) supplier or a (potential) borrower.

Disclosures in the Comprehensive Module

45. The text below provides the list of disclosures from C-1 to C-97 to be considered and reported upon, if they are applicable to the undertaking's business and organisation. When not reported upon, a disclosure shall be assumed to be 'not applicable' for the undertaking.

46. Additional guidance on ~~Instructions supporting the preparation of~~ disclosures C-1 to C-97 ~~are~~ is available in ~~paragraphs 224 to 256~~the Comprehensive Module guidance on pages 45 through 48 of this [draft] Standard.

Comprehensive Module – Cross-cutting Metrics

C-1 – Strategy: Business Model and Sustainability – Related Initiatives

47. The undertaking shall disclose the key elements of its business model and strategy, including:

(a) a description of significant groups of products and/or services offered;

(b) a description of significant market(s) the undertaking operates in (such as B2B, wholesale, retail, countries);

(c) a description of main business relationships (such as key suppliers, customers distribution channels and ***consumers***); and

(d) if the strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements.

C-2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

48. If the undertaking has put in place specific practices, ***policies*** or future initiatives for transitioning towards a more sustainable economy, which it has already reported under disclosure B2 in the Basic Module, it shall briefly describe them using. The undertaking may use the template found in paragraph 225~~XX~~.

49. The undertaking may indicate, if any, the most senior level of the undertaking accountable for implementing them.

~~46.~~

Comprehensive Module - Environmental Metrics

~~Entity specific c~~Consideration when reporting on GHG emissions under B-3 (Basic Module)

~~47.~~50. Depending on the type of activities carried out by the undertaking, disclosing a quantification of its Scope 3 GHG emissions can ~~yield relevant information~~be appropriate (see paragraph 10 of this [draft] Standard) ~~and~~ to yield relevant information on the undertaking's ***value chain impacts*** on climate change.

51. Scope 3 emissions are ***indirect GHG emissions*** (other than Scope 2) that derive from an undertaking's ***value chain***. They include the activities that are upstream of the undertaking's operations (e.g., purchased goods and services, purchased capital goods, transportation of purchased goods, etc.) and activities that are downstream of the undertaking's operations (e.g., transport and distribution of the undertaking's products, use of sold products, investments, etc.).

48.52. If the undertaking decides to provide this metric, it should refer to the 15 types of Scope 3 GHG emissions identified by the GHG Protocol Corporate Standard and detailed by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. When it reports on Scope 3 GHG emissions, the undertaking shall includes significant Scope 3 categories (as per the Corporate Value Chain (Scope 3) Accounting and Reporting Standard) based on its own assessment of relevant Scope 3 categories. Undertakings can find further guidance on specific calculation methods for each category in the GHG Protocol's "*Technical guidance for Calculating Scope 3 Emissions*".

49.53. When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under "B-3 – Energy and greenhouse gas emissions."

Disclosure C-313 – GHG reduction targets and climate transition

50.54. If the undertaking has established GHG emission reduction ***targets***, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 5049 to 531 above and depending on the nature of its activities, the undertaking shall also provide targets for significant Scope 3 emissions. If the undertaking has set GHG emission reduction targets, it shall provide its GHG emission reduction targets in absolute value for scope 1, scope 2 and, if applicable, significant scope 3 emissions. In particular, it shall provide:

(a) tThe target year and target year value;

(b) the base year and base year value;

(c) the units used for ***targets***;

(d) the share of the Sscope 1, sScope 2 and, if disclosed, Sscope 3 concerned bythat the target concerns; and

(e) a list of main actions it seeks to implement to achieve its ***targets***.

51.55. If the undertaking that operates in high climate impact sectors[6] has adopted a transition plan for climate change mitigation, it may provide information about it, including an explanation of how it is contributing to reduce GHG emissions.

52.56. In case the undertaking operates in high- climate impact sectors and does not have a transition plan for climate change mitigation in place, it shall indicate whether and, if so, when it will adopt such a transition plan.

Disclosure C-424 – Climate risks

53.57. If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall:

(a) briefly describe such climate-related hazards and climate-related transition events;

(b) disclose how it has assessed the exposure and sensitivity of its assets, activities and ***value chain*** to these hazards and transition events;

(c) disclose the ***time horizons*** of any climate-related hazards and transition events identified; and

(d) disclose whether it has undertaken ***climate change adaptation*** actions for any climate-related hazards and transition events.

54.58. The undertaking may disclose the potential adverse effects of physicalclimate risks, that may affect its financial performance or business operations in the short-, medium- or long-term, with an indication as toindicating whether the undertakingit assesses that the risks to be is high, /medium,/ low.

[6] High climate impact sectors are those listed in NACE Sections A to H and Section L as defined in Annex I to Regulation (EC) No 1893/2006.

Comprehensive Module - Social Metrics

Disclosure C 535 – Additional (general) Wworkforce (General) Additional characteristics

55 59. If the undertaking employs 50 or more ***employees***, the undertakingit may disclose the female - to - male ratio at management level for the reporting period.

56 60. If the undertaking employs 50 or more ***employees***, the undertakingit may disclose the number of those self-employed without personnel that who are working exclusively for the undertaking, and temporary workers provided by undertakings primarily engaged in "'employment activities"'.

Disclosure C 646 – Additional own workforce metric - Human rights policies and processes

57 61. The undertaking shall disclose an answer to the following questions :

(a) Does the undertaking have a code of conduct or human rights ***policy*** for its ***own workforce***? (YES/NO)

(b) If yes, does this cover (dropdown menu):

i. Cchild labour (YES/ NO);

ii. Fforced labour (YES/ NO);

iii. hHuman trafficking (YES/ NO);

iv. dDiscrimination (YES/ NO);

v. aAccident prevention (YES/ NO); or

vi. oOther? (YES/NO , if yes, specify).

(c) Does the undertaking have a complaints - handling mechanism for its ***own workforce***? (YES/NO)

Disclosure C 757 – Severe negative human rights incidents

58 62. The undertaking shall disclose an answer to the following questions:

(a) Does the undertaking have confirmed incidents in its ***own workforce*** related to: :

i. cChild labour (YES/ NO);

ii. Fforced labour (YES/ NO);

iii. hHuman trafficking (YES/ NO);

iv. dDiscrimination (YES/ NO); or

v. Oother? (YES/NO , if yes, specify).

(b) If yes, the undertaking may describe the ***actions*** being taken to address the ***incidents*** described above.

(c) Is the undertaking aware of any confirmed ***incidents*** involving ***workers in the value chain***, ***affected communities***, ***consumers*** and ***end-users***? If soyes, specify, explain.

Comprehensive Module – Governance Metrics

Disclosure C 861 – Revenues from certain sectors and exclusion from EU reference benchmarks

59 63. If the undertaking is active in one or more of the following sectors, it shall disclose its related revenues in the sector(s):

(a) controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); or

(b) the cultivation and production of tobacco; or

(c) fossil fuel (coal, oil and gas) sector (i.e. the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of

Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, ~~from~~ oil and ~~from~~ gas; or

(d) chemicals production~~,~~ if the undertaking is a manufacturer of pesticides and other agrochemical products.

~~60.~~64. The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement.

~~Disclosure~~ C ~~9~~72 – Gender diversity ratio in the governance body

~~61.~~ If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.

65.

Basic Module: Guidance

62.66. The guidance below is intended as part of an ecosystem that will include also the development of further implementation guidance by EFRAG, further digital tools and implementation support (educational activities, stakeholders' engagement) that aim ~~at~~ to ~~facilitating~~ facilitate the understanding of some of the technical elements ~~present~~ in the guidance.

67. This guidance supports undertakings that wish to apply ~~the preparation of the Metrics in~~ the Basic Module.

~~63.~~ Basic Module Guidance – Cross-cutting Metrics

~~Metric~~ B1 – Basis for Preparation

64.68. When reporting on the legal form of the undertaking according to national legislation under paragraph 24(e)(i), the undertaking can~~shall~~ choose from one of the following undertaking structures:

(a) p~~P~~rivate limited liability undertaking

(b) s~~S~~ole proprietorship

(c) p~~P~~artnership

(d) c~~C~~ooperative

(e) o~~O~~ther (please specify~~/ depending~~based~~ ~~ on country ~~specificity for~~specifications for legal forms).

~~65. When reporting on the NACE code(s) of the undertaking under paragraph 24(e)(ii), it is also recommended to identify the NACE code with the highest possible level of detail for each operational, administrative, or management unit.~~

66.69. When reporting on the NACE code(s) of the undertaking under paragraph 24(e)(ii), NACE codes (Nomenclature statistique des activités économiques dans la Communauté Européenne) are ~~a~~ classifications of economic activities used in the European Union. They provide a standardized framework for classifying economic activities into sectors, enabling comparability and a common understanding among the various EU countries.

67.70. The NACE code consists of a number of digits ranging from 2 to 5~~,~~ depending on the level of specificity with which the economic activity is identified. The list of NACE codes can be found in the following document: REGULATION (EC) No 1893/2006.

Level Nr	Identifier	Description
1	Section	Sections are identified by an alphabetic letter, and they define 21 general economic areas~~,~~ such as agriculture, manufacturing industry~~,~~ or commerce.
2	Division	The division is identified by a two-digit numerical code and identifies a specific sector within the general economic area. There are a total of 88 divisions.
3	Group	The group is identified by a three-digit numerical code (also considering the division's two digits) and defines a specific area within the sector. There are about 270 groups.
4	Class	The class is identified by a four-digit numerical code (considering the digits of division and group) and defines a specific activity within the group. There are about 450 classes.

68.71. When reporting the number of ***employees*** under paragraph 24 (e)(v), full-time equivalent (FTE) is the number of full-time positions in an undertaking. It can be calculated by dividing an employee's scheduled hours (total effective hours worked in a week) by the employer's hours for a full-time workweek (total hours performed by full-time employees). For example, an employee

who works 25 hours every week for a company where the full-time week is 40 hours represents a 0,625 FTE (i.e. 25/ 40 hours).

~~69.~~72. Headcount is the total number of people employed by the undertaking at a given time.

~~70.~~73. When reporting on the country of primary operations and the location of significant assets under paragraphs 24 ~~(e)~~(vi) ~~and 24(e)and~~ (vii), the undertaking shall disclose this information for each of its ***sites***~~,~~ using the table below:

Sites	Address	Postal Code	City	Country	Coordinates (geolocation)
Registered Office (e.g.)					
Warehouse (e.g.)					
Industrial Plant (e.g.)					

~~71.~~74. The geolocation of an undertaking is expected to be a valuable datapoint for stakeholders for the assessment of risks and opportunities connected to the SME, particularly in relation to the sustainability issues of ***climate change adaptation***, water, ecosystems~~,~~ and biodiversity.

~~72.~~75. The geolocation shall be provided in spatial points for single units~~,~~ or polygon points defining the boundaries of a larger, less unit-like ***site***, such as a farm, mine or facility. The undertaking may also provide a cluster of points to allow for the easy identification of the concerned area. The spatial points shall be provided as coordinates, with five decimal places (e.g. 0° 00′ 0.036″).

76. When disclosing the geolocation of ***sites*** owned, leased, or managed, the undertaking shall include the coordinates of the sites in the table shown in paragraph ~~75~~731. The undertaking may use web mapping tools (e.g. google maps, apple maps) to identify the coordinates of sites that it owns, leases~~,~~ or manages. The undertaking may also use any appropriate software tools or platforms to further establish the perimeter or area of larger sites.

~~73.~~

~~When describing the main consumers and supplier relationships under paragraph 25 (c), the undertaking shall disclose the estimated number of suppliers, and their related sectors and geographies (i.e. countries).~~

~~Examples of s~~In relation to paragraph 2~~5~~6, s~~S~~ustainability-related certification can include registered eco-labels from an EU, national or international labelling scheme, corresponding to the main activity of an SME. For instance, the EU Ecolabel covers specific ~~sector~~ products, such as textiles and footwear, coverings (e.g.~~,~~ wood floor coverings), cleaning and personal care products, electronic equipment, or furniture. The undertaking may consult the EU Ecolabel Product Groups and Product Catalogue for further information.

77.

~~74.~~

~~Metric~~ B-2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

78. ~~Under paragraphs 27-29 undertakings shall provide information related to their policies, actions and targets related to their operations, if they have them in place. Paragraph 30 suggests~~ U~~u~~ndertakings ~~to~~ may use the following template to report on B-2 datapoints.

Annex 9: Changes agreed by the EFRAG SRB on the SR TEG approved version of the VSME

	Do you have existing sustainability practices policies/ ~~practices/~~ future initiatives that address any of the following sustainability issues? [YES/NO]	Are they publicly available? [YES/NO]	Does the policy have any ~~future initiatives/~~targets? [YES/NO]
Climate Change			
Pollution			
Water and Marine Resources			
Biodiversity and Ecosystems			
Circular Economy			
Own Workforce			
Workers in the Value Chain			
Affected Communities			
Consumers and end-users			
Business conduct			

~~75.~~

~~[illegible]~~	~~Do you have existing sustainability policies/ practices that addresses any of the following sustainability issues?~~	~~Is it publicly available? [YES/NO]~~	~~Please briefly describe the practices/ policies and consequent actions (in case the policy or action covers~~	~~Does the policy have any targets? [YES/NO, if yes specify targets]~~	~~Indicate who is responsible in the governance body. [if any]~~

	~~[YES/NO]~~		~~suppliers or clients, the undertaking shall mention it)~~		
~~Climate Change~~					
~~Pollution~~					
~~Water and Marine Resources~~					
~~Biodiversity and Ecosystems~~					
~~Circular Economy~~					
~~Own Workforce~~					
~~Workers in the Value Chain~~					
~~Affected Communities~~					
~~Consumers and end-users~~					
~~Business conduct~~					

~~76.~~79. If the undertaking is a cooperative, it may disclose:

(a) the effective participation of workers, users or other interested parties or communities in governance;
(b) the financial investment in the capital or assets of social economy entities referred to in the Council Recommendation of 29 September 2023 (excluding donations and contributions); and

(c) any limits to the distribution of profits connected to the mutualistic nature or to the nature of the activities consisting in services of general economic interest (SGEI).

Guidance for own workforce, workers in the value chain, affected communities and consumers and end/users

80. In order to understand the sustainability ~~matters~~issues that relate to social and human rights, refer to Appendix B for a list of possible sustainability ~~matters~~ issues. This list could help identify if the policies or practices are aimed at addressing negative human rights ***impacts*** in a comprehensive way or if they are limited to certain groups of affected stakeholders (for example, workers in the upstream ***value chain***). As part of this disclosure undertakings may also disclose whether they have a process to address human rights related complaints.

~~(c)~~

Basic Module Guidance ~~–~~ Environmental Metrics

~~Metric~~ B ~~3~~ – Energy and greenhouse gas emissions

Impacts on climate: energy usage and greenhouse gas emissions

~~77.~~81. Under paragraphs 2931 and 302, the undertaking reports on its climate ***impacts***, providing information about its energy use and ***greenhouse gas emissions***. This guidance for disclosure B-3 does not constitute an additional datapoint to the disclosures described in paragraphs 2931 (on energy consumption) and 302 (on GHG emissions) but rather reinstates an overarching objective and provides context ~~of~~ for the ~~B~~Basic disclosure B-3.

Energy consumption

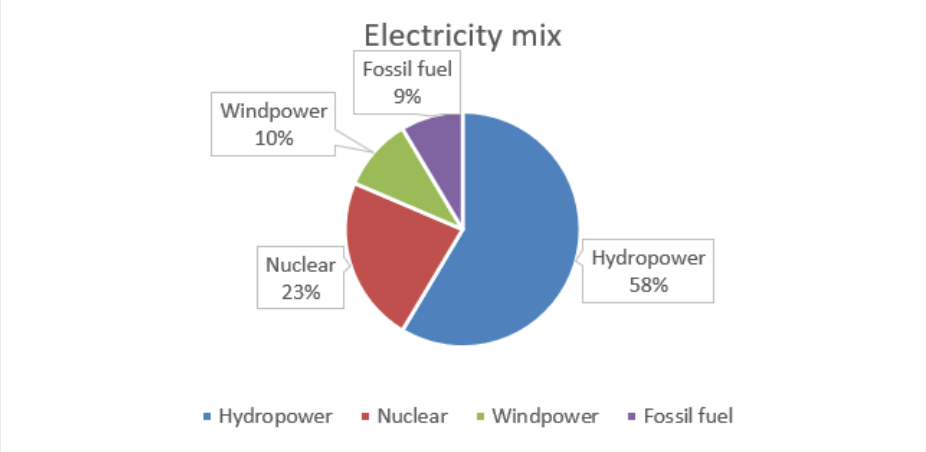
~~78.~~82. Climate related ***impacts*** are significantly driven by energy consumption. Therefore, it is relevant to disclose both the quantity as well as the type – e.g.~~,~~ fossil fuels such as coal, oil~~,~~ and gas versus ***renewable energy*** – and mix of energy consumed. Examples of energy disclosures are total energy consumption broken down by fossil fuels and electricity. Other breakdowns may be reported such as consumption of purchased or self-generated electricity from renewable sources. An example of the information requested in paragraph 2931 follows.~~:~~

	Renewable Energy Consumption (MWh)	**Non-renewable Energy Consumption (MWh)**	**Total 202(x) Energy consumption (MWh)**
Electricity (as reflected in utility billings)	300	186	486
Fuels	3	7	10
Total	303	193	496

~~79.~~83. In case the undertaking purchases fossil fuels (e.g.~~,~~ natural gas, oil) or renewable fuels (e.g.~~,~~ biofuels, such as biodiesel and bioethanol) to generate electricity, heat or cooling for its own consumption, it has to avoid double counting. Therefore, the undertaking accounts for the energy content of the purchased fuel only as fuel consumption, but it does not account for, or report on, its electricity and heat consumption produced from that fuel yet again. In case of electricity generation from renewable energies such as solar or wind – and where no fuel use is~~n~~ necessary – the undertaking accounts for the amount of electricity generated and consumed as electricity consumption.

~~80.~~84. The undertaking shall not offset its energy consumption by its energy production even if on ***site*** generated energy is sold to and used by a third party. The undertaking shall also avoid double counting fuel consumption when disclosing self-generated energy consumption. If the

undertaking generates electricity from either a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted only once under fuel consumption. The share of ***renewable energy*** consumption can be calculated based on guarantees of origin, renewable energy certificates, or electricity composition as stated in the electricity bill. The electricity bill may refer to electricity units consumed and specify the percentage of electricity provided coming from renewable sources and it may look like the figure below.



81.85. When preparing the information on energy consumption required under paragraph 2931, the undertaking shall exclude feedstocks and fuels that are not combusted for energy purposes. The undertaking that consumes fuel as feedstocks can disclose information on this consumption separately from the required disclosures.

Conversion between different energy units

82.86. Undertakings are to report their energy consumption in terms of final energy, which is understood as the amount of energy delivered to the undertaking, for example, the Megawatt-Hours (MWh) of electricity purchased from the utility steam received from a nearby industrial plant or diesel purchased at petrol stations. Electricity explicitly refers to heat, steam and cooling. Fuels include anything burned, e.g. gas, natural gas, biomass, etc.

83.87. Paragraph 2931 indicates MWh as the unit of choice for measuring energy consumption. In case of fuel or biomass, a conversion to MWh is necessary for data expressed in other units such as energy content (e.g. kJ, Btu), volume (e.g. litres, m³) or mass (e.g. metric tonnes, short tonnes).

84.88. For fuel consumption measured by mass (e.g. wood, coal), the undertaking should

(a) obtain the Net Calorific Value (e.g. kJ/metric ton, TJ/Gg) of the fuel (it can be a typical value published by reliable sources, e.g. IPCC, or may be provided by the supplier or attained internally);

(b) convert the Net Calorific Value to MWh/ton, for example,

1 TJ = 1,012 J = 277.78 MWh ; 1 Gg = 109 g = 1,000 t

11.9 TJ/Gg = 11.9 * 277.78/1000 t = 3.31 MWh/ton; and

(c) calculate the energy content of the mass, for example,

1,245,345 t * 3.31 MWh/ton = 4,117,111 MWh.

85.89. For liquid fuel, the undertakings should:

(d) convert volume information to mass, multiplying volume by fuel density, for example,

Diesel = 4,456,000 l; Diesel density = 0.84 kg/l

4,456,000 (l) * 0.84 (kg/l) = 3,

43,040 kg = 3,743 t;7calculate the energy content, multiplying mass by Net Calorific Value, for example,73,743 [t] * 43 [TJ/Gg] = 3,743 t * 43 TJ/(1,000 [t]) = 160.95 [TJ] ; and7convert TJ to MWh, for example~~,~~

(e) convert TJ to MWh, for example~~,~~

1 TJ = 1,012 J = 277.778 MWh

160.95 [TJ] = 277.78 [MWh/TJ] * 160.95 [TJ] = 44,708 MWh.

Documentation Source:

Data	*Documentation Source*
CDP	CDP Technical Note: Conversion of fuel data to MWh https://cdn.cdp.net/cdp-production/cms/guidance_docs/pdfs/000/000/477/original/CDP-Conversion-of-fuel-data-to-MWh.pdf?1479755175

Greenhouse gas emissions

~~86.~~ 90. As for gross ***greenhouse gas emissions*** (GHG) arising from the undertaking's activities, the requirement in paragraph 30~~2~~ builds on the definitions and rules of the GHG Protocol, the leading accounting standard for GHG emissions. Under paragraph 30~~2~~, undertakings are to report on their Scope 1 and Scope 2 emissions. Scope 1 GHG emissions cover direct emissions from owned or controlled sources. Scope 2 emissions are ***indirect GHG emissions*** resulting from the activities of the reporting company (as they derive from the undertaking's consumed energy) which, however, occur at sources owned or controlled by another company. Further guidance is provided in the sections below on how to calculate Scope 1 and 2 emissions.

~~87.~~ 91. Scope 1 and 2 emissions may be reported in the following format.

	202(x) GHG emissions (tCO_2e)
Scope 1	45
Scope 2	6
Total	51

~~88.~~ 92. The GHG Protocol is a global standard for measuring, reporting and managing GHG emissions while ensuring consistency and transparency. The ~~C~~corporate standard covers ~~S~~scope 1, ~~S~~scope 2 and ~~S~~scope ~~-~~3 emissions guidance for companies and other organisations (NGOs, government, etc.).

~~89.~~ 93. To ensure a fair account of the undertaking's emissions, the GHG Protocol has set a list of reporting principles:

(a) r~~R~~elevance: ensuring that the GHG inventory reflects the GHG emissions of the organisation.

(b) c~~C~~ompleteness: ensuring that the GHG inventory account for all ~~the~~ GHG emission sources and activities within the chosen boundary~~;~~

(c) c~~C~~onsistency: ensuring the consistency of the methodology used to allow for comparisons over time~~;~~

(d) t~~T~~ransparency: disclosing the assumptions, references and methodology used when computing GHG emissions; and~~,~~

(e) a~~A~~ccuracy: ensuring that GHG emissions data is sufficiently precise to allow users to make decisions.

94. In alternative to the GHG Protocol, undertakings may resort to ISO 14064-1, should it be better suited to their reporting needs.

~~90.~~ 95. When reporting on GHG emissions, it is important to set the appropriate boundaries to ensure that the GHG inventory is correct and to avoid double counting emissions. The GHG Protocol defines two main types of boundaries – organisational or operational boundaries.~~:~~

(a) Organisational boundary: the GHG Protocol defines it as the boundaries that determine the operations owned or controlled by the reporting undertaking~~,~~ depending on the consolidation approach taken. There are two approaches to consolidation of emissions ~~-~~ – the equity or control approach. The undertaking will choose the approach that reflects its circumstances.

(b) The equity share approach relates to accounting for GHG emissions from operations according to its shares of equity in the operation.

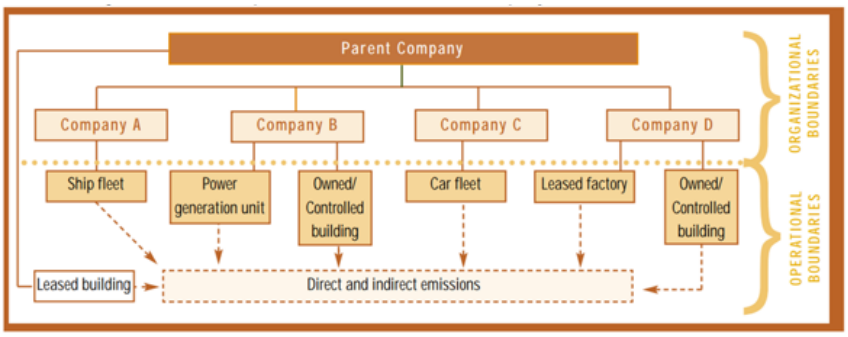
(c) When using the control approach, the undertaking accounts for GHG emissions from operations over which it has either financial or operational control. Companies will use either the operational control or financial control criteria when using this approach to consolidate and capture its emissions in the report.

i. Financial control means that the undertaking has financial control over the operation if the former has the ability to direct the financial and operating policies of the latter with a view to gaining economic benefits from its activities.

ii. Operational control means that an undertaking has operational control over an operation if the former or one of its subsidiaries has ~~the~~ full authority to introduce and implement its operating policies at the operation.

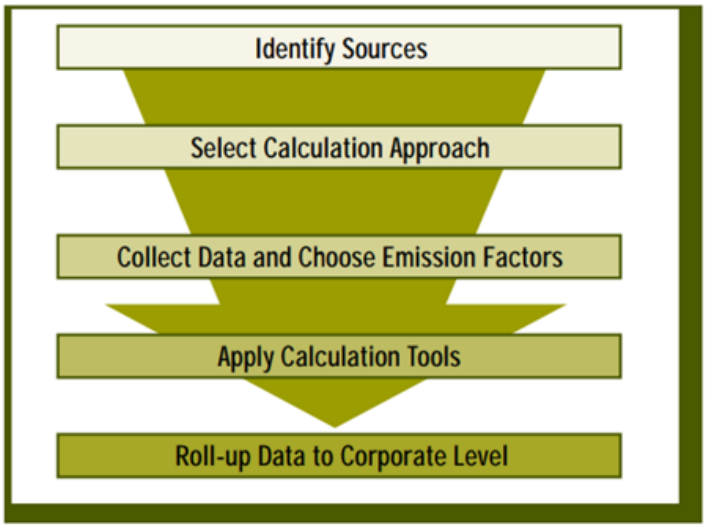
(d) Operational boundary: the GHG Protocol defines it as the boundaries that determine the direct and indirect emissions associated with operations owned or controlled by the reporting company. This assessment ~~allows~~ offers an undertaking the ability to establish which operations and sources cause direct (S~~s~~cope 1) and indirect emissions (S~~s~~cope 2 and Scope 3)~~,~~ and to decide which indirect emissions to include ~~that are a consequence of~~ resulting from its operations.

(e) ~~The b~~Boundary considerations need to follow the principles detailed above (consistency over time, transparency in documenting them and completeness)~~,~~ and ~~is~~ are visualised in the ~~picture~~ image below[7].



[7] Greenhouse Gas Protocol Corporate Standard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

~~91.~~ 96. The GHG Protocol also introduces guidance as well as steps to follow to identify, calculate and track GHG emissions~~,~~ as visualised in the ~~picture~~ image below[8].



~~92.~~ 97. Different tools have been developed by private and public initiatives to help undertakings in developing their GHG emissions inventory and facilitating challenges related to its preparation:

(a) c~~C~~alculation tools and guidance by the GHG Protocol: https://ghgprotocol.org/calculation-tools-and-guidance

(b) SME Climate hub: https://smeclimatehub.org/start-measuring/

(c) Business Carbon Calculator by Normative: https://businesscarboncalculator.normative.io/en/

(d) Carbon Trust SME Carbon Footprint Calculator: https://www.carbontrust.com/our-work-and-impact/guides-reports-and-tools/sme-carbon-footprint-calculator

(e) UK Business Climate hub: https://businessclimatehub.uk/carbon-footprint-calculators/

Scope 1 and location-based Scope 2 emissions guidance

~~93.~~ 98. Typical Scope 1 emissions include CO_2 (as well as CH_4 and N_2O) emissions associated with fuel combustion (for example~~,~~ in boilers, furnaces, vehicles, etc.) and fugitive emissions from air conditioning and industrial processes.

~~94.~~ 99. ***Location-based Scope 2*** includes emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company. It reflects the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).

~~95.~~ 100. Evaluating GHG emissions can be done in several ways, including by the calculation approach, measurement, or a combination of measurement and calculations. One ~~frequent~~ common approach is based on ~~calculation~~ calculating with use of emission factors (EF) – which may incorporate the global warming potential (GWP) of the GHG. Direct measurement using sensors (flow and concentration) can also be applied. The table below summarises the most common methods.

GHG evaluation method	Details	Necessary data

[8] Greenhouse Gas Protocol Corporate Standard: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

Measuring	Multiplying the quantities of gas directly measured by their respective global warming potential.	Direct quantity of gas emitted obtained from gas measurement (flow, concentration, volume) Global warming potential (GWP) of the gases
Calculating	Multiplying the activity data by the emission factor (EF) that integrates the global warming potential (GWP)	Activity data Emission factors (EF)

~~96.~~ 101. The table above introduces the following terms:

~~a.~~ (a) activity data, which typically corresponds to the quantity of fuel consumed. It may be expressed in energy units (e.g. MWh), volume (e.g. m³ or l) or mass (e.g. tonnes or kg.). These can be accessed by the undertaking by reviewing fuel purchase receipts~~,~~ or utility bills~~.~~

~~b.~~ (b) global warming potential, which ~~quantify~~ quantifies the ***impact*** of the given GHG on the climate compared to an equivalent unit of carbon dioxide~~;~~, and

~~c.~~ (c) emission factors (FE), quantifying how much GHG is emitted per unit of activity. The emission factors frequently take into account the GWP of the GHG, in which case the undertaking does not need to consider the latter.

~~97.~~ 102. The table below summarises ~~the~~ non-exhaustive sources where both emission factors (FE) and global warming potential (GWP) can be easily accessed by ~~the~~ undertakings. Undertakings may also refer to authoritative national sources that may be more relevant to their ~~situation~~circumstances.

Emission factors (FE)	ADEME – Base Empreinte® IPCC – Emissions Factor Database IPCC – Guidelines for National Greenhouse Gas Inventories Association of Issuing Bodies (AIB) – Residual Mix Grid Emission Factors JRC – Historical GHG emissions factor for electricity consumption Life-cycle electricity production emission factors USEPA GHG emission factors Hub Emission Factors and reference values published by the Government of Canada IEA's Annual GHG emission factors for World countries from electricity and heat generation (2022 data set, paid data set)
Global warming potential (GWP)	IPCC – Global Warming Potential

~~98.~~ 103. The undertakings can also find more guidance and tools on how to act and report on their GHG emissions and climate ***impacts*** by visiting https://smeclimatehub.org/.

Example of Scope 1 emission calculation

~~99.~~ 104. Company A burns Nr. 4 fuel oil in an industrial boiler. For its financial accounting, it keeps track of its costs, and for GHG accounting purposes, it keeps track of volumes (m³) as reflected in their fuel receipts. From the receipts, it determines the annual volumes of fuel oil bought, and it keeps track as well of the fuel oil inventory on the first calendar day of the year. In 2023 it purchased 100 m³ of fuel oil. Based on its records, on 1 January 2023 it had 2.5 m³ in its reservoirs, and on 1 January 2024 it had 1 m³. Thus, it determines (through purchase and measurement of inventory) that during 2023 it consumed 101.5 m³ of fuel oil.

~~100.~~105. Using the IPCC list of emissions factors (Table 2.3, page 2.18), it estimates its emission factor to be a fifty-fifty blend of diesel oil and residual oil as 75.75 t CO_2/TJ, and by using published statistics on energy, determine~~d~~ that its net calorific value of the fuel is 0.03921 TJ/m³. Given that the CO_2 GWP equal~~s~~ one, its CO_2 emission for this specific Scope 1 source is:

101.5 m³ * 0.03921 TJ/m³ * 75.75 t CO_2/TJ * 1 = 301.5 t CO_2

~~101.~~106. For the purpose of completeness ~~of~~ in this example, the CH_4 and N_2O emissions are also calculated. Checking the IPCC list of emission factors shows that~~,~~ these are, respectively, 3 kg of CH_4/TJ and 0.6 kg of N_2O/TJ, ~~thus~~ the emissions ~~will be~~thus being:

CH_4 emissions = 101.5 m³ * 0.03921 TJ/m³ * 3 kg CO_2/TJ * 29.8 = 0.36 tCO_2e

N_2O emissions = 101.5 m³ * 0.03921 TJ/m³ * 0.6 kg CO_2/TJ * 273 = 0.65 tCO_2e

~~102.~~107. As mentioned, CH4 and N2O emissions add around 1 tCO_2e to the CO_2 value of 301.5 tCO_2, which amounts to about 0.3% of the total. This could be considered well within an acceptable reporting error and so could not have been calculated and reported. Global Warming Potentials for CH_4 and N_2O are derived from the IPCC's Sixth~~6th~~ Assessment Report, Chapter 7SM[9].

Example of Scope 2 emission calculation

~~103.~~108. Company A occupies an office building of 2000 m² in Paris, where it pays the electricity consumed for the central heating and cooling, lighting, computers and other electric equipment such as appliances. With its utility bills, it has estimated that the building consumed 282 MWh of electricity in 2022. By using the emission factor provided by nowtricity.com for France in 2022, it has estimated its Scope 2 emissions for its building electricity consumption to be

$$Emissions_{GHG} = 282\,000\ [kWh] * 73\left[\frac{g\ CO_2eq}{kWh}\right] = 20.6\ \text{t}\ CO2_2eq$$

~~104.~~ Undertakings may also want to provide their market-based Scope 2 figures. Emission factors for market-based Scope 2 emissions reflect the contractual arrangements of the undertaking with its energy suppliers. Market-based emission factors can be provided by their electricity or heat suppliers as well as supported by their own purchase of Energy Attribute Certificates or Power Purchase Agreements (PPAs) or the use of residual-mix emission factors.

109.

~~Metric~~ B 4 – Pollution of air, water and soil

Guidance on which undertakings need to report on pollution and what pollutants ~~do~~ undertakings need to report on.

~~105.~~110. Paragraph 32 establishes that~~,~~ ~~if applicable,~~ the undertaking shall disclose the pollutants it emits to air, water and soil in its own operations if such information is already required to be reported by law to competent authorities or under an Environmental Management System. This means that the undertaking will~~,~~ first~~,~~ assess whether it already reports such information, either as a legal requirement or voluntarily. If it already reports information on pollutants emissions (or is legally required to do so), the undertaking will then provide further information on such emissions~~,~~ according to the requirements in paragraph 324. However, if the undertaking does not yet report such information (and is not legally required to do so), it is simply required to state this to be the case.

~~106.~~111. ~~To further clarify the point above, the metrics to be disclosed under this paragraph refer to information that the undertaking is already mandated to provide by law. This requirement was conceived to avoid any additional reporting burden on undertakings.~~ In general, this requirement is expected to apply to undertakings that are operators of an industrial installation or intensive livestock farm covered by the Industrial and Livestock Rearing Emissions Directive (IED 2.0),

[9] Smith, C., Z.R.J. Nicholls, K. Armour, W. Collins, P. Forster, M. Meinshausen, M.D. Palmer, and M. Watanabe, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity Supplementary Material. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change ([Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekci, R. Yu, and B. Zhou (eds.)]). Available ~~from~~ on https://www.ipcc.ch/.

amending the Industrial Emissions Directive (IED). The IED 2.0 applies to some 75,000 installations in Europe, covering activities such as burning fuel in boilers with rated power of more than 50 MW, founding in metal foundries, processing of non-ferrous metals, production of lime, manufacturing of ceramic products by firing, production of plant protection products or biocides, rearing of any mix of pigs or poultry representing 380 livestock units or more, tanning of hides, slaughterhouses, etc. In these cases, the installation must already report to the competent authority the pollutants released to air, water and soil, and the data is publicly available at the Industrial Emissions Portal Regulation (IEPR), replacing the European Pollutant Release and Transfer Register (E-PRTR). Companies that operate in more than one facility do not have to report on their consolidated company-wide emissions under the EPRTR, as they report only at facility level. This [draft] Standard requires the reporting of the total amount of pollutants of all the facilities. Similarly, companies owning but not operating in a facility do not have to report to the E-PRTR but are expected to reflect their facility-owned emissions in their sustainability report.

~~107.~~112. ~~-~~Likewise, if an undertaking has been identified as having to monitor and report on the pollutants listed in the E-PRTR under an Environmental Management System~~,~~ such as, for example, ~~an such as~~ an Eco-Management and Audit Scheme (EMAS) or ISO 14001 certification.~~,~~ T~~t~~hese are in principle relevant aspects for the undertaking to include in its sustainability report.

~~108.~~113. If an undertaking has only one facility or operates in only one facility, and if its pollution data is already publicly available, the undertaking may refer to the document where such information is provided instead of reporting it once again. Likewise, if the undertaking publishes an organisation-wide report~~,~~ such as, for example, an EMAS report ~~,~~that incorporates pollution data, it can include it in the sustainability report by reference.

~~109.~~114. To report information on pollutants in the sustainability report, the undertaking should indicate the type of pollutant material being reported alongside the amount emitted to air, water and soil in a suitable mass unit (e.g.~~,~~ t or kg).

~~110.~~115. Below can be found an example of how undertakings may present information on their emissions to air, water and soil divided by pollutant type.

Pollutant	Emissions (kg)	Medium of release (air, water, soil)
e.g.~~,~~ Cadmium and compounds	10	Water
Type of pollutant 2		
Type of pollutant 3		

~~111.~~116. As for the types of pollutants that need to be considered when reporting under paragraph 324, the undertaking may refer to the following main pollutants that are currently covered under EU law. Nevertheless, each undertaking shall consider the specific pollutants covered by the legislation in their respective jurisdictions.

~~112.~~117. Examples of key pollutants to air (Dir. 2024/299; Reg. 2024/1244; EC, 2024; EEA, 2022) are: sulphur oxides (Sox/SO2 – e.g.~~,~~ from energy generation and heating in manufacturing), nitrogen oxides (NOx/NO2 – e.g.~~,~~ from transport), non-methane volatile organic compounds (NMVOC – e.g.~~,~~ from agricultural activities), carbon monoxide (CO – e.g.~~,~~ from fossil fuel combustion), ammonia (NH3 – e.g.~~,~~ manure application and storage), particulate matter (PM10 – e.g.~~,~~ from combustion in manufacturing, transport, agricultural activities), heavy metals (Cd, Hg, Pb, As, Cr, Cu, Ni, Zn), POPs (total PAHs, HCB, PCBs, dioxins/furans), ozone-depleting substances or 'ODS' (chlorofluorocarbons 'CFCs', hydrochlorofluorocarbons 'HCFCs', halons), black carbon (BC – e.g.~~,~~ from energy consumption), etc.

~~113.~~118. ~~-~~According to the Guide ~~fF~~or Business on air pollutants emissions adopted by the Alliance for Clean Air, the major sources of emissions of air pollutants in the private sector (that are also highly impactful for the entire ***value chain***) include: (a) electricity generation from fossil fuel or biomass combustion (which may be done externally, distributed through a national grid, then consumed along the value chain activities); (b) direct stationary fossil fuel or biomass combustion within an undertaking's activities or industrial processes, or the operation of stationary machinery

or other activities that require fuel combustion; (c) transport (freight, road, rail, shipping and aviation, off-road vehicles such as those used in agriculture or construction); (d) industrial processes (all other emissions that ~~are~~ do not ~~stemming~~ stem from fuel combustion and that occur during industrial processes); (e) agriculture (livestock and manure management, crop production such as crop residue burning, manure and fertiliser application); (f) waste disposal (e.g.~~,~~ landfilling, incineration or open burning, or composting).

~~114.~~119. The Guide represents an example of a simple methodology for developing a company's air pollutant emission inventory and calculating the emissions of respective air pollutants. This methodology is divided into the following steps~~:~~, excluding the mapping of the ***value chain*** as under the VSME ~~S~~standard the information required ~~for~~ by this Disclosure Requirement is to be reported at the level of the reporting company: (1) identifying emission sources within the value chain~~;~~, (2) identifying methodologies for quantifying emissions~~;~~, (3) collecting activity data~~;~~ (4) identifying emissions factors, and~~;~~ (5) quantifying emissions. The guide provides a mapping of sources of pollution to methodologies for calculating information on emissions stemming from the main air pollutants (table below).

Sources of pollution	**Methodology for quantifying emissions** **(Section in the guidance)**
~~115.~~ Electricity	~~116.~~ Section 4,1
~~117.~~ Fuel combustion	~~118.~~ Section 4,2
~~119.~~ Transport	~~120.~~ Section 4,3
~~121.~~ Industrial processes	~~122.~~ Section 4,4
~~123.~~ Agriculture	~~124.~~ Section 4,5
~~125.~~ Waste	~~126.~~ Section 4,6

~~127.~~120. Below is an example of a calculation method for air pollutant emissions using the method for manufacturing taken from the Guide above. In the example considered~~,~~ Mp is the quantity of material M used in (or produced by) a company's ***value chain*** produced using process p (tonnes, litres); EFk,p is the emission factor for pollutant k for process p (g unit production-1); Emk,p are emissions of the specific pollutant k for process p (g).

$$Em_{k,p} = M_p * EF_{k,p}$$

~~128.~~121. For instance, a medium-sized chocolate manufacturer producing 1.750 tonnes of chocolate in 2022 would apply the default emission factor of 2 to calculate its emissions of NMVOCs, which would result in the following calculation:

1.750 tonnes of chocolate * 2 (emission factor of NMVOCs) = 3.500 tonnes of emissions of NMVOCs.

~~129.~~122. Transport may be another significant source of air pollution within own operations and at ***value chain*** level. In this case, to estimate the emission of a particular pollutant from road transport, for example, the entity will need to use the following formula, where~~:~~ FCv,f is the fuel consumption of vehicle type v using fuel f (kg); EFk,v,f is the emission factor for pollutant k for vehicle type v~~,~~ and fuel f (g vehicle-km-1); Emk,v,f represents the emissions of the specific pollutant k for vehicle type v~~,~~ and fuel f (g).

$$Em_{k,v,f} = FC_{v,f} * EF_{k,v,f}$$

~~130.~~123. For example, a light commercial vehicle (LCV) running on diesel that travelled a total of 2.800 km in 2022~~,~~ produced the following amount of PM10 emissions (PM10 emission factor of 1,52 g/kg):

2.800 km * 1,52 = 4.256 grammes of emissions of PM_{10}.

~~131.~~124. Fuel combustion is an additional critical source of air emissions. In this case an example of a formula may be the following, where~~:~~ FCn is the fuel n consumed within the source category (Gj); EFk is the emission factor for this pollutant k (g/Gj); and Emk are emissions of the specific pollutant k (g).

$$E_{mk} = FC_n * EF_k;$$

~~132.~~125. For example, a company consuming 3.000.000 grammes of fuel in 2020 will have an EF of 0,67 for SO2, resulting in:

3.000.000 * 0,67 = 2.010.000 grammes of emissions of SO_2. from fuel combustion in 2020.

~~133.~~126. Examples of key pollutants to water (Reg. 2024/1244; Dir. 2000/60/EC; Dir. 2006/118/EC; Dir. 91/676/EEC; Dir. 2010/75/EU; and ~~&~~ amendment Dir. 2024/1785; EEA, 2024) are: nitrogen (N), phosphorus (P), heavy metals (Cd, Hg, Pb~~,~~ as well as As, Cr, Cu, Ni, Zn), POPs and pesticides, BTEX (benzene, toluene, ethylbenzene, xylenes) and other Volatile Organic Compounds (VOCs), substances unfavourably influencing the oxygen balance (measured using parameters such as BOD, COD, etc.), total organic carbon (TOC), etc.

~~134.~~127. Pesticides and nutrients (e.g.~~,~~ N and P) may be released through agricultural activities (EEA, 2023; UNEP, 2023) (e.g.~~,~~ manure or inorganic fertiliser application). Heavy metal concentrations may stem from mining and wastewater discharges. TOC is a generic indicator of water contamination with organic matter which indicates the presence of living material, for example in wastewater, but also surface and groundwater (usual concentration levels of less than 10 mgl^{-1} and 2 mgl^{-1}~~,~~ ~~–~~respectively). COD widely indicates the presence of industrial effluents or sewage, with values that are typically lower than 20 mgl^{-1} in unpolluted waters and industrial wastewaters reaching values of up to 60.000 mgl^{-1}. BOD is normally used to determine pollution by organic matter in surface waters as well as for the efficiency of sewage treatment, and it usually features values around 2 mgl^{-1} in unpolluted waters and 10 mgl^{-1} and more in polluted waters. The release of VOCs can be the result of spills to water.

~~135.~~128. As for the methodology used to measure emissions to water, the EEA recommends a simple estimation technique~~,~~ similar to the one used for the afore-mentioned air pollutants. In the formula below~~,~~: ARa is the activity rate for activity a (to be chosen based on the specific activity or process; e.g.~~,~~ see Mp in the air emissions calculation above); EFp,a is the emission factor for pollutant p for activity a; and Emissionsp,a are emissions of the specific pollutant p for activity a.

$$Emissions_{p,a} = AR_a * EF_{p,a}$$

~~136.~~129. Examples of key pollutants emitted to soil (Reg. 2024/1244; Dir. 86/278/EEC) are: N, P, heavy metals (e.g.~~,~~ land application of ~~applications~~ sewage sludge), BTEX and other VOCs, POPs and pesticides.

~~137.~~130. Overall, the private sector sources of soil pollution are mainly the products or by-products of industrial processes (e.g.~~,~~ production of chemicals, energy, textiles manufacturing), accidental spills of petrol-derived products, livestock and agricultural activities (e.g.~~,~~ irrigation with untreated wastewater, poultry rearing), production and treatment of wastewater, production and processing of metals and minerals, and transportation (FAO, 2021).

~~138.~~131. Several national manuals have been developed to support companies in the calculation of their emissions to air, water and soil, For example, in Australia and South Africa entities are presented with a few estimation options to choose from, depending on their possibilities: direct measurement (e.g.~~,~~ sampling, continuous monitoring system), mass balance, engineering calculations, emission factors (same formula as above for air and water emissions), etc. The general approach to calculating such emissions is to: 1) identify the emission sources within the facility (combustion, manufacturing, solvent evaporation, storage, fugitive); 2) make a stock of the information available; 3) identify in the list of estimation methods the most suitable one for the specific process under evaluation, the information available, and the measuring tools that can be acquired to get the data that is needed; 4) gather the data required for each method; and 5) calculate emissions. The manuals provide several formulas and examples for each emissions' calculation method.

~~139.~~132. A list of emission factors for air pollutants can be found at the dedicated webpage of the EEA. Although emission~~s~~ factors are more commonly used for air pollution, certain ones for surface

water discharge and land disposal for specific processes were made available by the WHO. Additional emission factors for POPs may be consulted here.

~~140.~~133. It is to be noted that the requirements under paragraph 324 are only applicable to SMEs operating in specific sectors. Undertakings that are involved in the provision of services (e.g.~~,~~ operating in co-working or shared facilities~~,~~ or remotely), for instance, are typically not included in the scope of this disclosure. By contrast undertakings carrying out production activities (e.g.~~,~~ chemicals) generally have ***impacts*** in terms of pollution and are, therefore, expected to report under this disclosure. The table below (adapted from the EMAS User Guide) provides examples of sectoral impacts, including for office services, for which pollution-related aspects may not be significant.

Activity	Environmental aspect	Environmental impact
Transport	- consumed machine oils, fuel consumption - vehicle emissions - tyre abrasion (fine dust)	- **soil, water, air pollution** - greenhouse effect, noise
Construction	- primary raw material (resource) consumption - air emissions, noise, vibrations, etc. From construction machinery - land consumption	- raw material availability - noise, **soil, water, air pollution** - destruction of ground cover - biodiversity loss
Office services	- consumption of materials, (e.g.~~,~~ paper, toner) - electricity consumption (leads to indirect CO_2 emissions)	- generation of mixed municipal waste - greenhouse effect
Chemical industry	- primary raw material (resource) consumption - wastewater - emissions of volatile organic compounds - emissions of ozone-depleting substances	- raw material availability - **water pollution** - photochemical ozone - **destruction of the ozone layer**

Documentation Sources:

Data	*Documentation Source*
EMAS User Guide	https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_part1_0.pdf
A Practical Guide For Business: Air Pollutant Emission Assessment	https://www.ccacoalition.org/sites/default/files/resources/files/CCAC%20SEI%20-%20A%20Practical%20%20Guide%20For%20Business%20-%20Updated_Final%202023.pdf

Regulation (EU) 2024/1244 (IEPR)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401244
Directive 2010/75/EU (IED) & amendment in Directive (EU) 2024/1785 (IED 2.0)	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20110106 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202401785#d1e40-42-1
Calculating emissions to water – a simplified method	https://www.eionet.europa.eu/etcs/etc-icm/products/etc-icm-reports/calculating-emissions-to-water-a-simplified-method
Emission Estimation Technique Manual (Australia)	https://www.dcceew.gov.au/sites/default/files/documents/softdrink.pdf
A guide to reporting and estimating emissions for the integrated pollutant and waste information system	https://sawic.environment.gov.za/documents/297.pdf
EMEP/EEA air pollutant emission inventory guidebook 2023	https://efdb.apps.eea.europa.eu/?source=%7B%22query%22%3A%7B%22match_all%22%3A%7B%7D%7D%2C%22display_type%22%3A%22tabular%22%7D
Summary of techniques for estimating releases of chemicals from products (OECD)	https://www.oecd.org/content/dam/oecd/en/publications/reports/2017/01/resource-compendium-of-prtr-release-estimation-techniques-part-4-summary-of-techniques-for-estimating-releases-of-chemicals-from-products_a3b37c3f/29018220-en.pdf

Stand: 01.02.2026

~~Metric~~ B ~~5~~ – Biodiversity

Guidance on how to identify sites in or near biodiversity sensitive areas

~~141.~~ 134. Paragraph 3~~5~~ stipulates that the undertaking shall disclose the ***sites*** it operates in that are located in or ***near biodiversity sensitive areas***. Biodiversity sensitive areas are defined as such by special nature protection regulation at European or international level. These comprise areas belonging to the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs') as well as other protected areas designated as requiring special protection by governmental authorities (e.g. forest protected areas or areas lying within river basin districts).

~~142.~~ 135. To identify protected areas and ***biodiversity sensitive areas***, the undertaking may refer to databases such as the World Database on Protected Areas (WDPA) (a global database to help identify marine and terrestrial protected areas), the World Database on Key Biodiversity Areas, and the IUCN Red List of Threatened Species. The undertaking may also ~~refer to~~use tools~~,~~ such as the Integrated Biodiversity Assessment Tool (IBAT).

~~143.~~ 136. ~~***Near***~~ In the ontext of B5 – Biodiversity, the undshall o an area that is (partially) overlapping or adjacent to a ***biodiversity sensitive area***.

~~144.~~ 137. The following table shows how information on ***sites*** in or near ***biodiversity sensitive areas*** can be presented.

Location	**Area** (hectares)	**Biodiversity sensitive Area**	**Specification**

			(located in/near biodiversity sensitive areas)
Country – Site name 1			
Country – Site name 2			
Country – Site name 3			
...			

Documentation Sources:

Data	*Documentation Source*
Natura 2000 Network of protected areas	https://natura2000.eea.europa.eu/
Key Biodiversity Areas – IUCN	https://www.keybiodiversityareas.org/sites/search
UNESCO – World Heritage Centre	https://whc.unesco.org/en/list/

Stand: 01.02.2026

*Guidance on how to calculate and report land-**use***

~~145.~~138. A ***'sealed area'*** is to be understood as an area where the original soil has been covered (e.g.~~,~~ roads, buildings, parking lots), making it impermeable and resulting in an ***impact*** on the environment.

~~146.~~139. Green area or '***nature-oriented area***' is an area that primarily preserves or restores nature. Near natural/green areas may be located on the organisation's ***site*** and may include roofs, facades, water~~-~~drainage systems or other features designed, adapted~~,~~ or managed to promote biodiversity. Near-natural areas may also be located off the organisation~~'~~s site if they are owned or managed by the organisation and primarily serve to promote biodiversity.

~~147.~~140. When disclosing according to paragraph 3~~4~~6, the undertaking ~~should~~ shall not only consider local ***impacts***~~,~~ but also direct and indirect impacts on biodiversity (e.g.~~,~~ through raw material extraction, procurement, supply chain, production and products, transportation and logistics, and marketing and communications).

~~148.~~141. The following table shows how information on how ***land-use*** may be presented.

Land-use type	**Area** (hectares or m²)		
	Previous year	**Reporting year**	**% change**
Total sealed area			

Total nature-oriented area on-site			
Total nature-oriented area off-site			
Total use of land			

Documentation Sources:

Data	*Documentation Source*
EMAS Guidance	EU Commission Regulation 2018/2026 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R2026&rid=2 User's guide https://green-business.ec.europa.eu/document/download/98357f3d-f891-416e-81ea-a26f3ff3c61f_en?filename=PDF%20version%20C_2023_7207EN_annexe_acte_autonome_cp_part1_0.pdf

~~Metric~~ B ~~6~~ – Water

Guidance on how to calculate and report on water withdrawals and water consumption

~~149.~~142. ***Water withdrawal*** relates to the amount of water an undertaking draws into its organisational boundaries from any source during the reporting period. In practice, for most undertakings this relates to the amount of water taken from the public water supply network as indicated in the utility bills. However, where applicable, water withdrawal also includes amounts of water taken from other sources such as groundwater from own wells, water taken from rivers or lakes~~,~~ or water received by other undertakings. In the specific case of undertakings operating in agriculture, water withdrawal would include rainwater if collected directly and stored by the undertaking.

~~150.~~143. ***Water withdrawal*** data can be retrieved from measurements~~,~~ using flow meters or water bills; indeed, in practice~~,~~ for most undertakings water withdrawal relates to the amount of water taken from the public water supply network as indicated in the utility bills. In cases in which direct measurements are not feasible~~,~~ or are deemed not sufficient and therefore need to be complemented, data on water withdrawal can be estimated~~,~~ using, for example, calculations~~,~~ models, and industry standards.

~~151.~~144. ~~As an~~For example, in the case of a shared office or coworking space, a possible method to calculate the ***water withdrawal*** could be to retrieve the overall water withdrawal of the building from the water bill~~,~~ and calculate the water withdrawal per ***employee*** with the following equation:

Water withdrawal per employee daily (L) = annual water withdrawal (L) / (n. of employees in the whole shared building x n. of working days).

The undertaking could then multiply the water withdrawal per employee for the number of its employees and the days they worked in the reporting year to obtain the final number required in the datapoint.

To make a numerical example applying the proposed formula, the annual water withdrawal retrieved from the water bill of a coworking space is 1296 m3 (corresponding to 1296000 L), coworking space where 100 employees of different companies work together for an assumed number of 240 days a year. The assumption on the average number of days worked can be based on national statistics, for example. The water withdrawal per employee daily would be in this case:

wWater withdrawal per employee daily = 1296000 L / (100x240) = 54 L

152.145. Assuming now that that the ***employees*** of the reporting undertaking are 25, and that they use the coworking space for 220 days a year, the yearly ***water withdrawal*** of the undertaking in the coworking space would be the water withdrawal per employee multiplied for the number of its employees and the days worked, therefore 54Lx25x220 = 297000 L (corresponding to 297 m3).

153.146. This calculation could be useful when it i's possible to access to the water bill of the shared building. This simple calculation method has some limitations, as it does not consider, for example, differences in use between different parts of the building (e.g. a 7seven-floor building could have six6 floors dedicated to offices and one floor with a canteen or a restaurant), that which the undertaking might be able to overcome, if further additional data are available, further refining the basic calculation provided above as an example.

154.147. An alternative option way to obtain ***water withdrawal*** data in the example of shared offices, when it is not possible to retrieve the water bill, could be to calculate it using fixture flow rates and occupancy data as primary inputs. A possible formula could be:

Total water withdrawal =
∑(Flow Rate×Number of Uses per Day×Number of Days per Year×Occupancy)

where:

a) flow rates or each fixture can be retrieved from the project documentation or labels of the fixtures, for example, or estimated basing on average data publicly available, if more accurate information are is not retrievable;

b) the number of uses per day can be estimated basing based on averages publicly available;

c) 'number of days' stands for the number of operational days for the reporting undertaking in a year;

d) 'occupancy' represents the number of ***employees*** of the undertaking using the office; it' is often calculated as fFull-tTime eEquivalent (FTE); and

e) the sign ∑ indicates that the calculations for each fixture should be summed up to obtain the TTotal water withdrawal of the reporting undertaking operating in a shared office.

155.148. An additional possible additional source that could support the reporting of ***water withdrawal*** for undertakings operating in shared offices is the JRC Level(s) indicator 3.1: Use stage water consumption user manual and as well as additional related documents and calculation sheets (see PG Section Documents | Product Bureau (europa.eu)). Furthermore, the undertaking could consult EMAS Reference Document for the Public Administration sector and EMAS Reference Document for the Construction sector, as well as rating systems like the National Australian Built Environment Rating System (NABERS), and certifications like the Building Research Establishment Environmental Assessment Method (BREEM), the Leadership in Energy and Environmental Design (LEED) and the German Sustainable Building Council (DGNB) System for Buildings In Use, that which might provide useful indications in their methodologies on how to further refine the calculation for water withdrawal in offices and shared spaces.

156.149. The provided examples to obtain ***water withdrawal*** data in the case of shared offices can be transposed to and applied by undertakings operating in different sectors, with the adjustments that might be necessary for the sectoral and entity-specific situation the undertaking operates in. EMAS Sectoral Reference Documents (SRDs) could be consulted for sector-specific methodology and indicators on water withdrawal, as well as industry standards and benchmarks.

157.150. ***Water consumption*** is the amount of water drawn into the boundaries of the undertaking that is not discharged or planned to be discharged back into the water environment or to a third party. This typically relates to water evaporated – e.g., in thermal energy processes like drying or

power production – water embedded in products – e.g.~~,~~ in food production – or water for irrigation purposes – e.g.~~,~~ used in agriculture or for watering company premises.

~~158.~~151. Water discharge means, for example, the amount of water transferred directly to receiving water bodies such as lakes or rivers, the public sewer or to other companies for cascading water use. It can be seen as the water output of the undertaking.

~~159.~~152. ***Water consumption*** can therefore be calculated as:

Water consumption = Water Inputs – Water Outputs

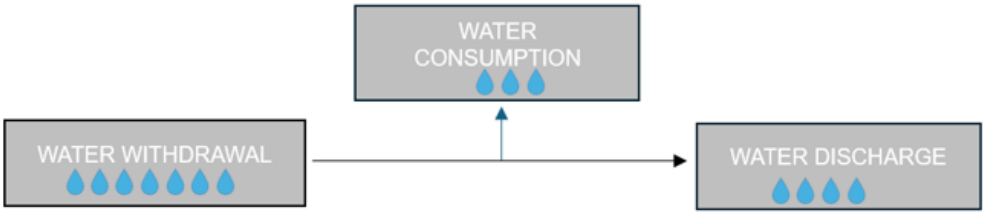
or in other words:

Water consumption = (Water withdrawal) – Water discharges.

For undertakings that solely withdraw water from the public water network and discharge it into the sewer, water consumption will be close to zero and can therefore be omitted from the report.

More broadly, the applicability of the disclosure requirement on water consumption relates to ~~the~~ information ~~being~~ already requested by law, already reported, and/or appropriate for the sector.

~~160.~~153. A schematic view of the relationship between ***water withdrawal***, ***water consumption*** and water discharge can be seen ~~here~~in the image below.~~:~~



~~161.~~154. The undertaking may provide additional explanatory information to contextualise its ***water withdrawal***s or consumption. For example, the undertaking may highlight if rainwater is collected and used as a replacement ~~of~~ for tap water or if water is discharged into other parties for cascading use.

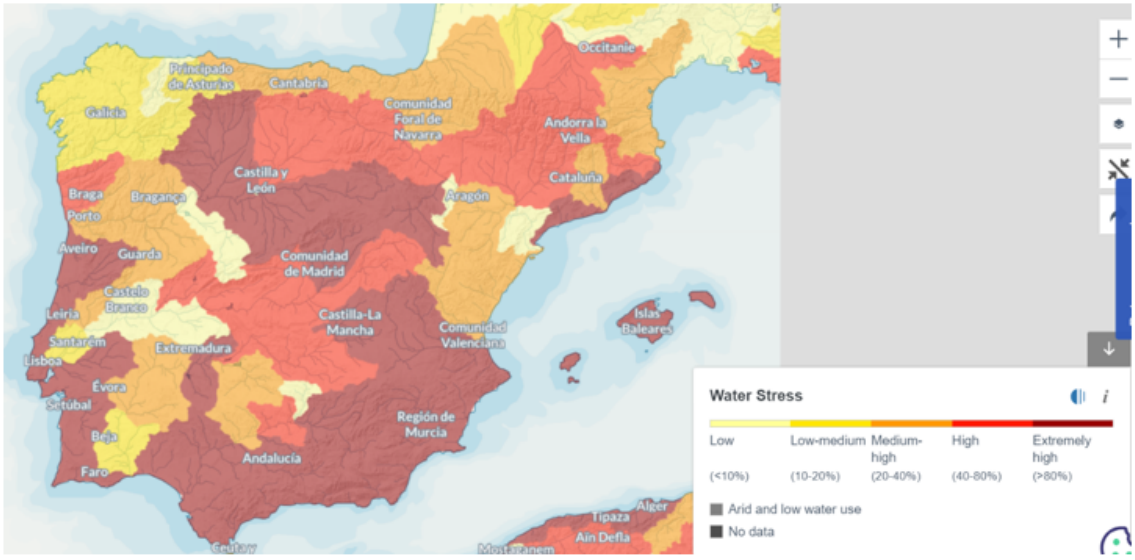
~~162.~~155. Below can be found an example of how undertakings may present quantitative information on their withdrawals, discharges and consumption of water divided by ***site*** location.

	Water withdrawal E.g.~~,~~ m³	**Water consumption** E.g.~~,~~ m³ (if applicable)
All sites		
Sites in areas with water stress		

Guidance for determining ~~if~~ whether the undertaking ***operates in an area of high-water stress***

~~163.~~156. The undertaking can consult local (e.g. national, regional) water authorities of the place(s) it operates in to inform its assessment of ~~the~~ water resources for the specific location(s), including the identification of areas of high-water stress. The undertaking can also consult publicly available and free tools that map out water scarcity globally. One such tool is the WRI's Aqueduct Water Risk Atlas, ~~that~~ which provides an interactive map of a water stress indicator (the 'baseline water stress', ~~that~~ which measures the ratio of total water demand to available renewable surface and groundwater supplies) at sub-basin level. With the help of this tool, undertakings can consult the water stress baseline set for different river basins globally. Values of the baseline water stress indicator above 40% indicate an area of ~~high water~~high-water stress.

~~164.~~157. By way of illustration, the map below shows the main Iberian River basins and their water stress classification according to the WRI Aqueduct.



In this image several water basins in the Iberian Peninsula, along with their water stress classification, can be observed. Most of the southern part of the peninsula sits in an area of significant high-water stress – with the exception of the Guadiana basin (in yellow). Thus, if the undertaking has operations within the Guadalquivir basin (e.g.~~,~~ the Andalucia region, which has a significant high-water stress level), the undertaking would have to disaggregate its ***water consumption*** for that region/water basin. But if its operations take place within the southern part of the Guadiana river basin (where there is low water stress), then it would not be necessary to disaggregate its water consumption for that region/water basin.

~~165.~~158. Other possible tools that undertakings can consult to determine their location in water stressed areas are the static map (and related dataset) provided by the European Environment Agency (EEA) Water Exploitation Index plus (WEI+) for summer and Urban Morphological Zones (UMZ) and the interactive map Water exploitation index plus (WEI+) for river basin districts (1990-2015), both presenting the water stress indicator WEI+~~,~~ that measures total ***water consumption*** as a percentage of the renewable freshwater resources~~,~~ at sub-basin level. WEI+ values equal or greater than 40% generally indicate situations of ~~high water~~high-water stress. It ~~i~~'s worth underlining that WRI Aqueduct bases its baseline water stress indicator on water demand, while the EEA indicator of water stress WEI+ is based on water consumption.

Documentation Sources:

Data	*Documentation Source*
Water withdrawal in shared offices (measurement)	'Water use in your business', South Staff Water
Water withdrawal in shared offices (measurement, estimation)	Level(s) indicator 3.1: Use stage water consumption user manual: introductory briefing, instructions and guidance (Publication version 1.1), JRC
Water withdrawal (general)	EMAS User Guide
Water withdrawal in SMEs	EMAS "easy" for small and medium enterprises

Water stress – WRI Aqueduct	Technical Note - Aqueduct 4.0: Updated decision-relevant global water risk indicators, WRI
Water stress – WEI+	Water scarcity conditions in Europe (Water exploitation index plus) | European Environment Agency's home page (europa.eu)

~~Metric~~ B 7 – Resource use, circular economy and waste management

Guidance on circular economy principles

~~166.~~159. When disclosing information on its products, material use and waste management, the undertaking may provide information in relation to ***circular economy principles***. Circular economy principles are articulated in the paragraphs below. The key principles outlined by the Ellen Macarthur Foundation are underlined below while the key principles considered by the European Commission are *italicised*.

Eliminate waste and pollution – this can be done through process improvements and also through design considerations at the level of *usability, reusability, repairability, disassembly* and *remanufacturing*.

Circulate products and materials (at their highest value) – *reusability* and ***recycling*** are key for product circulation, but this is enhanced if special consideration is given to circularity at the design phase for issues such as usability, reusability, repairability, remanufacturing and disassembly. Factors such as the incorporation of biomaterials and their *recirculation via the biological cycle* can also be considered, for example~~,~~ using biodegradable crop covers instead of plastics in agriculture.

Regenerate nature – whenever possible, human activities should seek to regenerate nature and improve or restore key ecological functions (i.e.~~,~~ drainage, habitat provision, thermal regulation, etc.) that may have been lost due to previous human activities.

Guidance on total waste generation and waste diverted to recycling or reuse

160. The requirements in paragraph 3~~8~~9 may be omitted by undertakings that generate only household waste. In such cases, the undertaking will only state that it generates this type of waste.

~~167.~~161. When reporting on ***hazardous waste*** according to paragraph 3~~8~~40 (a), the undertaking fulfils the requirements on ***radioactive waste*** of ~~the~~ indicator number 9 from Table #1 of Annex 1 of the Sustainable Finance Disclosure Regulation (SFDR)~~,~~[10]. This SFDR indicator (ratio between tonnes of radioactive and ***hazardous waste***) can be computed by using the numerator and denominator that the undertaking provides when reporting according to paragraph 3~~8~~40 (a).

~~168.~~162. SMEs must disclose hazardous and ***radioactive waste*** if their operations involve generating such waste. Applicability depends on the presence of hazardous or radioactive materials in business processes.

~~169.~~163. U~~The u~~ndertakings are recommended to classify their ***hazardous waste*** using the European Waste Catalogue (EWC), which categori~~z~~es waste by type. Any waste marked with an asterisk (*) is classified as hazardous in the EWC, normally with reference to 'containing hazardous ~~substances'~~substances'. For example:

(a) m~~M~~edical sector: contaminated sharps like needles and syringes used in medical settings (~~"~~wastes whose collection and disposal is subject to special requirements in order to prevent infection~~"~~ EWC Code 18 01 03*), cytotoxic and cytostatic medicines (EWC Code 18 01 08*),

[10] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

spent radiopharmaceuticals, and certain diagnostic equipment containing radioactive materials;

(b) mManufacturing sector: uUsed lubricants and oils classified as hazardous (EWC Code 13 02 05*);

(c) cConstruction sector: aAsbestos-containing materials (EWC Code 17 09 03*), soil and stones containing hazardous substances (EWC Code 17 05 03*), and

(d) Bbatteries and accumulators: lLead batteries (16 06 01*), Ni-Cd batteries (16 06 02*), batteries containing mMercury containing batteries (16 06 03*).

170.164. Nevertheless, a waste is considered hazardous if it displays one or more of the hazardous properties listed in Annex II of the Waste Framework Directive. For easier reference, there these are presented below together with the respective pictograms to help identify hazardous properties such as flammability, toxicity, and corrosiveness, which may lead to waste being classified as hazardous.

171.165. ***Radioactive waste*** also has or can have hazardous properties that render it hazardous, namely carcinogenic, mutagenic or toxic for reproduction. Nevertheless, radioactive substances are subject of to separate regulations within the EU[11]. Companies using radioactive materials with a the possibility ability to of generate generating radioactive waste subject to EU regulation will should be aware of it. Radioactive waste should be identified based on the presence of radionuclides at levels above regulatory clearance thresholds.

172.166. ***Radioactive waste*** can be present in a variety of situationsitems, such as medical, research and industrial equipment, smoke detectors, or sludges.

173.167. Hazard Pictograms for each hazard class are presented below:.

Hazard pictogram	Pictogram statement, symbol and class	What does it mean?
	**"Gas under pressure"** *Symbol: Gas cylinder* Physical Hazard	• Contains gas under pressure; may explode if heated • Contains refrigerated gas; may cause cryogenic burns or injury
	**"Explosive"** *Symbol: Exploding bomb* Physical Hazard	• Unstable explosive • Explosive; mass explosion hazard • Explosive; severe projection hazard • Explosive; fire, blast or projection **hazard** • May mass explode in fire

[11] EU's Radioactive Waste and Spent Fuel Management Directive (2011/70/Euratom). For more information check see the EU's webpage on Radioactive Waste and spent fuel.

Annex 9: Changes agreed by the EFRAG SRB on the SR TEG approved version of the VSME

	**"Oxidising"** *Symbol: Flame over circle* Physical Hazard	• May cause or intensify fire; oxidiser. • May cause fire or explosion; strong oxidiser.
	**"Flammable"** *Symbol: Flame* Physical Hazard	• Extremely **flammable gas** • Flammable gas • Extremely flammable aerosol • Flammable aerosol • Highly flammable liquid and vapour • Flammable liquid and vapour • Flammable solid
	**Corrosive** *Symbol: Corrosion* Physical Hazard / Health Hazard	• May be corrosive to metals • Causes severe skin burns and eye damage
	**"Health hazard/Hazardous to the ozone layer"** *Symbol: Exclamation mark* Health Hazard	• May cause respiratory irritation • May cause drowsiness or dizziness • May cause an **allergic skin reaction** • Causes serious eye **irritation** • Causes skin irritation • Harmful if swallowed • Harmful in contact with skin • Harmful if inhaled • Harms public health and the environment by destroying ozone in the upper atmosphere

	**"Acute toxicity"** *Symbol: Skulls and Crossbones* Health Hazard	• Fatal if swallowed • Fatal in contact with skin • Fatal if inhaled • Toxic: if swallowed • Toxic in contact with skin • Toxic if inhaled
	**"Serious health hazard"** *Symbol: Health Hazard* Health Hazard	• May be fatal if swallowed and **enters airways** • Causes **damage to organs** • May cause damage to organs • May damage fertility or the unborn child • Suspected of damaging fertility or the unborn child • May cause cancer • Suspected of causing cancer • May cause **genetic defects** • Suspected of **causing genetic defects** • May cause allergy or asthma symptoms or breathing difficulties if inhaled
	**"Hazardous to the environment"** *Symbol: Environment* Environmental Hazard	• Very toxic to aquatic life with long-lasting **effects** • Toxic to aquatic life with long-lasting effects

Pictograms that indicate hazardous properties, Annex V, from the Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008

~~174.~~168. When presenting information on its waste generation or diversion from disposal, the undertaking should preferably report such information in units of weight (e.g.~~,~~ kg or tonnes). Nevertheless, should ~~it~~ the units of weight be considered an inappropriate unit by the undertaking, they may alternatively disclose the afore-mentioned metrics in volumes (e.g.~~,~~ m3) instead.

~~175.~~169. When disclosing information on the total annual waste diverted to ***recycling*** or reuse, the undertaking should consider the waste that is sorted and sent to recycling or reuse operators (e.g. the~~,~~ amount of waste put into recycling container~~,~~ or sorting of waste into certain categories of

materials and their delivery to waste treatment facilities)~~,~~ rather than the waste that gets effectively recycled or reused.

~~176.~~170. When disclosing information on waste, the undertaking may adopt the following tables.

	Waste generated (e.g.~~,~~ tonnes)		
	Total waste generated, of which:		
		Waste diverted to recycle or reuse	*Waste directed to disposal*
Non-hazardous waste			
Type of waste1			
Type of waste2			
...			
Hazardous waste			
Type of waste1			
...			

~~177.~~171. Examples of ***hazardous wastes*** that small businesses may generate include batteries, used oils, pesticides, mercury-containing equipment and fluorescent lamps.

~~178.~~172. The undertaking may provide further breakdowns specifying further types of non-hazardous and ***hazardous wastes***. In doing so, it may consider the list of waste descriptions found in the European Waste Catalogue's social metrics.

Guidance on the annual mass-flow of relevant materials used

~~179.~~173. The annual mass-flow is an indicator aligned with the EMAS requirements on efficiency of material consumption, and it illustrates an undertaking's dependency on specific materials in its operations (e.g.~~,~~ wood and steel for the construction industry). The undertaking is here required to provide information on the materials it uses, including both the materials acquired from suppliers and those sourced internally from production. To compute the annual mass-flow of the relevant materials it has used, the undertaking will need to first identify the specific key materials on which its operations are dependent and for which material efficiency needs to be evaluated (e.g.~~,~~ material efficiency of wood). If different types of materials are used, the undertaking will need to provide separately the annual mass-flow (i.e.~~,~~ total weight for each relevant material used~~,~~ e.g.~~,~~ tonnes of wood purchased) for each key material in an appropriate manner, for example by breaking it down by the use to which they are put (EMAS, 2023). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products~~,~~ or others (excluding energy sources and water)~~,~~ and provide the total weight for each relevant material used (e.g.~~,~~ tonnes of wood purchased). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products, or others (excluding energy sources and water).This indicator is to be preferably expressed in units of weight (e.g.~~,~~ kilograms or tonnes), volume (e.g.~~,~~ m³) or other metric units commonly used in the sector.

Guidance on how to identify manufacturing, constructions and /or packaging processes

~~180.~~ 174. To identify manufacturing, construction and/or packaging processes, the undertaking may refer to the activities that fall under "Section C – Manufacturing", Section F – "Construction" as well as Class "N82.92 'Packaging activities'" of Annex I to Regulation (EC) No 1893/2006.[12]

Basic Module Guidance — Social Metrics

~~Metric~~ B 8 – Workforce – General characteristics

~~181.~~ 175. Full-time equivalent (FTE) is the number of full-time positions in an undertaking. It can be calculated by dividing an ***employee***'s scheduled hours (total effective hours worked in a week) by the employer's hours for a full-time workweek (total hours performed by full-time employees). For example, an employee who works 25 hours every week for a company where the full-time week is 40 hours represents a 0,625 FTE (i.e. 25/ 40 hours).

~~182.~~ 176. Headcount is the total number of people employed by the undertaking at a given time.

Guidance on how to present information about employees' contract types

~~183.~~ 177. The following table shows how information on ***employees*** may be presented by type of employment contract.

Type of contract	Number of employees (headcount or full-time equivalents)
Temporary contract	
Permanent contract	
Total employees	

~~184.~~ 178. The following table shows how information on ***employees*** may be presented by gender.

Gender	Number of employees (headcount or full-time equivalents)
Male	
Female	
Other	
Not reported	
Total employees	

~~185.~~ 179. In some European Union Member States, it is possible for people to legally register themselves as having a third gender, often neutral, which is to be categorised as "other" in the table above. If the undertaking is disclosing data about ***employees*** where this is not possible, it may explain this and indicate that the "other" category is not applicable. The "not reported" category applies to employees who do not disclose their gender identity.

~~186.~~ 180. The following table shows how information on ***employees*** may be presented by countries.

Country (of employment contract)	Number of employees (headcount or full-time equivalents)
Country A	
Country B	
Country C	
Country D	
Total employees	

~~187.~~ 181. Definitions and types of employment contracts may vary depending on the country. If the undertaking has ***employees*** working in more than one country, it shall use the legal definitions stipulated in the national laws of the countries where the employees are based in to calculate country-level data. Such country-level data shall then be added up to calculate total numbers, disregarding differences in national legal definitions.

[12] L_2006393EN.01000101.xml (europa.eu).

~~188.~~182. ***Employee*** turnover refers to employees who leave the organis~~z~~ation voluntarily or due to dismissal, retirement~~,~~ or death in service.

~~189.~~183. In order to calculate the ***turnover*** rate, the formula below should be used.~~:~~

$$\frac{Number\ of\ employees\ who\ left\ during\ the\ reporting\ year}{Average\ number\ of\ employees\ during\ the\ reporting\ year}\ x\ 100$$

~~Metric~~ B~~-~~9 – Workforce – Health and safety

Guidance on the rate of recordable work-related accidents

~~190.~~184. Based on the assumption that one full-time worker works 2,000 hours per year, the rate indicates the number of work-related accidents per 100 full-time workers over a yearly time frame. If the undertaking cannot ~~directly~~ calculate directly the number of hours worked, it may estimate this on the basis of normal or standard hours of work.

~~191.~~185. In order to calculate the rate of ***recordable work-related*** accidents ~~for~~ of ***employees***, the formula below should be used.~~:~~

$$\frac{Number\ of\ work\ related\ accidents\ in\ the\ reporting\ year}{Total\ number\ of\ hours\ worked\ in\ a\ year\ by\ all\ employees}\ x\ 200{,}000$$

Example

~~192.~~186. Company A reported three work-related accidents in the reporting year. Company A has 40 ***employees***, and a total number of 80,000 hours (40 x 2,000) worked in a year.

The rate of ***recordable work-related*** accidents is 3/80,000 x 200,000 = 7.5.

Guidance on the number of fatalities resulting from work-related injuries and work-related ill health

~~193.~~187. Work-related injuries and work-related ill health arise from exposure to dangers at work.

~~194.~~188. In case of teleworking, injuries and ill health are work-related if the injury or ill health is directly related to the performance of work rather than the general home environment.

~~195.~~189. In case of injuries and ill health that occur while a person is travelling for work, these are considered work-related if the ***employee*** was performing work activities in the interest of the employer at the time of the injury or ill health. Accidents taking place when travelling, outside of the undertaking's responsibility (i.e.~~,~~ regular commuting to and from work), are subject to the applicable national legislation, which regulates their categorisation as to whether they are considered work-related or not.

~~196.~~190. Mental illness is considered work-related if it has been notified voluntarily by the relevant worker and if an evaluation from a licensed healthcare professional stating that the illness in question is indeed work-related has been issued and notified, too. Health problems resulting from smoking, drug and alcohol abuse, physical inactivity, unhealthy diets~~,~~ and psychosocial factors not connected to work are not considered work-related.

~~197.~~191. The undertaking may present separately ~~the~~ fatalities resulting from work-related injuries and those resulting from work-related ill health.

~~Metric~~ B~~-~~10 – Workforce – Remuneration, collective bargaining and training

Guidance on remuneration: minimum wage

~~198.~~192. 'Minimum ***wage***' refers to the minimum compensation of employment per hour~~,~~ or another unit of time. Depending on the country, the minimum wage might be set directly by law or through ***collective bargaining*** agreements. The undertaking shall refer to the applicable minimum wage for the country it reports on.

~~199.~~193. For the lowest ***pay*** category, excluding interns and apprentices, ~~the~~ minimum ***wage*** serves as the foundation for calculating ~~the~~ entry-level wage. Therefore, ~~the~~ entry-level wage includes ~~the~~

pay equal to ~~the~~ minimum wage as well as any additional fixed payments guaranteed to ***employees*** in that category.

*Guidance on remuneration: percentage gap between female and male employee**es***

~~200.~~194. The metric for the percentage gap between female and male ***employees*** addresses the principle of gender equality, which stipulates equal ***pay*** for equal work. The pay gap is defined as the difference of average pay levels between female and male employees expressed as the percentage of the average pay level of male employees.

~~201.~~195. In order to estimate this metric, all ***employees*** shall be included in the calculation. In addition, there should be two separate average ***pay*** calculations for female and male employees. See the formula below:

$$\frac{(Average\ gross\ hourly\ pay\ level\ of\ male\ employees - average\ gross\ hourly\ pay\ level\ of\ female\ employees)}{Average\ gross\ hourly\ pay\ level\ of\ male\ employees} x\ 100$$

~~202.~~196. Depending on the undertaking's remuneration policies, ~~the~~ gross ***pay*** refers to all of the following elements:

(a) base salary, which is the sum of guaranteed, short-term, ~~and~~ non-variable cash compensation;

(b) benefits in cash, which constitute the sum of the base salary and cash allowances, bonuses, commissions, cash profit-sharing~~,~~ and other forms of variable cash payments;

(c) benefits in kind such as cars, private health insurance, life insurance~~,~~ and wellness programs; and

(d) direct remuneration, which is the sum of benefits in cash, benefits in kind and the total fair value of all annual long-term incentives.

~~203.~~197. The gross ***pay*** is the sum of all the applicable elements listed above.

~~204.~~198. The average gross hourly ***pay*** is the weekly/annual gross pay divided by the average hours worked per week/year.

Example

~~205.~~199. Company A has *X* male ***employees*** and *Y* female employees in total. Male employees' gross hourly ***pay*** is €15 and female employees' gross hourly pay is €13.

~~206.~~200. The average gross hourly ***pay*** level of male ***employees*** is the sum of all their gross hourly payments divided by the total number of male employees. The average gross hourly pay level of female employees is the sum of all their gross hourly payments divided by the total number of female employees.

~~207.~~201. The formula used to calculate the percentage ***pay*** gap between male and female ***employees*** is

$$\frac{15 - 13}{15} x\ 100 = 13.3\%$$

Guidance on collective bargaining coverage

~~208.~~202. The ***employees*** covered by ***collective bargaining*** agreements are those individuals to whom the undertaking is obliged to apply the agreement. If an employee is covered by more than one collective bargaining agreement, it only needs to be counted once. If none of the employees are covered by a collective bargaining agreement, the percentage is zero.

~~209.~~203. The percentage of ***employees*** covered by ***collective bargaining*** agreements is calculated by using the following formula~~.~~:

$$\frac{Number\ of\ employees\ covered\ by\ collective\ bargaining\ agreements}{Number\ of\ employees}\ x\ 100$$

~~210.~~204. The information required by this disclosure requirement may be reported as coverage rates if the ***collective bargaining*** coverage is between 0-~~–~~19%, 20-~~–~~39%, 40-~~–~~59%, 60-~~–~~79% or 80-~~–~~100%.

~~211.~~205. This requirement is not aimed at obtaining the percentage of ***employees*** represented by a works council or belonging to trade unions, which can be different. The percentage of employees covered by ***collective bargaining*** agreements can be higher than the percentage of unionised employees when the collective bargaining agreements apply to both union and non-union members.

Basic Module Guidance ~~–~~ Business Conduct Metrics

~~Metric~~ B ~~1~~1 – Convictions and fines for corruption and bribery

~~212.~~206. ***Corruption*** and bribery fall under the ***business conduct*** sustainability ~~matter~~issue.

~~213.~~207. Under paragraph 4~~35~~, the undertaking shall report on the total number of convictions and the total amount of fines incurred for violating anti-corruption and anti-bribery laws.

Guidance on convictions

~~214.~~208. Convictions for the violation of anti-corruption and anti-bribery laws refers to any verdict of a criminal court against an individual or undertaking in respect of a criminal offence related to ***corruption*** and bribery,- ~~F~~for example~~,~~ where these court decisions are entered in the criminal record of the convicting European Union Member State.

Guidance on fines

~~215.~~209. Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-corruption and anti-bribery laws imposed by a court, commission or other government authority, which are paid to a public treasury.

Comprehensive Module: Guidance

216.210. The guidance below is intended as part of an ecosystem that will include also the development of further implementation guidance by EFRAG, further digital tools and implementation support (educational activities, stakeholders' engagement and so forth), that aimaiming at to facilitating facilitate some of the technical elements present in the guidance.

211. This guidance is intended to support the preparation of the metrics in the Comprehensive Module.

Comprehensive Module Guidance – Cross-cutting Metrics

C-1 – Strategy: Business Model and Sustainability – Related Initiatives

212. When describing the main ***consumers*** and supplier relationships under paragraph 4725 (c), the undertaking shall disclose the estimated number of suppliers, and their related sectors and geographies (i.e. countries).

C-2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

213. Undertakings may use the following template to report on C2 datapoints.

	If you answered YES to existing practices/policies/ future initiatives in disclosure B2, please briefly describe them along with their consequent actions. (In case the practice/ policy or future initiative covers suppliers or clients, the undertaking shall mention it)	If you answered YES to future initiatives/ targets in disclosure B2, please specify them.	You may indicate the highest senior level in the undertaking accountable for implementing them [if any]
Climate Change			
Pollution			
Water and Marine Resources			
Biodiversity and Ecosystems			
Circular Economy			
Own Workforce			
Workers in the Value Chain			
Affected Communities			
Consumers and end-users			

Business conduct	-		-

~~217.~~

Comprehensive Module Guidance — Environmental Metrics

~~Entity-specific c~~Consideration when reporting on GHG emissions under B-3 (Basic Module)

214. When determining ~~if~~ whether disclosure of Scope 3 is appropriate following paragraph 50~~49~~, the undertaking may screen its total Scope 3 GHG emissions based on the 15 ~~s~~Scope 3 categories identified by the GHG Protocol using appropriate estimates and report by incorporating this information by reference. This allows for ~~to~~the ~~identify~~ identification and ~~disclose~~ disclosure of its significant Scope 3 categories based on the magnitude of their estimated GHG emissions and other criteria provided by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, p. 61 and 65-68) or EN ISO 14064-1:2018 Annex H.3.2, such as financial spend, influence, related transition risks and opportunities or stakeholder views.

——SMEs operating with manufacturing, agrifood, real estate construction and~~/or~~ packaging processes are likely to have ~~relevant~~ significant Scope 3 categories (CDP, 2024), which may be considered relevant for reporting in the undertaking's sector.

~~218.~~215.

~~Disclosure~~ C~~-~~3~~1~~3 – GHG reduction and climate transition

~~219.~~216. Emission~~s~~ reductions can prove to be both a challenge and opportunity for an undertaking, as it often requires changes to the strategic and operational reality of the business. The goal of reducing emissions may require a review of strategic and financial priorities. Decarbonisation may require important initial investment ~~to~~in, for example, ~~electrify~~ electrifying a fleet of vehicles, implementing new technologies to reduce energy consumption~~,~~ or developing new product lines that are less reliant on carbon-intensive materials. On the other hand, implementing low-carbon solutions to achieve GHG emission reduction can significantly lessen the costs of purchased energy and materials. Undertakings embarking on their decarbonisation journey are often facing important adjustments to their business models or daily operations. For instance, a logistics and delivery services undertaking may need to redesign its fleet management to minimise potential service disruptions due to the need of regular vehicle charging. A consumer goods manufacturing undertaking planning to replace a component of its product with a sustainable, low-carbon alternative may need to allocate time and resources to product innovation and to searching ~~a search~~ for new suppliers. These efforts can, in turn, result in reducing costs, accessing new markets, creating new workplaces and attracting additional financing, making GHG emission reduction not only a challenge~~,~~, but also a strategic business opportunity. In this context, ***targets*** for GHG reductions ~~is~~are an important measure of responding to the ~~need of~~for a sustainable transition, as ~~it~~ they allow~~s~~ undertakings to manage the change in a systematic, controlled and organised way.

~~220.~~217. A GHG emission reduction target is a commitment to reduce the undertaking's GHG emissions in a future year compared to the GHG emissions measured during a chosen base year. ***Actions*** that may lead to emission reductions include, for instance, electrification, renewable electricity, sustainable products development, etc. Disclosure C~~-~~3 requires that the undertaking ~~to~~ disclose GHG emission reduction ***targets*** for its Scope 1 and Scope 2 emissions.

~~221.~~218. Removals and avoided emissions shall not be accounted as reduction of the undertaking's gross GHG emissions. This is due to the important distinction between accounting practices for gross GHG emissions (inventory accounting) and GHG removals and avoided emissions (project-based~~,~~ or intervention accounting). Gross GHG emissions of the undertaking are designed to track the actual emissions released to the environment, providing a consistent and comparable baseline to set up GHG ***targets***. Avoided emissions and carbon removals, on the other hand, relate to specific project activities of the undertaking, which ~~signifies~~ means that their accounting is done separately from gross GHG emissions.

~~222.~~219. To follow this practice, the undertaking need~~s~~ to distinguish between its gross GHG emissions and other ***impacts*** which are not captured ~~within~~ in it, such as GHG removals and

avoided emissions. Removals refer to the withdrawal of GHG from the atmosphere as a result of deliberate human activities. Examples of such activities can include plant growth (transfer of atmospheric CO_2 through photosynthesis), or and direct air capture of CO_2, and are typically linked to the subsequent storage of CO_2. Avoided GHG emissions are typically referred to as emissions that would have otherwise happened, but that, as a result of the undertaking's activities, did not happen. These may include introducing new products and technologies that reduce demand for their carbon-intensive equivalents, for example, insulation solutions in a building that avoid the demand for energy services therein. More information on the concepts related to carbon removals and avoided emissions can be found in the GHG Protocol Land Sector and Removals Guidance[13], as well as the WBCSD guidance[14].

223.220. A base year is a preceding year against which the undertaking's current GHG emissions can be measured. In general, the base year should be a recent and representative year of the undertaking's GHG emissions in which there are verifiable data.

224.221. The target year is the year in the future in which the undertaking aims to achieve a certain absolute or percentage amount of GHG emission reductions. It should range over a period from one to three years from the base year to a short-term target. Longer term ***targets*** may also be included, for instance, for periods of twenty or thirty years (e.g., 2040 or 2050). Undertakings are encouraged to include target values for the short-term target year of 2030 at the least and, if feasible, for the long-term year of 2050. From 2030 onwards, it is recommended to update the base year and target year for GHG emission reduction targets after every five-year period.

225.222. To set a target, undertakings should consider the existing scientific evidence on GHG mitigation. The SBTi recommends a cross-sector target in GHG emissions reduction of -42% by the year 2030 and -90% by the year 2050 (base year 2020). The Stockholm Resilience Centre also proposes a 'carbon law' that sets out concrete steps to achieve full decarbonisation by 2050 based on a flexible way to thinkof thinking about reducing carbon emissions by halving emissions every decade and increasing ***renewable energy*** roll-out exponentially. The authors argued that this roadmap would ensure a 75% chance of keeping the Earth below 2°C above pre-industrial temperatures –, –the target set out in the Paris agreement[15]. SBTi also proposes a streamlined target-setting route for small- and medium-sized undertakings[16]. Specific pathways also exist by sector and may be considered by undertakings when setting their GHG emission reduction ***targets***.

226.223. To achieve a quick reduction of both direct and indirect emissions, there are some simple ***actions*** that the undertaking can take. Some actions may be easy but still able to deliver a notable emission reduction and support the undertaking reaching its ***targets***. For instance, electrification of the vehicle fleet by replacing vehicles running on fossil fuel with electric vehicles will lead to emissions reduction as soon as the previous fleet is replaced. This can mean notable emission reductions especially for a business that is reliant on transportation. Similarly, replacing commutes and business travels by car with low carbon alternatives, such as using bicycles or public transport, is an effective, simple and achievable decarbonisation action. Another area of low–hanging fruit is to review the internal energy management and update it to energy–efficient equipment and integrate maintenance into the routine business operations. By regularly maintaining equipment and machinery and replacing these with more energy–efficient alternatives when and where possible, the undertaking can reduce its energy consumption. Such equipment can include, for example, boilers, telecommunication systems, heat pumps, air-conditioning etc. Through regular maintenance their efficient operation can be ensured, wear and tear minimised and waste

[13] GHG Protocol Land Sector and Removals Guidance (https://ghgprotocol.org/land-sector-and-removals-guidance)

[14] World Business Council for Sustainable Development (2023), Guidance on Avoided Emissions. (https://www.wbcsd.org/wp-content/uploads/2023/09/Climate-Avoided-Emissions-guidance_WBCSD.pdf).

[15] Rockström, J., Gaffney, O., Rogelj, J. et. al. 2017. A roadmap for rapid decarbonization. Science, Volume 355 Issue 6331. Available at: https://www.stockholmresilience.org/research/research-news/2017-03-23-curbing-emissions-with-a-new-carbon-law.html.

[16] SBTI https://sciencebasedtargets.org/small-and-medium-enterprise-sme-target-setting-process. SBTI offers resources for SMEs to set science based targets: https://sciencebasedtargets.org/small-and-medium-enterprise-sme-target-setting-process.

minimised. By also automating systems and using timers to define periods of use, the undertaking is able to lower the emissions of such equipment even further.

~~227.~~224. A climate transition plan for climate change mitigation is a set of present and future ***actions*** meant to align the undertaking's business model, strategy and operations with the key overarching global goal of limiting global warming to 1.5°C. Underpinned by a GHG reduction target compatible with that goal, the importance of having a transition plan in place lies in the ability of understanding the means by which the undertaking will move towards a low-carbon economy while keeping track of the progress made. A transition plan serves as a mechanism for accountability and transparency, prompting undertakings to develop credible pathways for mitigating climate change through their actions.

225. Establishing a credible transition plan ~~of~~ for the undertaking is something that should be supported by elements such as *(a)* identifying clear responsibilities and roles; *(b)* integrating the plan into the undertaking's business strategy and financial planning; *(c)* including information on decarbonisation levers and pathways as well as quantifiable indicators that can be monitored throughout predefined timeframes; *(d)* allowing for regular reviewing and updating after stakeholder consultations when appropriate; and *(e)* covering the entirety of its own operations and, to the largest possible extent, the ***value chain*** or else ~~provide~~ providing an explanation as to any limitation.

~~228.~~226. Undertakings that are disclosing ***targets*** according to the EMAS Regulation Annex IV B (d) may use its GHG reduction targets to fulfil the VSME requirement if it has set such targets. The undertaking may also support this disclosure through its implementation of the EMAS environmental management system and link to EN ISO 14001:2015 as set out by EMAS Regulation Annex II B A.6.2.1 and B.5 (environmental objectives).

Guidance on how to identify manufacturing, constructions and /or packaging processes

~~229.~~227. To identify manufacturing, construction and/or packaging processes, the undertaking may refer to these activities that fall under ~~"~~Section C – Manufacturing~~"~~, Section F ~~"~~Construction~~"~~ as well as Class ~~"~~N82.92 'Packaging activities'~~"~~ of Annex I to Regulation (EC) No 1893/2006.

~~Disclosure~~ C ~~4~~24 – ~~Physical~~ Climate risks ~~from climate change~~

228. ***Climate-related ~~physical risks~~hazards*** are drivers of climate-related physical risks that arise from the effects that climate change has on the undertaking. They can be classified into acute ~~physical risks~~hazards, which arise from particular events (such as droughts, floods, extreme precipitations and wildfires), and chronic ~~physical risks~~hazards (such as changing temperatures, sea level rise and soil erosion), which arise from longer~~-~~term changes in the climate (Commission delegated regulation 2021/2139). Physical risks are a function of climate-related hazards, the exposure of the undertaking's assets and activities to these hazards, and how sensitive the undertaking is to these hazards~~ are~~. Examples of climate-related hazards are heat waves, increased frequency of extreme weather events, sea level rise, glacial lake outburst flood~~,~~ and change in precipitation and wind patterns. Climate-related physical risks can be identified and modelled by using climate scenarios that consider high emissions trajectories such as IPCC SSP5-8.5.

229. ***Climate-related transition events*** may be (according to TNFD classification) policy- and legal-based (e.g.~~,~~ enhanced emission~~s~~ reporting obligations), technology-based (e.g.~~,~~ costs of transition to lower emissions technology), market-based (e.g.~~,~~ increased cost of raw materials)~~,~~ and reputation-based (e.g.~~,~~ increased stakeholder concern).

~~—~~***Gross climate-related risks*** refer to gross physical risks and gross transition risks that may result from ~~the~~ exposure of the undertaking's assets and business activities to climate-related hazards.

~~—~~

~~—~~

230.

Comprehensive Module Guidance ~~—~~ Social Metrics

~~Disclosure~~ C ~~5~~35 – ~~Workforce (General) Additional characteristics~~Additional (general) workforce characteristics

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~~230.~~231. To ~~find~~ determine the gender ratio, divide the number of female ***employees*** by the number of male employees at management level. This will ~~give you~~yield the proportion of women to men in your company.

$$Gender\ ratio = \frac{number\ of\ female\ employees\ at\ management\ level}{number\ of\ male\ employees\ at\ management\ level}$$

~~231.~~232. Management level is considered the level below the board of directors unless the undertaking has a specific definition to use.

233. For example, if there are 28 female ***employees*** and 84 male employees at management level, the gender ratio would be 1:3, meaning that for every woman at management level, there are three men.

234. Relevant factors for a undertaking to consider in deciding whether or not to disclose the number of self-employed workers and temporary workers under paragraph 602 would be: (1) the ratio of ***employees*** to self-employed and temporary workers, especially in case of significant and/or increasing reliance **or** (2) when the risk of negative social ***impacts*** on self-employed or temporary workers is greater compared to the ~~company's~~undertaking's own employees.

~~232.~~

~~233.~~235. The following table shows how information on self-employed people without personnel that are working exclusively for the undertaking and temporary workers provided by undertakings primarily engaged in employment activities may be presented.

Types of workers	Number of self-employed people and temporary workers engaged in employment activities
Total self-employed without personnel that are working exclusively for the undertaking	
Total temporary workers provided by undertakings primarily engaged in employment activities	

~~234.~~236. Undertakings can refer to NACE Code N78 for temporary workers provided by undertakings primarily engaged in "~~"~~employment activities~~"~~".

~~Disclosure~~ C~~-~~646 – Human rights policies and processes

~~235.~~237. Undertakings that have a due diligence process for human rights in place should answer positively (YES) and should clarify the contents of the policies and/or processes using the drop-down menu.

~~Disclosure~~ C~~-~~757 – Severe negative human rights incidents

~~236.~~238. A "confirmed ***incident***" refers to a legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or ***grievance mechanisms***.

Comprehensive Module Guidance ~~–~~ Business Conduct Metrics

~~Disclosure~~ C~~-~~8 61– Revenues from certain sectors and exclusion from EU reference benchmarks

~~237.~~239. **Fossil fuels**, as defined in Article 2~~,~~ ~~point~~ (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council, are non-renewable carbon-based energy sources such as solid fuels, natural gas~~,~~ and oil.

~~238.~~240. The **production of chemicals** refers to the activities listed under Division 20.2 of Annex I to Regulation (EC) No 1893/2006, i.e.~~,~~ the manufacturing of pesticides and other agrochemical products.

~~239.~~241. As defined by Article 12.1 and 12.2 of the Commission Delegated Regulation (EU) 2020/1818, the companies excluded from EU Paris-aligned Benchmarks are the following:

(a) companies that derive 1~~-~~% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;

(b) companies that derive 10~~-~~% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;

(c) companies that derive 50~~-~~% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; and

(d) companies that derive 50~~-~~% or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO_2 e/kWh.

~~Disclosure~~ C ~~-~~9 ~~72~~– Gender diversity ratio in governance body

~~240.~~242. The ***governance*** body refers to the highest decision-making authority in a company. Depending on the jurisdiction the company is in and its legal entity classification, the governance body can vary in format.

~~241.~~243. Based on the requirements in the SFDR, the gender diversity ratio of the ***governance*** body is calculated as an average ratio of female to male board members.

$$Gender\ diversity\ ratio = \frac{the\ number\ of\ female\ members}{the\ number\ of\ male\ members}$$

Example

~~242.~~244. The ***governance*** body of a certain SME is composed of six members, including three women. The gender diversity ratio is one – for every female member there is one male member.

Appendix A: Defined terms

This appendix is an integral part of this [draft] Standard.

Defined term	Definition
Accident prevention	Accident prevention refers to the policies and initiatives to prevent workplace accidents and ensure the safety and well-being of employees. This not only includes measures to reduce physical risks but also involves fostering a safe and inclusive work environment free from discrimination and harassment.
Actions	Actions refer to (i) actions and actions plans (including transition plans) that are undertaken to ensure that the undertaking delivers against targets set and through which the undertaking seeks to address material impacts, risks and opportunities; and (ii) decisions to support these with financial, human or technological resources.
Affected communities	People or group(s) living or working in the same geographical area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the undertaking's operations (local communities) to those living at a distance. Affected communities include actually and potentially affected indigenous peoples.
Biodiversity sensitive Area	Biodiversity sensitive areas include: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139.
Business Conduct	The following matters are collectively referred to as 'business conduct or business conduct matters': (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices, especially with regard to late payment to small and medium-sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities.
Child Labour	Work that deprives children of their childhood, potential, and dignity and harms their physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and/or interferes with their schooling (by preventing them from the opportunity to attend school).
Collective bargaining	All negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more trade unions or, in their absence, the representatives of the workers duly elected and authorised by them in accordance with national laws and regulations, on the other, for: i) determining working conditions and terms of employment; and/or ii) regulating relations between employers and workers; and/or regulating relations between employers or their organisations and a workers' organisation or workers' organisations.
Corruption	Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation

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Defined term	Definition
	payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.
Consumers	Individuals who acquire, consume or use goods and services for personal use, either for themselves or for others, and not for resale, commercial or trade, business, craft or profession purposes.
Classified information	EU classified information as defined in Council Decision of 23 September 2013 on the security rules for protecting EU classified information (2013/488/EU) or classified by one of the Member States and marked as per Appendix B of that Council decision. EU classified information means any information designated by a EU security classification, of which the unauthorised disclosure could cause varying degrees of prejudice to the interests of the European Union or of one or more of the Member States. Classified information may be classified according to four levels: top secret, secret, confidential, restricted (based on the definition from the Council Decision).
Circular economy principles	The European circular economy principles are usability; reusability; repairability; disassembly; remanufacturing or refurbishment; recycling; recirculation by the biological cycle; other potential optimisation of product and material use.
Climate change adaptation	The process of adjustment to actual and expected climate change and its impacts.
Climate-related physical risks	Risks resulting from climate change that can be event-driven (acute) or from longer-term shifts (chronic) in climate patterns. Acute physical risks arise from particular hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from longer-term changes in the climate, such as temperature changes, and their effects on rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
Direct GHG emissions (Scope 1)	Direct GHG emissions from sources that are owned or controlled by the undertaking.
Discrimination	Discrimination can occur directly or indirectly. Direct discrimination occurs when an individual is treated less favourably by comparison to how others, who are in a similar situation. Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics.
Employee	An individual who is in an employment relationship with the undertaking according to national law or practice.
End-users	Individuals who ultimately use or are intended to ultimately use a particular product or service.
Forced Labour	All work or service which is exacted from any person under the threat of penalty and for which the person has not offered himself or herself

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Defined term	Definition
	voluntarily according to the ILO Forced Labour Convention, 1930 (No.29). The term encompasses all situations in which persons are coerced by any means to perform work.
Grievance mechanism	Any routinized, state-based or non-state-based, judicial or non-judicial processes through which stakeholders can raise grievances and seek remedy. Examples of state-based judicial and non-judicial grievance mechanisms include courts, labour tribunals, national human rights institutions, National Contact Points under the OECD Guidelines for Multinational Enterprises, ombudsperson offices, consumer protection agencies, regulatory oversight bodies, and government-run complaints offices. Non-state-based grievance mechanisms include those administered by the undertaking, either alone or together with stakeholders, such as operational-level grievance mechanisms and collective bargaining, including the mechanisms established by collective bargaining. They also include mechanisms administered by industry associations, international organisations, civil society organisations, or multi-stakeholder groups. Operational-level grievance mechanisms are administered by the organisation either alone or in collaboration with other parties and are directly accessible by the organisation's stakeholders. They allow for grievances to be identified and addressed early and directly, thereby preventing both harm and grievances from escalating. They also provide important feedback on the effectiveness of the organisation's due diligence from those who are directly affected. According to UN Guiding Principle 31, effective grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning. In addition to these criteria, effective operational-level grievance mechanisms are also based on engagement and dialogue. It can be more difficult for the organisation to assess the effectiveness of grievance mechanisms that it participates in compared to those it has established itself.
Greenhouse Gases (GHG)	For the purposes of this Standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO_2); methane (CH_4); nitrous oxide (N_2O); Nitrogen trifluoride (NF_3); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF_6).
Governance	The governance is the system of rules, practices and processes by which a company is directed and controlled.
Gross greenhouse gas (GHG) emissions	Gross greenhouse gas (GHG) emissions are total GHG emissions released by the undertaking into the atmosphere, without considering any deductions for carbon removals or other adjustments.
Hazardous waste	Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste.
Human trafficking	The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

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Defined term	Definition
Incident	A legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms
Indirect GHG emissions (Scope 2)	Indirect emissions are a consequence of the operations of the undertaking but occur at sources owned or controlled by another company. Scope 2 GHG emissions are indirect emissions from the generation of purchased or acquired electricity, steam and heat, or cooling consumed by the undertaking.
Impact	Impact refers to the effect an organization has or could have on the economy, environment, and people, including effects on their human rights, as a result of the organization's activities or business relationships. The impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, direct or indirect, and reversible or irreversible. These impacts indicate the organization's contribution, negative or positive, to sustainable development. The impacts on the economy, environment, and people are interrelated. The organization's impacts on the environment refer to the impacts on living organisms and non-living elements, including air, land, water, and ecosystems. An organization can have an impact on the environment through, for example, its use of energy, land, water, and other natural resources. The organization's impacts on people refer to the impacts on individuals and groups, such as communities, vulnerable groups, or society. This includes the impacts the organization has on people's human rights. An organization can have an impact on people through, for example, its employment practices (e.g., the wages it pays to employees), its supply chain (e.g., the working conditions of workers of suppliers), and its products and services (e.g., their safety or accessibility).
Land-use (change)	The human use of a specific area for a certain purpose (such as residential; agriculture; recreation; industrial, etc.). Influenced by land cover (grass, asphalt, trees, bare ground, water, etc). Land-use change refers to a change in the use or management of land by humans, which may lead to a change in land cover.
Location-based Scope 2 emissions	Emissions from electricity, heat, steam and cooling purchased or acquired and consumed by the reporting company, calculated using the location-based 'allocating' method, which allocates generator emissions to end-users. They reflect the average emissions intensity of grids on which the energy consumption occurs and uses mostly grid-average emission factor data. Typical sources of Scope 2 emissions relate to any equipment that consumes electricity (electrical engines, lights, buildings, etc.), heat (heating in industrial processes, buildings, etc.), steam (industrial processes) and cooling (industrial processes, buildings, etc.).
Nature-oriented area	A "nature-oriented area" is an area dedicated primarily to nature preservation or restoration. They can be located on-site and include elements like roof, façade, water drainages designed, to promote biodiversity. Nature-oriented areas can also be located outside the organisation site provided that the area is owned or (co-)managed by the

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Defined term	Definition
	organisation and is primarily dedicated to promoting biodiversity. (Adapted from EMAS regulation)
Near (Biodiversity Sensitive Area)	Near, in the context of B5 – Biodiversity, shall refer to an area that is (partially) overlapping or adjacent to a biodiversity sensitive area.
Own workforce/own workers	Employees who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78).
Pay	The ordinary basic or minimum wage or salary and any other remuneration, whether in cash or in kind which the worker receives directly or indirectly ('complementary or variable components'), in respect of his/her employment from his/her employer. 'Pay level' means gross annual pay and the corresponding gross hourly pay. 'Median pay level' means the pay of the employee that would have half of the employees earn more and half less than they do.
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a sustainability issue. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is implemented through actions or action plans. For example, undertakings with less resources may have few (or no) policies formalised in written documents, but this does not necessarily mean they do not have policies. If the undertaking has not yet formalised a policy but has implemented actions or defined targets through which the undertaking seeks to address sustainability topics and subtopics, it shall disclose them.
Radioactive waste	Any radioactive material in gaseous, liquid, or solid form, for which no further use is foreseen, as per Article 3(7) of Council Directive 2011/70/Euratom[17].
Recordable work-related accident / Recordable work-related injury or ill health	A work-related accident is an event that leads to physical or mental harm therefore to injury or ill health. It happens whilst engaged in an occupational activity or during the time spent at work. Recordable means diagnosed by a physician or other licensed health care professionals. Work-related injury or ill health can result in any of the following: death, days away from work, restricted work or transfer to another job, medical

[17] Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.[18]Article 2(1) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).[19] This disclosure requirement is consistent with the requirements included in Commission Implementing Regulation (EU) 2022/2453 - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.

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Defined term	Definition
	treatment beyond first aid or loss of consciousness. Injuries that do not require medical treatment beyond first aid are generally not recordable.
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.
Renewable Energy	Energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas[18].
Sealed area	A sealed area means any area where the original soil has been covered (such as roads) making it impermeable. This non-permeability can create environmental impacts.
Sensitive information	Sensitive information as defined in Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund. Sensitive information means information and data, including classified information, that is to be protected from unauthorised access or disclosure because of obligations laid down in Union or national law or in order to safeguard the privacy or security of a natural or legal person.
Site	The location of one or more physical installations. If there is more than one physical installation from the same or different owners or operators and certain infrastructure and facilities are shared, the entire area where the physical installation are located may constitute a site.
Targets	Measurable, outcome-oriented and time-bound goals that the SME aims to achieve in relation to material sustainability topics and subtopics. They may be set voluntarily by the SME or derive from legal requirements on the undertaking.
Time horizons	When preparing its sustainability report, the undertaking shall adopt the following time horizons: (a) for the short-term time horizon, one year; (b) for the medium-term time horizon, from two to five years; and (c) for the long-term time horizon, more than five years.
Training	Initiatives put in place by the undertaking aimed at the maintenance and/or improvement of skills and knowledge of its own workers. It can include different methodologies, such as on-site training, and online

[18]Article 2(1) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).[19] This disclosure requirement is consistent with the requirements included in Commission Implementing Regulation (EU) 2022/2453 - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.

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Defined term	Definition
	training.
Value Chain	The full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. A value chain encompasses the activities, resources and relationships the undertaking uses and relies on to create its products or services from conception to delivery, consumption and end-of- life. Relevant activities, resources and relationships include: a) those in the undertaking's own operations, such as human resources; b) those along its supply, marketing and distribution channels, such as materials and service sourcing and product and service sale and delivery; and c) the financing, geographical, geopolitical and regulatory environments in which the undertaking operates. Value chain includes actors upstream and downstream from the undertaking. Actors upstream from the undertaking (e.g. suppliers) provide products or services that are used in the development of the undertaking's products or services. Entities downstream from the undertaking (e.g. distributors, customers) receive products or services from the undertaking.
Wage	Gross wage, excluding variable components such as overtime and incentive pay, and excluding allowances unless they are guaranteed.
Water consumption	The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period.
Water withdrawal	The sum of all water drawn into the boundaries of the undertaking from all sources for any use over the course of the reporting period.
Worker in the value chain	An individual performing work in the value chain of the undertaking, regardless of the existence or nature of any contractual relationship with the undertaking. In the ESRS, the scope of workers in the value chain include all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking. This includes impacts that are connected to the undertaking's own operations, and value chain, including through its products or services, as well as through its business relationships. This includes all workers who are not in the scope of 'Own Workforce' ('Own Workforce' includes people who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in employment activities (NACE Code N78).

Appendix B: List of possible sustainability issues

The appendix below is an integral part of this [draft] Standard and provides a list of possible sustainability issues.

Sustainability issue covered in [draft] topical ESRS		
Topic	**Sustainability issue: Sub-topic**	**Sustainability issue: sub-sub topic**
Climate change	– Climate change adaptation – Climate change mitigation – Energy	
Pollution	– Pollution of air – Pollution of water – Pollution of soil – Pollution of living organisms and food resources – Substances of concern – Substances of very high concern – Microplastics	
Water and marine resources	– Water – Marine resources	– Water consumption – Water withdrawals – Water discharges – Water discharges in the oceans – Extraction and use of marine resources
Biodiversity and ecosystems	– Direct impact drivers of biodiversity loss	– Climate Change – Land-use change, fresh water-use change and sea-use change – Direct exploitation – Invasive alien species – Pollution – Others
	– Impacts on the state of species	– Examples: – Species population size – Species global extinction risk
	– Impacts on the extent and condition of ecosystems	– Examples: – Land degradation – Desertification – Soil sealing
	– Impacts and dependencies on ecosystem services	
Circular economy	– Resources inflows, including resource use – Resource outflows related to products and services – Waste	
Own workforce	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue

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Sustainability issue covered in [draft] topical ESRS		
Topic	**Sustainability issue: Sub-topic**	**Sustainability issue: sub-sub topic**
		– Freedom of association, the existence of works councils and the information, consultation and participation rights of workers – Collective bargaining, including rate of workers covered by collective agreements – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – Employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Privacy
Workers in the value chain	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue – Freedom of association, including the existence of work councils – Collective bargaining – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – The employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Water and sanitation – Privacy
Affected communities	– Communities' economic, social and cultural rights	– Adequate housing – Adequate food – Water and sanitation – Land-related impacts

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Sustainability issue covered in [draft] topical ESRS		
Topic	**Sustainability issue: Sub-topic**	**Sustainability issue: sub-sub topic**
		– Freedom of association, the existence of works councils and the information, consultation and participation rights of workers – Collective bargaining, including rate of workers covered by collective agreements – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – Employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Privacy
Workers in the value chain	– Working conditions	– Secure employment – Working time – Adequate wages – Social dialogue – Freedom of association, including the existence of work councils – Collective bargaining – Work-life balance – Health and safety
	– Equal treatment and opportunities for all	– Gender equality and equal pay for work of equal value – Training and skills development – The employment and inclusion of persons with disabilities – Measures against violence and harassment in the workplace – Diversity
	– Other work-related rights	– Child labour – Forced labour – Adequate housing – Water and sanitation – Privacy
Affected communities	– Communities' economic, social and cultural rights	– Adequate housing – Adequate food – Water and sanitation – Land-related impacts

Appendix C: Additional explanatory information for financial market participants that are users of the information produced using this [draft] Standard

245. This appendix is relevant for users of the sustainability report. The table below illustrates the Sustainable Finance Datapoints that are present in different modules of this Standard that satisfy the requests of multiple user types (banks, investors, large undertakings).

246. The column 'DR number and Title' identifies the disclosures present in the different modules (i.e. Basic Module, and Comprehensive Module) that are Sustainable Finance datapoints. The column SFDR Table 1 and/or EBA Pillar 3 and/or Benchmark Regulation illustrates how these disclosures relate to these regulations that are relevant for users of the sustainability report (banks, other investors).

<table>
<tr><th>Topic: Environment / Social / Governance</th><th>DR number and Title</th><th>SFDR Table 1
and/or
EBA Pillar 3
and/or
Benchmark Regulation</th></tr>
<tr><td colspan="3">Basic Module</td></tr>
<tr><td>Cross Cutting</td><td>B1 – Basis for preparation
The undertaking shall disclose:
vii. geolocation of sites owned, leased or managed.</td><td>EBA Pillar 3[19]</td></tr>
<tr><td>Environment</td><td>B3 – Energy and greenhouse gas emissions
The undertaking shall disclose its total energy consumption in MWh, with a breakdown as per the table below, if it can obtain the necessary information to provide such a breakdown:
<table>
<tr><th></th><th>Renewable</th><th>Non-renewable</th><th>Total</th></tr>
<tr><td>Electricity (as reflected in utility billings)</td><td></td><td></td><td></td></tr>
<tr><td>Fuels</td><td></td><td></td><td></td></tr>
<tr><td>Total</td><td colspan="3"></td></tr>
</table></td><td>SFDR[20]</td></tr>
</table>

[19] This disclosure requirement is consistent with the requirements included in Commission Implementing Regulation (EU) 2022/2453 - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.

[20] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #5 in Table 1 of Annex I ("Share of non-renewable energy consumption and production").

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Environment	**B3 – Energy and greenhouse gas emissions** The undertaking shall disclose its estimated ***gross greenhouse gas (GHG) emissions*** in tons of CO_2 equivalent (tCO_2eq) considering the content of the GHG Protocol Corporate Standard, including: (a) the Scope 1 GHG emissions in tCO_2eq (from owned or controlled sources); and (b) the location-based Scope 2 emissions in tCO_2eq (i.e. emissions from the generation of purchased energy, such as electricity, heat, steam or cooling).	**SFDR**[21] **Benchmark**[22]
Environment	**B3 – Energy and greenhouse gas emissions** The undertaking shall disclose its GHG intensity calculated by dividing 'total GHG emissions' disclosed under paragraph 30 by 'turnover (in Euros)' disclosed under paragraph 24(d)(iv).	**SFDR**[23] **Benchmark**[24]
Environment	**B4 – Pollution of air, water and soil** If the undertaking is already required by law or other national regulations to report to competent authorities its emissions of pollutants, or if it voluntarily reports on them according to an Environmental Management System, it shall disclose the pollutants it emits to air, water and soil in its own operations, with the respective amount for each pollutant. If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.	**SFDR**[25]
Environment	**B5 – Biodiversity** The undertaking shall disclose the number and area (in hectares) of sites that it owns, that it has leased or that it manages, that are located in or near biodiversity sensitive areas.	**SFDR**[26]

[21] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint")

[22] Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[23] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #3 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("GHG intensity of investee companies").

[24] This information is aligned with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 8 (1).

[25] Regulation (EU) 2019/2088 (SFDR) because it is derived from *(a)* an additional indicator related to principal adverse impacts as set out by indicator #2 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Emissions of air pollutants"); *(b)* indicator #8 in Table I of Annex I ("Emissions to water); *(c)* indicator #1 in Table II of Annex I ("Emissions of inorganic pollutants"); and *(d)* indicator #3 in Table II of Annex I ("Emissions of ozone-depleting substances").

[26] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #7 in Table 1 of Annex I ("Activities negatively affecting biodiversity-sensitive areas")

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Environment	**B7 – Resource use, circular economy and waste management** The undertaking shall disclose: (b) the total annual generation of waste broken down by type (non-hazardous and hazardous);	**SFDR**[27]
Social	**B9 – Workforce – Health and safety** The undertaking shall disclose the following information regarding its ***employees***: (a) the number and rate of ***recordable work-related*** accidents; and (b) the number of fatalities as a result of work-related injuries and work-related ill health.	**SFDR**[28] **Benchmark**[29]
Social	**B10 – Workforce – Remuneration, collective bargaining and training** The undertaking shall disclose: (a) the percentage gap in ***pay*** between its female and male ***employees***. The undertaking may omit this disclosure when its headcount is below 150 employees noting that this threshold will be reduced to 100 employees from 7 June 2031;	**SFDR**[30]
Governance	**B11 – Convictions and fines for corruption and bribery** In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.	**Benchmark**[31]
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[27] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #9 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Hazardous waste and radioactive waste ratio").

[28] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088, as reflecting an additional indicator related to principal adverse impacts as set out by indicator #2 in Table 3 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments ("Rate of accidents")

[29] Benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Weighted average ratio of accidents, injuries, fatalities" in section 1 and 2 of Annex 2.

[30] Regulation (EU) 2019/2088 (SFDR), mandatory indicator #12 in Table 1 of Annex I ("Unadjusted gender pay gap") and (EU) 2020/1816 Benchmark Regulation (EU), indicator "Weighted average gender pay gap" in section 1 and 2 of Annex II.

[31] Benchmark Regulation (EU) 2020/1816, indicator "Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws" in section 1 and 2 of Annex II.

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Environment	**Consideration when reporting on GHG emissions under B3 (Basic Module)** When reporting its Scope 1 and Scope 2 emissions, if the undertaking discloses entity-specific information on its Scope 3 emissions, it shall present it together with the information required under B3 – Energy and greenhouse gas emissions.	**SFDR**[32] **Benchmark**[33]
Environment	**C3 – GHG emissions reduction target** If the undertaking has established GHG emission reduction ***targets***, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 50 to 53 above and depending on the nature of its activities, the undertaking shall also provide targets for significant Scope 3 emissions. In particular, it shall provide: (a) the target year and target year value; (b) the base year and base year value; (c) the units used for ***targets***; (d) the share of Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns; and (e) a list of main actions it seeks to implement to achieve its ***targets***. If the undertaking that operates in high climate impact sectors[34] has adopted a transition plan for climate change mitigation, it may provide information about it, including an explanation of how it is contributing to reduce GHG emissions. In case the undertaking operates in high-climate impact sectors and does not have a transition plan for climate change mitigation in place, it shall indicate whether and, if so, when it will adopt such a transition plan.	**SFDR**[35] **Benchmark**[36] **EBA Pillar 3**[37] **Benchmark**[38]

[32] Regulation (EU) 2019/2088 (SFDR), mandatory indicators #1 and #2 in Table 1 of Annex I ("GHG emissions"; Carbon footprint")

[33] Regulation (EU) 2020/1816 Benchmark Regulation, Articles 5 (1), 6 and 8 (1).

[34] High climate impact sectors are those listed in NACE Sections A to H and Section L as defined in Annex I to Regulation (EC) No 1893/2006.

[35] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 (SFDR) because it is derived from an additional indicator related to principal adverse impacts as set out by indicator #4 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Investments in companies without carbon emission reduction initiatives")

[36]This information is aligned with the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 6.

[37] This information is aligned with Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics

[38] This information is aligned with the Regulation (EU) 2021/1119 of the European Parliament and of the Council (EU Climate Law), Article 2 (1); and with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 2.

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Environment	**C4 – Climate risks** If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall: (a) briefly describe such climate-related hazards and climate-related transition events; (b) disclose how it has assessed the exposure and sensitivity of its assets, activities and ***value chain*** to these hazards and transition events; (c) disclose the ***time horizons*** of any climate-related hazards and transition events identified; and (d) disclose whether it has undertaken ***climate change adaptation*** actions for any climate-related hazards and transition events. The undertaking may disclose the potential adverse effects of climate risks that may affect its financial performance or business operations in the short-, medium- or long-term, indicating whether it assesses the risks to be high, medium, low.	**Benchmark**[39] **EBA Pillar 3**[40]
Social	**C6 – Additional own workforce metric - Human rights policies and processes** The undertaking shall disclose an answer to the following questions. (a) Does the undertaking have a code of conduct or human rights ***policy*** for its ***own workforce***? (YES/NO) (b) If yes, does this cover: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/NO); iv. discrimination (YES/NO);	**Benchmark**[41] **SFDR**[42]

[39] Benchmark Regulation (EU) 2020/1816 Annex II: Environmental factors to be considered by underlying assets of the benchmark.

[40] EBA Pillar 3: ITS - Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk and EBA Pillar 3: ITS - Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral.

[41] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Exposure of the benchmark portfolio to companies without due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8" in section 1 and 2 of Annex II.

[42] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #11 in Table I of Annex I ("Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises") and by indicator #5 in Table III of Annex I ("Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters") and by indicator #9 in Table III of Annex I ("Share of investments in entities without a human rights policy") of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments.

	v. accident prevention (YES/NO); or vi. other? (YES/NO – if yes, specify). (c) Does the undertaking have a complaints-handling mechanism for its own workforce? (YES/ NO)	
Social	**C7 – Severe human rights incidents** The undertaking shall disclose an answer to the following questions: (a) Does the undertaking have confirmed incidents in its ***own workforce*** related to: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/ NO); iv. discrimination (YES/ NO); or v. other? (YES/NO – if yes, specify). (b) If yes, the undertaking may describe the ***actions*** being taken to address the ***incidents*** described above. (c) Is the undertaking aware of any confirmed ***incidents*** involving ***workers in the value chain***, ***affected communities***, ***consumers*** and ***end-users***? If yes, specify.	**SFDR**[43] **Benchmark**[44]
Governance	**C8 – Revenues from certain sectors and exclusion from EU reference benchmarks** If the undertaking is active in one or more of the following sectors, it shall disclose its related revenues in the sector(s): (a) controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons);	**SFDR**[45] **Benchmark**[46]

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[43] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory and additional indicator related to principal adverse impacts as set out by indicator #10 in Table I of Annex I and by indicator #14 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ("Violations of UNGC principles and OECD Guidelines for Multinational Enterprises" and "Number of identified cases of severe human rights issues and incidents")

[44] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator "Number of benchmark constituents subject to social violations (absolute number and relative divided by all benchmark constituents), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law" in section 1 and 2 of Annex II.

[45] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #14 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)").

[46] Benchmark Regulation (EU) 2020/1818 Article 12(1): "Administrators of EU-Paris aligned Benchmarks shall exclude all of the following companies from those benchmarks: companies involved in any activities related to controversial weapons; " and Benchmark Regulation (EU) 2020/1816 Annex II: Weighted average percentage of benchmark constituents in the controversial weapons sector."

	(b) the cultivation and production of tobacco;	**EBA Pillar 3**[47] **Benchmark**[48]
	(c) fossil fuel (coal, oil and gas) sector (i.e. the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council17), including a disaggregation of revenues derived from coal, from oil and from gas); or	**SFDR**[49] **EBA Pillar 3**[50] **Benchmark**[51]
	(d) chemicals production, if the undertaking is a manufacturer of pesticides and other agrochemical products.	**SFDR**[52] **EBA Pillar 3**[53]
	The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement.	**EBA Pillar 3**[54] **Benchmark**[55]
Governance	**C9 – Gender diversity ratio in governance body** If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	**SFDR**[56]

[47] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in the manufacturing of tobacco products excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[48] This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1818 as set out by paragraph b) of article 12.1. and Benchmark Regulation (EU) 2020/1816 Annex II: "Weighted average percentage of benchmark constituents in the tobacco sector."

[49] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #4 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Exposure to companies active in the fossil fuel sector")

[50] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in Mining and quarrying excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[51] Benchmark Regulation (EU) 2020/1818 Article 12(1).

[52] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #9 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ("Investments in companies producing chemicals").

[53] EBA Pillar 3: Template 1: Banking book - Climate change transition risk: Companies in Mining and quarrying excluded from EU-Paris aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

[54] This disclosure requirement is consistent with the requirements in Commission Implementing Regulation (EU) 2022/2453 - template 1 climate change transition risk.

[55] This disclosure requirement is aligned with Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Article 12.1.

[56] This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #13 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to disclosures rules on sustainable investments ("Board gender diversity")

		Benchmark[57]

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[57] This information supports the information needs of benchmark administrators to disclose ESG factors subject to Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as set out by indicator "Weighted average ratio of female to male board members" in section 1 and 2 of Annex II.

Annex 10: Timing and location of the sustainability report in European countries[20]

Type of enterprise		EU Accounting Directive	IFRS	Austria	Belgium	Germany	Ireland	Italy	Spain	Sweden
Non-listed	Micro	Minimum requirement on Financial Statements: - Balance sheet - Profit & loss account (Subject to Member States transposition law)	IFRS Foundation (2013). A Guide for Micro-sized Entities Applying the IFRS for SMEs (2009). To note: "IFRS for SME" does not refer to the EU size but is applicable to non-public accountable entities, so basically:		Social balance sheet (minimum requirements)			Same as per EU Accounting Directive. Balance sheet and profit and loss account are simplified with aggregation of accounting items. Exemption to prepare the management report and to provide social or environmental disclosure. Exemption to prepare notes to the FS, providing	Management report (no non-financial information)	Management report (no non-financial information)

[20] Sources: European Federation of Accountants and Auditors for SMEs (2018); Accountancy Europe, CSR Europa & GRI (2017); Zager & Decman (2016), Guidelines and Recommendations for Improving the Micro Entities Model of Financial Reporting

Type of enterprise		EU Accounting Directive	IFRS	Austria	Belgium	Germany	Ireland	Italy	Spain	Sweden
			unlisted-entities					some very limited disclosure.		
	Small	Financial Statements: - Balance Sheet - Profit and loss account - Management report: environmental & social aspects (subject to national transposition and option to waive obligation at national level)	IFRS SMEs	Management report (no non-financial performance information required)	Social balance sheet		Reduced Management report (no non-financial information)	Same as per EU Accounting Directive. Balance sheet and profit and loss account are simplified with aggregation of accounting items. Exemption to prepare the management report and to provide social or environmental disclosure. Moreover, exemption to	Management report (no non-financial information)	Management report (no non-financial information)

Type of enterprise		EU Accounting Directive	IFRS	Austria	Belgium	Germany	Ireland	Italy	Spain	Sweden
								prepare the cash flow statement.		
	Medium	Financial Statements: -Balance Sheet -Profit and loss account -Management report: environmental and social aspects (option to waive on national level)	IFRS SMEs	Management report (no non-financial performance information required)	Management report and; Social balance sheet	Management report	Full Management report (no non-financial information)	Same as per EU Accounting Directive. Obligation to prepare a management report, including some disclosure on environmental and employee matters.	Management report (no non-financial information)	Management report (no non-financial information)

Annex 11: Public consultation – Key findings – online survey responses

About this summary

1. EFRAG has conducted an online questionnaire-based survey to gather views from stakeholders that have participated in the public consultation of the Exposure Draft for a voluntary sustainability reporting standard for non-listed SMEs (including micro undertakings). The results of the public consultation survey that included 311 participants as preparers, users and other (consultants, accountants, etc.) are summarised in the online survey Detailed Report VSME ED public consultation.

2. In addition, EFRAG Secretariat received 26 Comment Letters (directly uploaded through the online survey), that were analysed in the online survey Detailed Report VSME public consultation. Some organisations have sent both comment letters and answered to the online questionnaire. In this case, to avoid double counting, following a consistency check between the two submissions, the online questionnaire responses have been accounted (more comparable).

3. The key messages emerged in the Detailed Report are summarised in this Executive Summary of online survey, along the following categories of stakeholders: preparers (SMEs and SMEs associations), “users” (including banks and large corporates heads of supply chains); and “others” (including standard setters, NGOs, unions/worker representatives, academics, consultants/accountants/assurance providers, associations etc.). Being VSME ED a voluntary standard that builds on “market acceptance’ specific questions were dedicated to the categories "preparers "and “users ".

4. The public consultation questionnaire was designed to receive feedback from constituents on key aspects of the EDs, including (i) the proposed architecture; (ii) the relevance of the proposed disclosures; (iii) the simplifications achieved; and (iv) the market acceptance. The questionnaire aimed to capture users' and preparers' perspectives while offering the opportunity to all other interested constituents to also provide feedback.

5. The online questionnaires consisted of three parts: Part 1 (the most critical questions that EFRAG encourages to answer in full), Part 2 (additional and more detailed technical questions that EFRAG encouraged to answer as much as possible) and Part 3 on Value Chain Cap.

6. The link to the detailed feedback from the online survey (VME ED Public Consultation) can be found here.

7. This summary uses the following terms to describe the extent to which particular feedback was shared by respondents (both when referring to total respondents or a subset of respondents).

All: 100% of respondents
Most: 80% to 99% of respondents
A majority: 50% to 79% of respondents
Some: 20% to 49% of respondents
A few: 1% to 19% of respondents
None: 0% of respondents

Part 1

8. Most of the respondents agree with the **standard setting objectives (Q1)**. There was a general call for adding digital tools, simplifying structure/language and adding guidance. Preparers suggested the importance of EU Commission action to ensure that business counterparts commit to abandon their questionnaires. The need to underscore legitimacy and legal status of the VSME was also raised by the users. Users indicated that while VSME is able

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to satisfy a large proportion of questionnaires, some additional requests would remain either based on individual counterparts or transactions (by banks) or granular requests by sectors (for large undertakings).

9. On the architecture (Q2) a majority of respondents agreed on the three modules and their combination. There are general suggestions to: i) add online tools and guidance; ii) the materiality analysis is highly complex/not feasible for SME and iii) simplify the structure or adapt the disclosures for size, sector and potentially location. Some preparers suggest that BP module should be prioritised compared to Narrative PAT Module. Others suggest creating a "Basic Plus" Module with metrics from BP / PAT Modules. Users (banks/investors) support the flexibility but note that it may be a source of confusion, as such they indicate preference for Basic Module + Business Partner Module. Large undertakings users are hesitant on reliability of qualitative disclosures.

10. On the **Basic Module (Q3)**, a majority of respondents indicated support as a proportionate entry level. User respondents were the most supportive, followed by preparers, the "other" respondents were the least supportive. Suggestions included: i) further language simplification; ii) additional guidance, examples, and online templates; iii) clarification on the usage of "if applicable".

11. For **Narrative PAT Module (Q4)**, a majority of respondents supported the approach to reserve it to undertakings that have policies, actions and targets in place. Frequently mentioned concerns and suggestions from respondents were: i) need to simplify approach to materiality, guidance and tools; ii) materiality analysis is a challenge for all. Many users found the narrative nature of the module problematic, as it made it difficult to obtain the necessary information and make comparisons across respondents or over time. A more quantitative approach is preferrable (e.g. moving to a checklist of YES/NO questions). Preparers, in particular SMEs associations, consider materiality and PAT over demanding and suggest deleting or postponing it.

12. For the **Business Partners (BP) Module (Q5),** a majority of respondents agreed with the approach to be a replacement and standardisation of information requests by business partners. The following suggestions emerged across respondents type: i) delete materiality analysis from BP module, replace with "if applicable"; ii) additional guidance and tools are needed (e.g., on climate risks, transition plans, violations of OECD Guidelines); iii) too many references to extensive documents written for multinational companies (e.g., OECD guidelines), especially with English as a foreign language, iv) some metrics of BP module should be part of the Basic module. On the users side it is highlighted that BP may not cover entirely the requests by business partners, due to specific sector requests. Users also suggested to emphasise the flexibility in par.11 and 19 i.e. adopting Basic module by topping up some datapoints from PAT and BP modules. In addition, user banks associations point out that some disclosures (BP 10 and BP 11) are not required by SFDR or BMR and thus suggest removing them from the BP Module.

13. A majority of respondents identified a percentage of replacement of ESG questionnaires or ESG requests (Q6) with VSME three modules higher than 50% and for some above 80%. The user group "Large undertaking as SME's business partner" and majority of the group banks/investors indicated at 50% or above, and others such as "Rating Agency (as proxy for user)" identified a degree of coverage higher than 80% if the Basic and BP Module modules are filled out in detail. Many financial institutions acknowledge that VSME will not include all data needed to manage their sustainability risks as this is highly individual. They also suggested inclusion of further datapoints for VSME to be able to better meet their needs, as further explained later in the report. An important message was that the success of the VSME depends on a central European software interface into which the reporting companies can enter their data and from which it can be read by business counterparts.

14. On the **approach to sectors (Q7)** in VSME, Option 3 was the most selected compared to the other options. Option 3 suggests that undertakings should apply on a voluntary basis sector specific guidelines and disclosures designed for non-listed SMEs, to be issued by EFRAG as a non-authoritative annex to the future sector-ESRS. The main argument that emerged was that non-listed SMEs need to be differentiated from listed SMEs as they have different characteristics. To note that the same question was asked in the context of ESRS LSME (listed SMEs) ED public consultation whose feedback is analysed separately.

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Part 2

15. *O*n the **Principles for preparation,** *(Q8)* most respondents agreed with the proposed approach. While respondents across categories agreed with the proposal to report on a **consolidated basis** *(Q10*), SME associations demanded for more flexibility for preparers to choose whether to include subsidiaries. Some users suggested that subsidiaries sometimes are irrelevant (such as when they are not consolidated for financial purposes) and insisted on transparency regarding which entities are included in the reporting. Regarding the other principles for preparation suggestions include: i) include positive impact aspects (as currently the focus is on negative impact); ii) more guidance (i.e. on the term 'comparable'); iii) flexibility on frequency of reporting (preparers indicated yearly too cumbersome), iv) add guidance on omittance of sensitive information (definitions of sensitive).

16. *On the envisaged combination of modules (Q9 market acceptance), only few respondents supported the combination Basic Module + Narrative-PAT Module. Some indicated preference for Basic Module only, some for Basic + Business Partner and some for the 3 modules. Respondents who preferred the 3 modules argued that this combination is for better transparency and accountability. Many respondents also argued that Basic Module is not sufficient as users of the sustainability reports require more information than what contained in the Basic Module. Preparers had a relatively higher preference for either 'all 3 modules' or 'Basic Module only'. "Basic Module" + "Narrative" was the least chosen option by preparers. On the users' side banks/investors indicated preference for "Basic Module + Business Partners", while large undertakings and rating agencies preferred the option "all 3 modules".*

17. *On subsidiary exemption (Q11), most respondents' users and preparers agreed; in the category "others" a majority agreed. Respondents in this category, in particular the associations of users and preparers, emphasised that since VSME is voluntary, (not in CSRD), specifying a subsidiary exemption is unnecessary. Overall, they recommend leaving the choice to the SMEs.*

18. On the additional component (including sectors/ Q12), most users agreed; in the categories preparers and "others" a majority agrees. Suggestion to define what is 'common to the undertaking's sector'. Some users and preparers also indicated additional preparatory costs on reporting entities in deciding on additional disclosures.

19. On the Basic Module (Q13-Q19) there was overall support. On the preparers' side B1, B8 and B9 were considered feasible by most respondents, while B2, B4, B5, B6, B7 and B12 were considered feasible by a majority. B11 had more respondents who considered it difficult to prepare. On B3 there are split views, with half considering it feasible and half not. On the users side all disclosures from B1 to B10, as well as B12, were considered essential by most of the respondents. On the other hand, B3 was considered the most essential for users. On B3 preparers were split, due to difficulty linked to data availability and/or collection, and the fact that this disclosure requires the need for external support and guidance.

20. In general, on all disclosures, a majority of respondents requested additional guidance, with respect to calculations and terminology. There were specific suggestions per each disclosure.

21. On the **question to users whether additional datapoints (Q14) are needed in Basic Module**, split views emerged with about half of respondents indicating that no datapoints are missing and the other half indicating that there are datapoints missing that are considered important (please see below in this report). On the questions whether respondents see **any potential in disclosures B3-B7 for better alignment with existing reporting schemes (i.e. EMAS) (Q15),** split views emerged with a tiny majority (51%) of respondents agreeing. They noted that SMEs already using EMAS should benefit from streamlined alignment with VSME ED. Harmonization with recognized standards like GRI, IFRS, and CDP is seen as beneficial. Some respondents highlighted that EMAS may be too complex and costly for SMEs. for alignment with ESRS or ISO 14001.

22. On the question (Q16) on B9 if the practice in the respondent's **country includes commuting incidents in B9 as work-related fatalities**, most respondents agreed. They noted that the legislation already defines these terms, though definitions may vary between countries. On the question (Q17) related to **B10 a)** that asks to report the relevant **ratio of the entry level wage to the minimum wage** "when a significant proportion of employees are compensated based on wages subject to minimum wage rules," and whether this provides relevant and comparable

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information, a majority of respondents agreed, with some respondents disagreeing especially SMEs business associations (in category "other respondents"). There are split views among users regarding comparability of this ratio.

23. On the question on **B11** (Q18) and whether respondents agreed with the **voluntary approach** to the disclosure in B11, the majority of respondents agreed. However, in the category "other", business associations on both preparers and users side expressed disagreement, not as much with voluntary approach, but with the inclusion of B11 in Basic Module. They asked to move it outside the Basic Module, arguing that despite its voluntary nature, it imposes unrealistic expectations on SMEs.

24. On the last question, on **the guidance in VSME for the Basic Module** (Q19), a majority of respondents show support to the specific guidance provided that is regarded very useful for SMEs. However, several respondents noted areas needing further clarification, particularly on specific disclosures (e.g., B4, B5, B10) and calculation methods (e.g., GHG emissions, biodiversity impacts). More practical examples and user-friendly tools are recommended to enhance usability and comprehensive online tool to calculate metrics. Preparers also asked for educational support.

25. On the principles of materiality (Q20) to be applied to the Narrative PAT and Business Partner module (impact materiality, financial materiality and stakeholders' engagement) and whether they are considered proportionate, a majority of respondents agreed. However, the comments indicated substantial concerns about materiality. The most recurring were: i) the complexity of the materiality process and selection/engagement with stakeholders; ii) the need to provide guidance, examples, templates, tools to help SMEs; iii) since the material process poses a significant preparatory cost on SMEs, the suggestion to use sector-guidance instead or closed ended questions; iv) add positive impacts as optional, not only financial opportunities v) for preparers the financial risk is difficult.

26. On the question (Q21) related to disclose **sustainability matters listed in Annex B** of the VSME ED (which is the same as AR 16 of ESRS 1 general requirements) that are material to the undertaking and whether respondents agree with this approach, there was a mismatch between the answers provided to the closed question (agree/disagree) and the qualitative comments. In the statistics most preparers and a majority of users and "others" agreed. However, the qualitative comments indicated disagreement on the substance. The most recurring comments were the following: i) materiality analysis and sustainability matters are considered too complex; ii) need to provide guidance, examples, charts, templates, tools to help SMEs., iii) the fact that the materiality analysis is useful but heavy for SMEs, time consuming and very costly; iv) suggestion to use sector-guidance pre-defined materiality instead. Preparers indicated challenges on implementation, uncertainty and cost. SMEs business association indicated preference to prioritise Basic Module and BP Module before the Narrative PAT Module. Users indicated that PAT module is not considered attractive by SMEs and not necessary. Standard setters commented that conducting a formal materiality analysis should not be obligatory in line with the proportionality principle, as SMEs may refer to indicative tables of material topics by sector. Some NGO respondents suggested that instead of focusing on the materiality approach, the VSME standard could focus on enhanced sectoral guidance for non-listed SMEs.

27. On the question (Q22) about the **notion of "report only if applicable**" in Basic Module and in parts of the BP Module most of the respondents agreed. In the category "other" a majority agreed. The most recurring comments were: i) support the "if applicable" approach that is useful to replace materiality. ii) materiality is very demanding for SMEs; iii) there is a need to clarify the difference between the following: "material", "if applicable", "if relevant".

28. On the questions on the **approach to "financial opportunities "**as optional (Q23) most of the respondents agreed. In the category "other" a majority agreed. The most recurring comments were: i) including financial opportunities may help the undertaking to manage risk, build awareness and identify new financial options; ii) to avoid a disproportionate preparatory cost on SMEs, such reporting should remain optional.

29. On the question (Q24) regarding the **principles for the preparation** for the Narrative-PAT and Business Partners Module most respondents agreed both with time horizons and with linkages to financial report. Recurring comments on time horizons were: i) it guides the undertaking; ii) administrative preparatory cost was mentioned as SMEs find a 5-year, time horizon difficult; iii)

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more flexibility is needed. On alignment with financial statements, comments were: ii) support as it avoids duplicating information; ii) it is challenging and complicated. Guidance is needed.

30. On the question (Q25) related to Narrative-PAT Module and which disclosures are considered feasible/ not feasible by preparers or essential/not necessary by users, there was a mismatch between the answers provided to the closed question (agree/disagree) and the qualitative comments. Despite a statistical result indicating that a majority of respondents consider the disclosures N1 to N5 feasible on the preparers side and essential on the user's side, the content of the comments is indicating the opposite, requiring substantial simplifications and indicating complexity and preparatory costs both on users and preparers side. Concerns were stronger in the comments of business associations both on the users and the preparers side, specifically for N2, N3 and N4 that banks associations considered not needed. N2 and N3 were considered complex by preparers associations.

31. On the question (Q26 for preparers only) if they anticipate to apply the Narrative-PAT module, having implemented policies, actions and targets (PAT) due to requests by counterparties in the value chain, the answers were split between yes and no. A tiny majority (51%) answered that this was not the case, as the request of counterparties in the value chain is seen as an additional argument since every company needs such a strategy anyway. However, many believed that counterparties have no interest in the Narrative-PAT module, but only in Basic Module and Business Partner Module.

32. On the question (Q27 for users only) if users considered that some datapoints were missing in the Narrative PAT Module, the majority of respondents answered that this is not the case.

33. On the question (Q28) about N3 (disclosure of policies, actions and targets to manage material sustainability matters) and if respondents would see potential for better alignment with other reporting schemes such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009), there were split views and a relatively lower response rate compared to other questions. Respondents indicated being not familiar with EMAS and other schemes.

34. On the Business Partner module and the question (Q29) related to the inclusion of greenhouse gas (GHG) Scope 3 emissions as additional component (entity-specific) being material in certain sectors, a majority of respondents agreed that scope 3 should be included, the most supportive being users. Preparers indicated that additional sector guidance or calculation/software would be needed. SME associations state that it is highly difficult, and they do not support its inclusion in the standard. Users also suggested EU database and allowing use of proxy emission factors and industry averages to enable SMEs (the EFRAG Secretariat notes that the use of proxies it not only a possibility in the standard but what it is expected in general to be used). The group "other" expressed lowest support.

35. On the question (Q30) regarding **each of the disclosures in the Business Partner module, for preparers if they are feasible or difficult to prepare and for users if they are essential or not necessary**. Most of the preparers indicated that BP1, BP2, BP10 and BP11 are feasible, while BP5, BP6, BP8 and BP9 were considered feasible by the majority of preparers. On BP3, BP4 and BP7 there are split views with half of the preparers considering it feasible, and the other half difficult. On the users' side, BP1, BP2, BP3, BP4, BP5 and BP8 were considered essential by most. BP6, BP7, BP8 and BP10 were considered essential by a majority but needed some simplifications. BP11 was considered not necessary by users. Banks associations considered BP2 and BP10 not needed. In general respondents requested more guidance/instructions or calculation tools. There were also requests to drop "materiality" in this module and put everything as "if applicable".

36. On the question (Q31) to users if they agreed with the **approach** that in Business Partner modules disclosures are reported **if applicable**, **with the exception of BP 5, 7, 8, 9, 10 that are omitted when considered not material,** the majority of users did not agree. The majority (especially banks) preferred to remove materiality from the module and have all disclosures "if applicable" a few also mentioned the option "report if you have".

37. On the question (Q32) **regarding BP7, BP8 and BP9 (human rights**) and alignment to the Sustainable Finance Disclosures Regulation (SFDR) and whether there would be alternative or more suitable disclosures, the majority of respondents were supportive of the SFDR alignment or could not propose alternatives. Both users and preparers asked, however, for

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simplifications (i.e. referencing existing national regulations or standards instead of international frameworks, move BP7 to Basic and reformulate under HR, merge and simplify BP8 and BP9).

38. On the question (Q33) if it would be beneficial **to split the Business Partners (BP) Module into sub-modules** depending on the nature of the user (for example "banks", "investors", "large corporates"), there were split views with a tiny majority (52%) in favour of the split. The arguments in favour were improve utility of the information, the arguments opposed were that division in sub-modules would over complexify. Associations of both prepares and users banks were in favour of split.

39. On the question (Q34) **regarding datapoints related to the EU-taxonomy regulation** considering the work of the Sustainable Finance to make a proportionate tool for EU-taxonomy available, the majority of respondents was not in favour. Many commented that it would be too complex and difficult to understand the taxonomy for SMEs, given their limited resources. General suggestion to postpone this, recognising that it may enhance market opportunities for SMEs.

40. On the question (Q35) about **the guidance developed for the Business Partners Module** and whether respondents considered it useful and sufficient, the majority agreed that this was the case. Some pointed out remaining concerns on language, calculation complexity, sector-guidance, need for clearer definitions and hyperlink, online tools to guide navigation and reporting.

41. On the question (Q36) for users whether **there any datapoint(s) were missing** from this module that users consider as essential to meet their information needs, the majority of respondents disagreed and considered that no additional datapoints were needed. Some suggested to provide distinction between data related to own operations, clients (downstream), and suppliers (upstream), another suggestion was to foster data accessibility and national authorities to identify which VSME points are already covered by national regulations, so companies quickly know if they comply with VSME via local laws.

42. On the question (Q37) for users whether **Appendix C** is clear, all the respondents mentioned that Appendix C is clear and helps reconcile the data points in VSME ED. On question (Q38) asking users whether the **VSME ED can replace the existing ESG questionnaires if additional datapoints are added,** a slight majority agreed with the question. However, a slight majority of banks/ investors stated otherwise.

43. Questions 39 and 40 provided the possibility to respondents to submit additional comments for topics that they were no questioned about but rather wished to express their opinion none the less. These comments are more general and can be found at the respective detailed answers.

Part 3

44. Concerning the **two questions on the value chain cap** (Q41 and Q42)[21], a majority of preparer and user respondents agree with current value chain cap. However, national and European SME associations as well as a majority of standard setters disagree and requested that VSME be the cap.

Overview of public consultation respondents

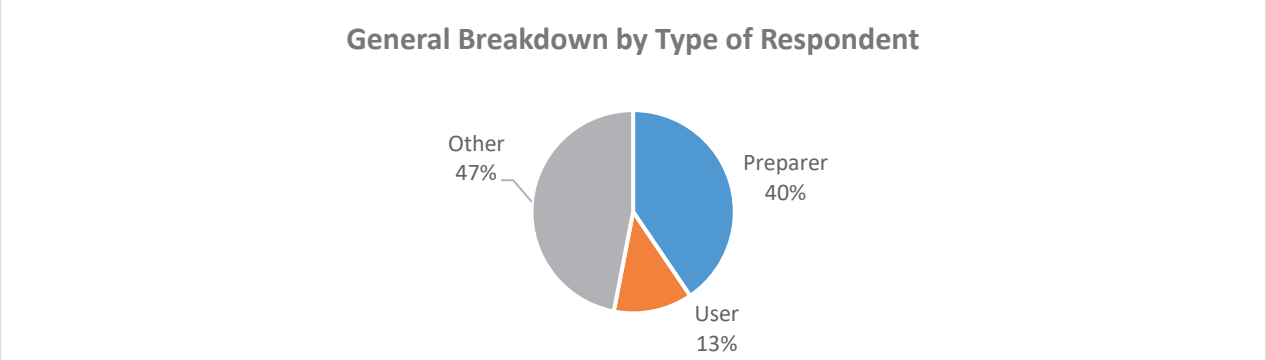
1. EFRAG registered 311 respondents to the online public consultation questionnaire.

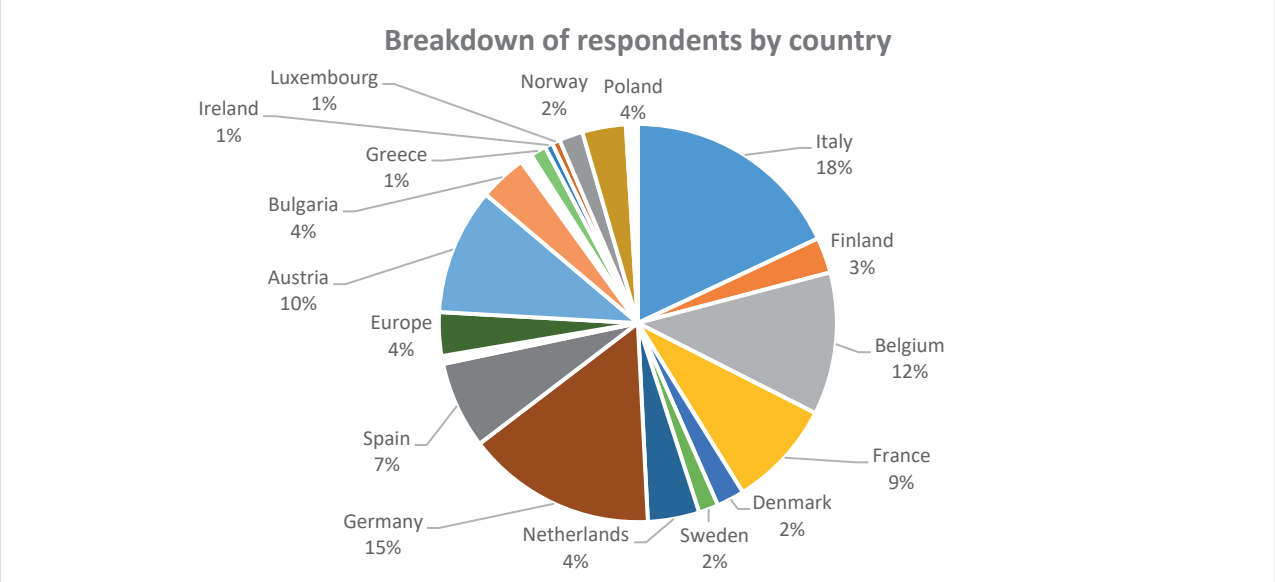
General Breakdown by Type of Respondent	Number of respondents
Preparer	126
User	39

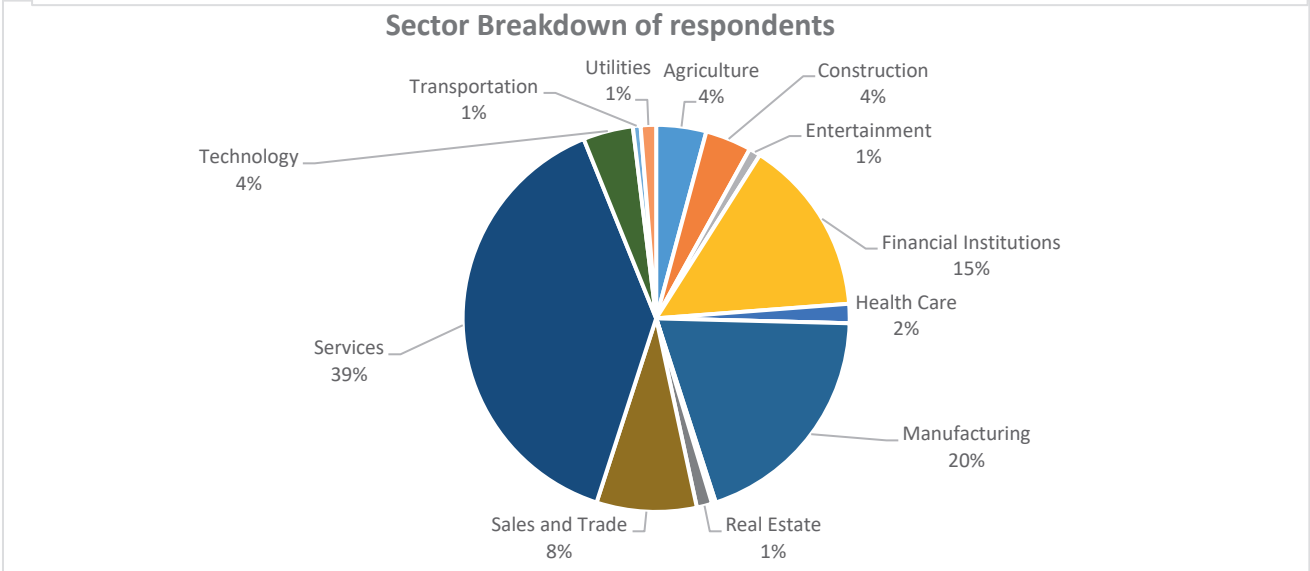
[21] Please note that there are two different pools of respondents to Value Chain Cap questions. Here we consider the feedback of those that replied to VSME consultation.

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Other	146[22]

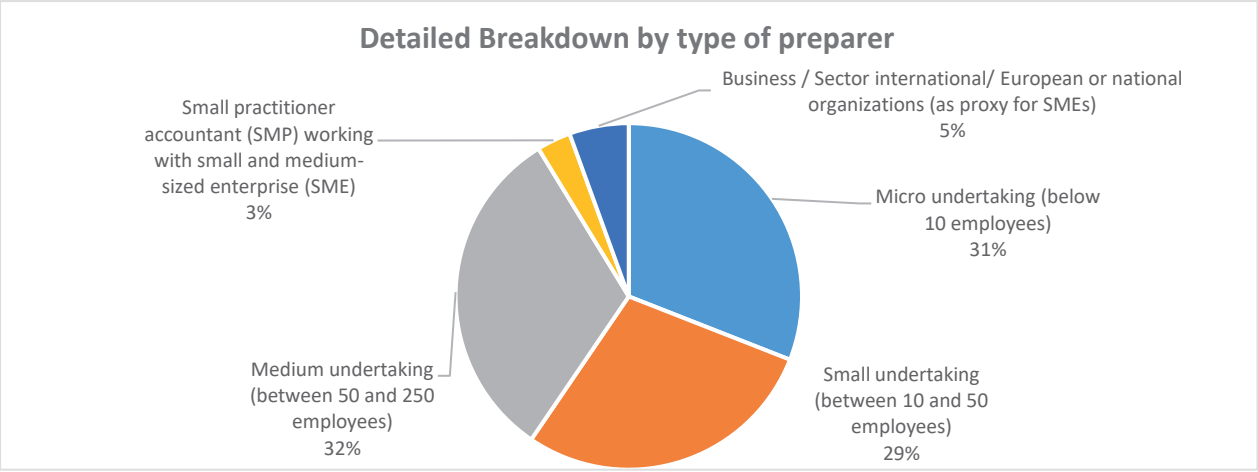


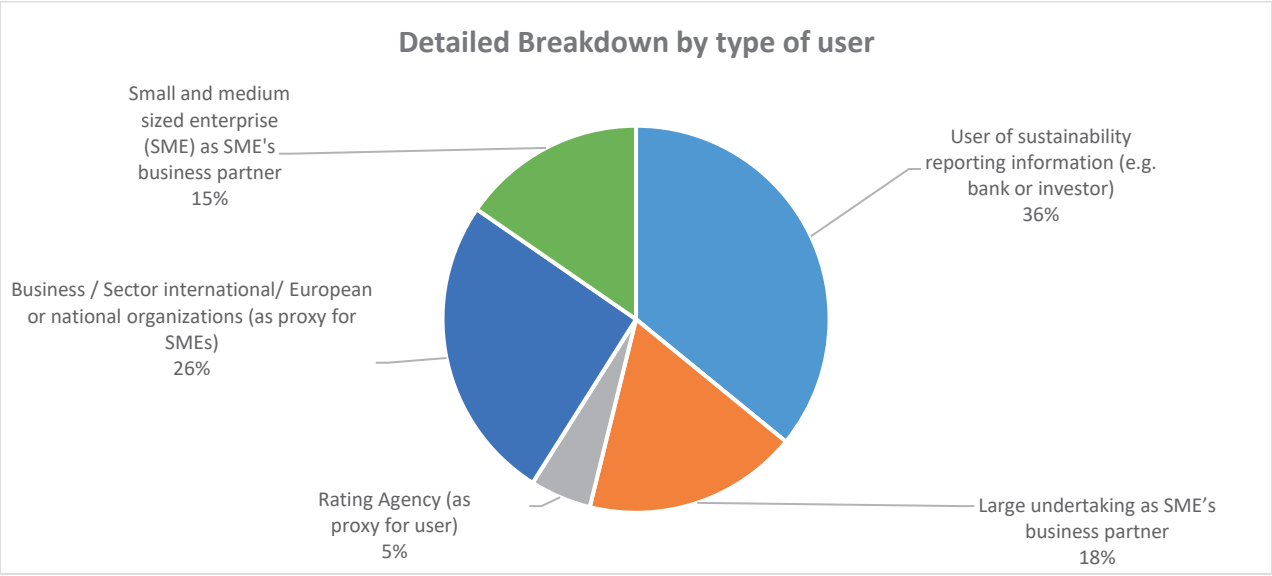


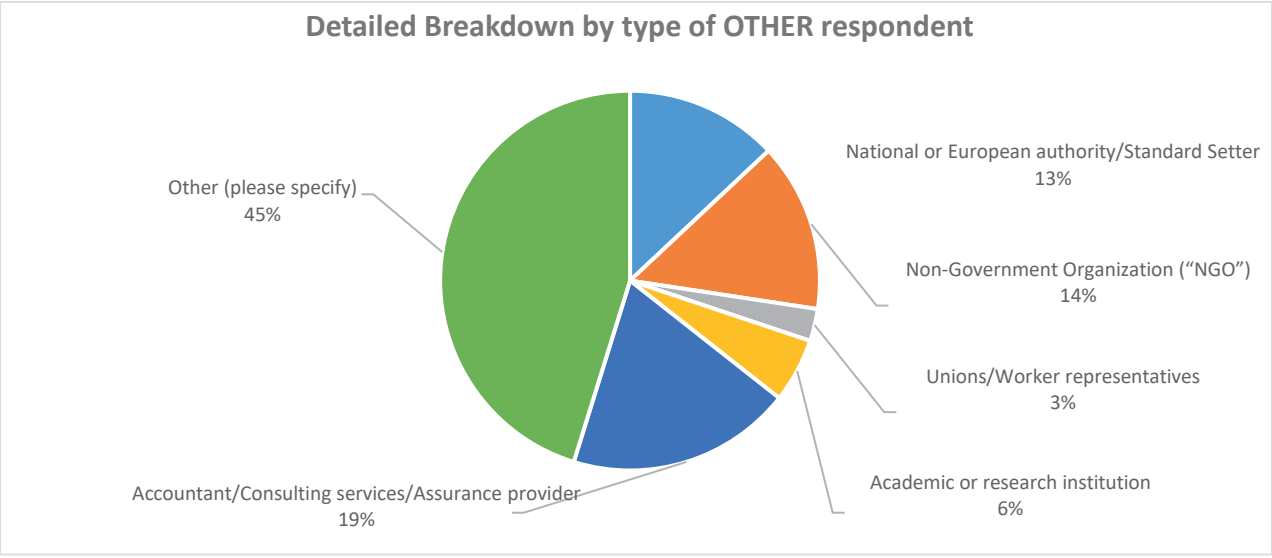


[22] The category 'Other' includes also business associations representing preparers or users, but that did a self-classification under "other, if other please specify". Hence, they have identified themselves not as preparers or users. EFRAG Secretariat considered that a reclassification could not be implemented without disrupting the analysis, as the category preparers and users had specific questions in the survey's questionnaire, different form the category "others".

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Annex 12: Field test – Key findings

About this summary

1. This summary includes results from the field test workshops (in total 10 plus 4 individual interviews) that were organised by EFRAG secretariat to discuss respondent's written surveys. In addition, EFRAG secretariat has conducted a specific workshop with ESG data platforms (who match online demand and supply of ESG data) participating in the field test of the VSME ED. These platforms have provided aggregated written feedback from their constituencies that are prepares (SMEs) and users (large corporates or banks as SMEs business counterparts) that can be found in specific tables of this report.

2. For each question the analysis includes insights at the aggregated level and insights by stakeholders' group (micro, small, medium preparer, consultants, rating agency, accountants, users including banks and large corporates heads of supply chains, etc.).

3. The link to the detailed feedback from the field test can be found here.

4. This report uses the following terms to describe the extent to which particular feedback was shared by respondents (both when referring to total respondents or a subset of respondents).

Most: 80% to 99% of respondents
A majority: 50% to 79% of respondents
Some: 20% to 49% of respondents
A few: 1% to 19% of respondents

5. From the preparers' perspective, the participation to the field test has taken two forms: (a) the actual preparation of (or part of) the disclosures in VSME ED, answer to the field test questionnaire and participation to workshops and/or interviews with EFRAG Secretariat; or (b) (simplified approach) pre- preparation (such as assessment of the challenges and benefits deriving from the disclosures in VSME), answer to the field test questionnaire and participation to workshops and/or interviews with EFRAG Secretariat.

6. From the users' perspective, the participation to the field test required to answer the field test questionnaire and to participate to workshops and/or bilateral interviews with EFRAG Secretariat.

7. The field test focuses on the following key elements:

   (a) The costs and challenges associated with each of the disclosures

   (b) The understandability of the guidance provided in the ED and its ability to support the implementation of the disclosure requirements; and

   (c) The expected benefits of the disclosures.

8. Preparers could choose to test one or more of the following modules: i) Basic Module; ii) Narrative-PAT Module; iii) Business Partners Module. The application of the general principles for the preparation of the sustainability report is considered as part of each module.

9. A prerequisite to participation in the field test was the completion of the consultation questionnaire as well as the field test questionnaire. The deadline for submitting answers to the field test was 21 April 2024. The field test workshops and interviews tool place in May 2024.

10. The analysis and structure of this report has been carried out by analysing the 5 questions from the field test. The same five questions have been asked for each module as follows:

Q1 – The operational challenges posed by the disclosures of each of the three modules.

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Q2 – The difficulty of disclosing the metrics of each single disclosure (analysed by module). This question was directed to PREPARERS.

Q3 – The costs brought by disclosing for each module.

Q4 – The relevance of the disclosures (per module). This question was directed to USERS.

Q5 – The benefits brought by the VSME. This encompasses a variety of factors analysed in the sections in the detailed report.

Summary of the key findings

11. The participation in the field test involved a total of 111 preparers (micro, small and medium undertakings), 24 proxy for prepares and 29 users or proxy for users.

12. Four ESG data platforms were also involved in the field test through a dedicated workshop and a dedicated questionnaire template document, i.e. each platform has implemented VSME ED to collect real disclosures from members using a tailored data model. This corresponds as well to their intention to adopt VSME in the future as structured data model to collect ESG information from members. They gave both a preparer and a user-based perspective, reflecting the existence of two different types of users.

13. These platforms represent all together over 23,000 SMEs across Europe and over 100,000 large undertakings worldwide. They therefore provide a rather significant perspective on the difficulty and relevance of various disclosures. Concretely the platforms tested VSME ED by replacing it with their current online questionnaires. Through this process over 600 SMEs participated in the field test. For these reasons, platform field tests results have been provided separately in this report.

14. There is wide support for the Basic Module (30% of field test participants have chosen to use the Basic Module only, and all others either used it in combination with the Narrative PAT Module or with the Business Partner Module or both). The Basic Module is assessed to be both feasible from the preparer's point of view and useful from the users' point of view.

15. There are, however, requests for additional guidance on methodologies and online calculation tools for certain metrics (i.e. B3- Energy and Greenhouse Gas Emissions, B6- Water or B7 - Resource use, circular economy and waste management) or to add definitions for others (B10 Workforce – Remuneration, collective bargaining and training).

16. For some disclosures such as B5-Biodiversity or B11-Workers in the value chain, affected communities, consumers and end-users, the requests are either to remove those disclosures or replace part of them with other metrics.

17. In general, it was suggested to use more explicit formulation on "if applicable" (i.e. for B4). Many preparers underlined that certain disclosures are not applicable to them, and thus, they are not reported (i.e., omitted). On the other hand, the users asked that in case of omittance of a data point because it is not applicable, it shall be clear in VSME ED that this information shall be considered not material by users.

18. For the Narrative PAT Module there is a general indication that this module presents some operational challenges from the preparers' perspective. The biggest challenge connected to this module is the materiality analysis, and consequently, the disclosures N2 – Material sustainability matters and N3 – Management of material sustainability matters are perceived as to be of great difficulty. The main reason is that SMEs tend to be less equipped and would need the help of consultants or, alternatively, a very basic fundamental step-bystep guidance for materiality analysis, with very visual explanations and an online scroll-down menu to choose from. A pre-defined grid of material matters by sector was considered an important addition to help SMEs. The involvement of the top level in the process is also considered an issue as this module is connected to strategy and governance and requires stakeholders' engagement. Concerns about materiality are expressed both on the preparers and users' sides. Despite materiality remaining a relevant disclosure for certain user categories (e.g. large undertakings), users understand the difficulty it poses to SMEs. Banks/ investors have highlighted concerns associated with materiality analysis, acknowledging the complexity of this analysis for SMEs. As such, they indicated generally preferring a replacement of the undertaking materiality

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analysis with a pre-defined list of sustainability matters by sector. This practice is adopted by some banks/investors as emerged in the workshops.

19. Conversely, N5 – Governance: responsibilities in relation to sustainability matters, appears to be perceived as a disclosure of low difficult, with high relevance for users, highlighting its importance within the module.

20. N1 – Strategy: business model and sustainability – related initiatives and N4 – Key stakeholders, appear to be disclosure of low difficulty, similarly to N5. However, N1 and N4 appear to have a lower relevance compared to N5 for users.

21. Overall, the Narrative-PAT Module and the Business Partners Module are perceived to have greater language complexity compared to the basic module.

22. Concerning the Business Partner Module, respondent preparers indicated some operational challenges, with a diversified view according to the various disclosures. Some disclosures such as BP1 - Revenues from certain sectors BP2 - Gender diversity ratio in governance body, BP6 - Hazardous waste and/or radioactive waste ratio, BP10 – work-life balance and BP11 – number of apprentices were considered of low difficulty by the majority of respondents.

23. However, from the user perspective BP10 – Work-life balance and BP11 – Number of apprentices have relatively low benefits.

24. Other disclosures like BP3 – GHG emissions reduction target, BP4 – Transition plan for climate change mitigation, BP5 – Physical risks from climate change, were considered of high or medium difficulty by the majority of the respondents. Arguments concern the difficulty linked to target settings (science-based) for SMEs and request for adapted or simplified guides and frameworks (i.e., climate transition plans, scenarios, physical risks).

25. From the users' perspective, BP3 is considered of high relevance by most respondents and BP4 by a majority, and BP5 is considered of medium to low importance by some especially in terms of reliability/quality of disclosure.

26. For BP7 – Alignment with internationally recognised instruments and BP8 – Processes to monitor compliance and mechanisms to address violations, preparers' views are split between low, medium, and high difficulty. The main challenges are related to legal complexities and overlaps in reconciling undertaking policy with international instruments as well as EU/national laws. Hence examples or guidance on those may increase the uptake.

27. Most of the preparers consider BP9 – Violations of OECD Guidelines for Multinational Enterprises or the UN guiding Principles as straightforward with information being relatively easy to obtain and thus seen as low in difficulty. From the users' perspectives, BP7 was perceived as of high relevance, while on BP8 there were split views on its relevance (between medium and high relevance) and for BP9 there was less support for its relevance (split between low, medium and high).

28. In general, there were requests to clarify the application of materiality analysis for this module.

29. On the costs side, respondents indicated that costs are generally higher for the first year, driven by HR costs, consultancy and IT tools. As companies gain experience and establish processes, the need for consultancy decreases, leading to lower costs in subsequent years (generally halved costs). Especially consultancy and IT costs seem to drop significantly. Many undertakings expect high costs in the first year to obtain in-house expertise and training for existing personnel. While these costs are expected to decrease in subsequent years, they will remain important.

30. On the benefit side, different types of benefits were perceived depending on the module. Most of the BM respondents stated that the main benefits (preparers and users combined) of the basic module are the synergies and increased awareness module. Most (preparers and users combined) of the Narrative-PAT module respondents stated that the main benefit this module brings is the increased awareness and monitoring of sustainability issues, in addition these respondents stated that it brings them greater access to finance. Regarding the BP module, preparers and users (combined) stated that this module brings them benefits related to having access to more clients and better market positioning / competitiveness. The perceived types of benefits brought by the BP module were estimated to bring similar benefit estimations. Users

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specifically mentioned that the BP module is most beneficial with regard to the synergies it brings with other questionnaires.

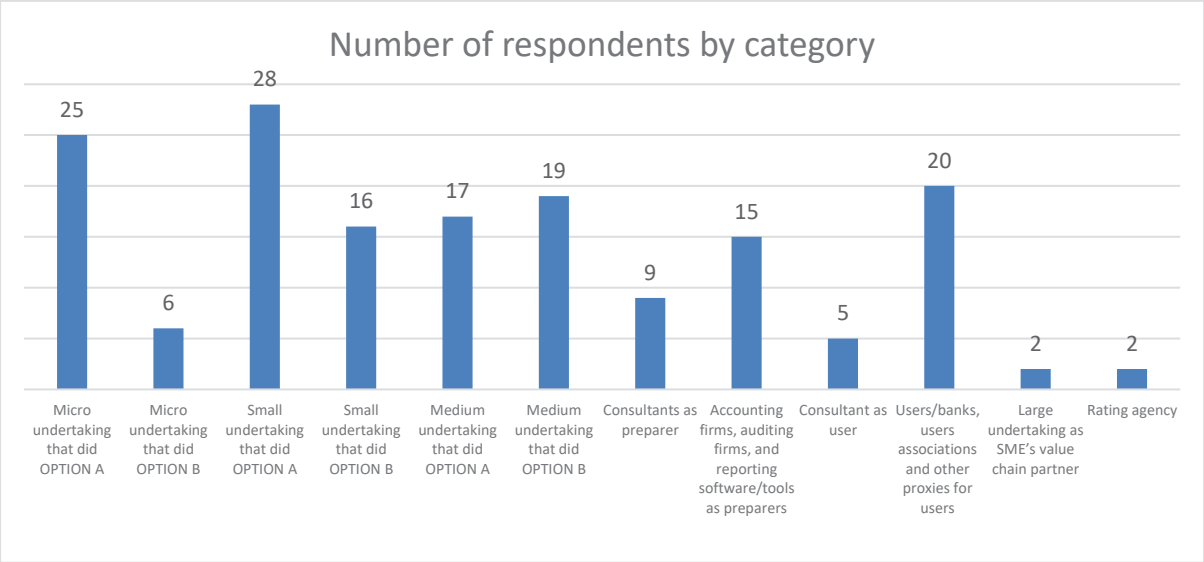
31. Finally, regarding the feedback from the online ESG data platforms (4), which represent multipliers of the users' and preparers' perspectives, the key messages are as follows. Platform preparers showcased a generally higher level of disclosure difficulty on disclosures B3, B4, B5, B11 in the Basic Module and disclosures BP3, BP4, BP5 in Business Partners Module. Essentially, these disclosures (apart from B11, which is a social metric) are heavily linked to environmental metrics. These are appearing as more challenging to disclose compared to other social metrics. Additionally, materiality, especially N3, has shown to be challenging. These difficulties were higher for smaller undertakings.

32. The most relevant disclosures for platforms were B3, B6, B9 in Basic Module and disclosures BP3 and BP4 in Business Partners Module. These disclosures were highlighted as very relevant metrics. Other disclosures from the Basic Module and Business Partners Module were generally perceived as of high to medium relevance. The only disclosure deemed of low relevance by half of the platforms was B11.

33. The relevance perceived for the disclosures in Narrative-PAT Module by platforms was split. Half considered N1 to N5 relevant, the other half considered it of either medium or low relevance. With N5 being the most relevant. 1 platform respondent stated that N1-N4 have low relevance currently as they are not collecting those metrics.

General overview of field test respondents

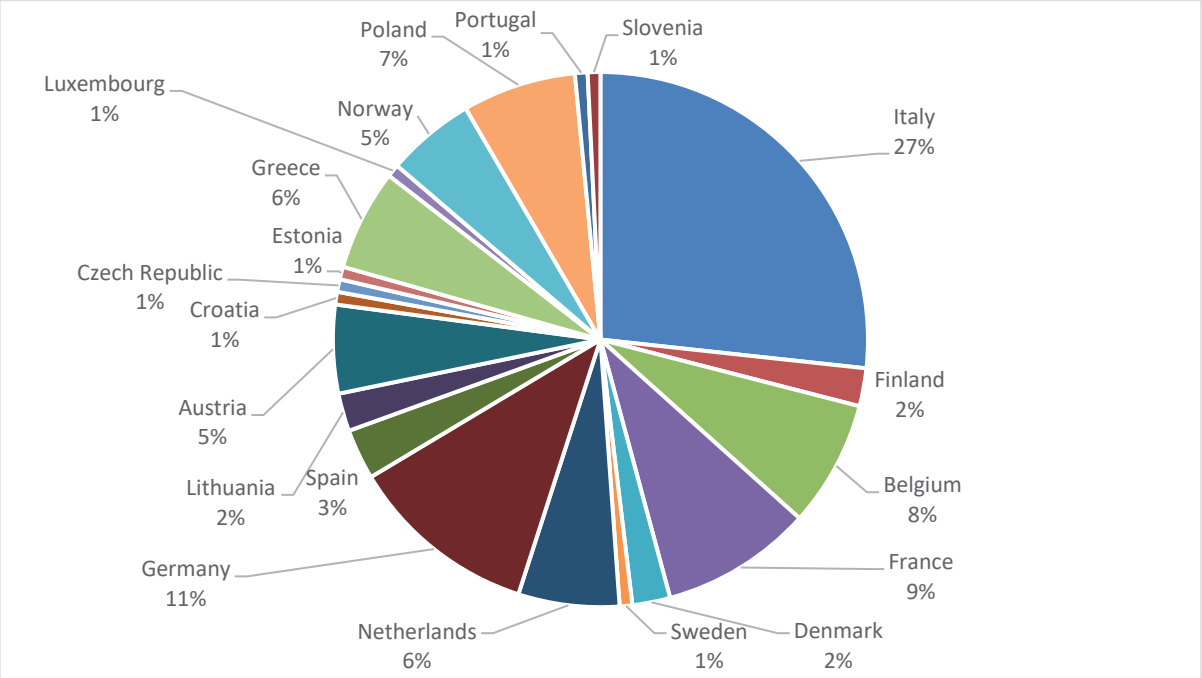
Breakdown by category



Total Number of Field Test Respondents: 164

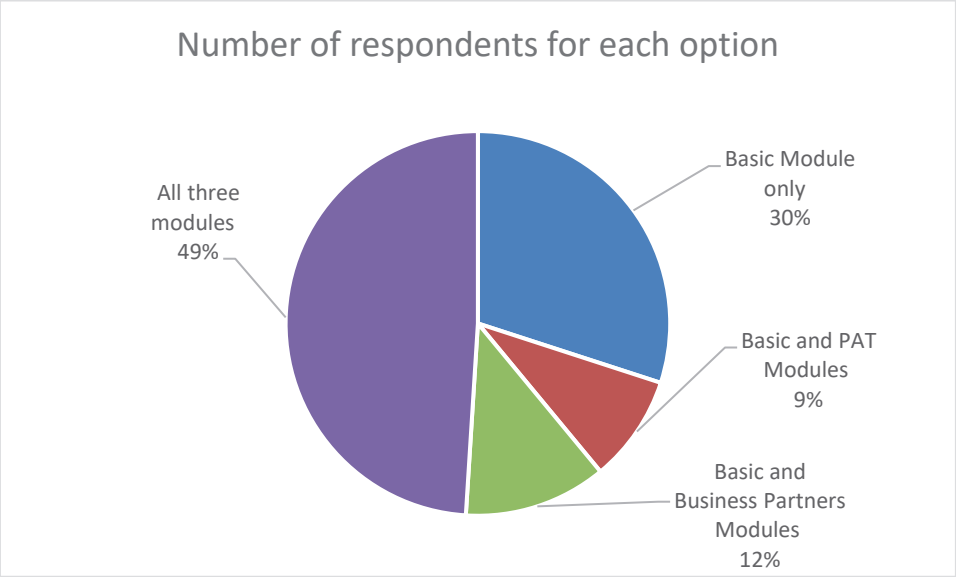
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Breakdown by country



Breakdown of respondents with modules chosen:

Module chosen	Number of respondents that selected this option
Basic Module only	50
Basic and PAT Modules	20
Basic and Business Partners Modules	14
All three modules	80



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Annex 13: Executive Summary of Comment Letters Only - VSME ED Public Consultation

About this summary

1. EFRAG Secretariat has received 22 Comment Letters outside the online survey (2 of which were not published for confidentiality purposes). The result of the analysis of those letters have been summarised in this Detailed Report. Please note that 19 of the 20 comment letters refer to associations, standard setters or authorities and not to individual stakeholders. As such their weight has been considered when describing the trends in the overall conclusions.

2. This summary is organised by stakeholders' group as follows: "preparers" (business associations representing SMEs), "user" (a rating agency) and "others" (associations of accountants, standard setters, academic and authorities).

3. The link to the detailed feedback from the comment letters can be found here.

Executive Summary of feedback received outside online survey, via comment letters

4. **From the analysis of the comment letters received outside the online questionnaire, the following key messages emerged.**

5. **General feedback** on **VSME ED's objective** and its role to replace business questionnaires: the business associations representing **preparers** indicated their support for VSME as a tool to make reporting manageable and replace business partners questionnaire, but further simplification is generally needed. Suggestions included: i) language simplifications, ii) online reporting template (platform) to facilitate the exchange of info and make the standard more interactive; iii) add examples; iv) avoid references to external links (i.e. the WRI's Aqueduct Water Risk Atlas or the GHG protocol) or make sure that translation in all EU language is available; v) education support to implement VSME needed. Another suggestion was to add in the objectives that another "business counterpart "of the VSME are public authorities (i.e. sustainability information for public tenders). The **user** (rating agency) was supportive of the VSME as reporting tool and to replace business partners questionnaires to an extent but considered that business partners would still require 3rd parties to engage with SMEs, including through questionnaires, to: i) analyse the data based on their specific needs or ii) provide an opinion on the level of performance disclosed by SMEs. **Standard Setters** and **Accountants** associations generally supported the role of the VSME as a simple reporting tool, one standard setter mentioned the replacement of business partners questionnaire may be relatively low. **Authorities**: generally supported VSME as it will allow SMEs to benefit from a standardized and simple reporting framework.

6. On the **Architecture and modular approach**: business associations preparers expressed preferences for Basic Module; one business association expressly asked to stick to Basic Module only and proposed it being composed of 12 metrics (see agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey)). Another indicated that SFDR datapoints shall not be included in Business Partner Module. Another asked to clarify in case of omittance because "not applicable" how CSRD companies will be able to deal with it. **User rating agency** agrees that the module combinations are adequate to accommodate the different needs. **Standard setters** support the modular approach and the flexibility. One standard setter asked for SMEs to provide information when they choose to change the adopted modules. **Accountant** associations overall supported the modular approach but two of them highlighted that the Basic Module alone would not be sufficient to cover information requests and a combination of Basic + BP Module would be necessary. **Academic**: support the modular approach, but VSME is too detailed. Authorities also support a modular approach. Some underline the importance to develop open access tool to facilitate reporting. There was one suggestion to split Business Partners Module in sub-modules according to the type of counterparts needs (bank, investor, supply chain/larger/smaller). Another suggested that some datapoints could be deleted while others shall be added.

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7. **Materiality**: business associations **preparers** indicate that materiality remains difficult. There are suggestions to remove or provide more sector guidance. One suggests replacing it with a "comply or explain" approach to reduce the cost of preparation. There is **no comment from the user rating agency** on this. **Standard setters** indicated that the materiality analysis is difficult but could be kept as risk management tool for SMEs and because it only applies to PAT module, i.e. undertaking who already have PAT in place. They requested simplification and adapted guidance. **Accountant** associations deem that simplified guidance should be provided for materiality analysis being highly difficult for SMEs to understand (flow chart type) and suggest adding positive impacts. One suggests removing materiality analysis and replace it with the "if applicable approach". **Academic**: no specific views on materiality but agreement with the "if applicable approach" to replace materiality in the Basic Module. **Authorities** see the materiality as complicated. Recommendations: i) replace with interactive online tool based on Appendix B, ii) SMEs to provide brief explanations for their sustainability topic selections based on their activities and context, ii) list of sustainability matters by sector.

8. **Consolidated reporting and subsidiary exemption**, only **preparers** commented by supporting it, some indicate that due to voluntary reporting, it would be up to the companies to decide on consolidated report or gradually include subsidiaries.

9. **Timing and location**: one business association **preparer** asks to broaden reference to "other documents" also to mandatory public controls of the sustainability objectives (e.g. the verification by inspectors or public auditors of the democratic or worker/users-participated governance)". One **authority** suggests ensuring that the sustainability report shall be prepared on annual basis (alignment with Pillar 3 framework).

10. **Sector-specific dimension**: business association **preparers** support sector specific guidelines designed for non-listed SMEs. This is also supported by the user rating agency. One **standard setter** suggested that if and when EFRAG develops a sectorial ESRS adapted to SME, reference to sector in the VSME (i.e. B6, B7, BP1, BP3 among others) may need to be deleted. **Accountants** support sectors guidelines to apply both listed and non-listed SMEs, one emphasises the need to develop an implementation guidance outlining material sustainability issues per sector. **Authorities** suggest increasing the focus on sectors and provide guidance on this basis: in particular, simplify the materiality analysis by drawing up a brief guide to clarify the main material issues by sectors and by specifying how to conduct a simplified materiality assessment for SMEs.

11. **Value chain cap**: business associations **preparers** indicate that VSME should serve as "value chain cap" to ensure maximum amount of the VSME data that reporting entities can request. The user rating agency supports the value chain approach adopted by EFRAG; undue effect is not expected from ESRS reporting. **Standard setters** have split views. One standard setter agrees with LSME being the value chain cap, the other suggest VSME to be the value chain cap. An **accountant** highlighted that VSME should be the Value Chain Cap and called for greater alignment between ESRS LSME and VSME. **Academic** had no comments. **One authority** suggests that VSME could be better placed than LSME ESRS for the "cap in the value chain" role.

12. **EU Taxonomy**: one **preparer** suggests that VSME should not include additional data points to cover EU Taxonomy disclosures as the simplified methodology is work in progress. One authority suggests adding a "taxonomy module" in BP Module, based on Sustainable Finance Platform streamlined approach.

13. On the **Basic Module**: business associations **preparers** request to further simplify disclosures to ensure SMEs are able to independently disclose BM datapoints without needing external ESG experts. Additionally, there is a request by preparers to avoid using external references to EMAS, international legislation/ standards and EU law as SMEs are no familiar with these technicalities. There was a general request by some preparers to delete B11 given its complexity. One preparer requested to delete B12. For B2 there were specific requests to add datapoint relevant for cooperative enterprises specific requests. With regard to specific disclosures, specific changes were requested for disclosures B3, B9, B10; these are available in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). The **user** (rating agency)

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suggested to provide an overview of the disclosures in VSME reported “if applicable”. To facilitate SMEs. In addition, the user analysed the disclosures that it is already covering through its own rating questionnaires. The disclosures that are partially or not currently covered in this questionnaire are: B4 (partially), B5, B6 (partially), B7 (partially), B8 (partially), B10 – B12 (partially). B3 and B9 are entirely covered. **Standard setters** asked to clarify the “if applicable” approach to be better understood in the various disclosures. Additionally, they suggested to move BP6 (BPM) into B7 (BM). For B11 Standard Setters suggested to add positive aspect as well. The more specific suggestions provided for the other disclosures can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). Accountants suggested to delete B11. Additionally requests to align ESRS S1 definition to B8, B9, and B10, expanding the VSME definition of own workforce. For other disclosures, accountants request for more simplifications and examples on top of specific requests that can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). **Academics** expressed no comments on the module. **Authorities** requested for simplified guidance for B3, B5 and B6. Specific requests on disclosure can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey).

Executive Summary of feedback received outside online survey, via comment letters

14. From the analysis of the comment letters received outside the online questionnaire, the following key messages emerged.

15. **General feedback** on **VSME ED's objective** and its role to replace business questionnaires: the business associations representing **preparers** indicated their support for VSME as a tool to make reporting manageable and replace business partners questionnaire, but further simplification is generally needed. Suggestions included: i) language simplifications, ii) online reporting template (platform) to facilitate the exchange of info and make the standard more interactive; iii) add examples; iv) avoid references to external links (i.e. the WRI’s Aqueduct Water Risk Atlas or the GHG protocol) or make sure that translation in all EU language is available; v) education support to implement VSME needed. Another suggestion was to add in the objectives that another "business counterpart "of the VSME are public authorities (i.e. sustainability information for public tenders). The **user** (rating agency) was supportive of the VSME as reporting tool and to replace business partners questionnaires to an extent but considered that business partners would still require 3rd parties to engage with SMEs, including through questionnaires, to: i) analyse the data based on their specific needs or ii) provide an opinion on the level of performance disclosed by SMEs. **Standard Setters** and **Accountants** associations generally supported the role of the VSME as a simple reporting tool, one standard setter mentioned the replacement of business partners questionnaire may be relatively low. **Authorities**: generally supported VSME as it will allow SMEs to benefit from a standardized and simple reporting framework.

16. On the **Architecture and modular approach**: business associations preparers expressed preferences for Basic Module; one business association expressly asked to stick to Basic Module only and proposed it being composed of 12 metrics (see agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey)). Another indicated that SFDR datapoints shall not be included in Business Partner Module. Another asked to clarify in case of omittance because “not applicable” how CSRD companies will be able to deal with it. **User rating agency** agrees that the module combinations are adequate to accommodate the different needs. **Standard setters** support the modular approach and the flexibility. One standard setter asked for SMEs to provide information when they choose to change the adopted modules. **Accountant** associations overall supported the modular approach but two of them highlighted that the Basic Module alone would not be sufficient to cover information requests and a combination of Basic + BP Module would be necessary. **Academic**: support the modular approach, but VSME is too detailed. Authorities also support a modular approach. Some underline the importance to develop open access tool to facilitate reporting. There was one suggestion to split Business Partners Module in sub-modules according to the type of counterparts needs (bank, investor, supply chain/larger/smaller). Another suggested that some datapoints could be deleted while others shall be added.

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17. **Materiality**: business associations **preparers** indicate that materiality remains difficult. There are suggestions to remove or provide more sector guidance. One suggests replacing it with a "comply or explain" approach to reduce the cost of preparation. There is **no comment from the user rating agency** on this. **Standard setters** indicated that the materiality analysis is difficult but could be kept as risk management tool for SMEs and because it only applies to PAT module, i.e. undertaking who already have PAT in place. They requested simplification and adapted guidance. **Accountant** associations deem that simplified guidance should be provided for materiality analysis being highly difficult for SMEs to understand (flow chart type) and suggest adding positive impacts. One suggests removing materiality analysis and replace it with the "if applicable approach". **Academic**: no specific views on materiality but agreement with the "if applicable approach" to replace materiality in the Basic Module. **Authorities** see the materiality as complicated. Recommendations: i) replace with interactive online tool based on Appendix B, ii) SMEs to provide brief explanations for their sustainability topic selections based on their activities and context, ii) list of sustainability matters by sector.

18. **Consolidated reporting and subsidiary exemption**, only **preparers** commented by supporting it, some indicate that due to voluntary reporting, it would be up to the companies to decide on consolidated report or gradually include subsidiaries.

19. **Timing and location**: one business association **preparer** asks to broaden reference to "other documents" also to mandatory public controls of the sustainability objectives (e.g. the verification by inspectors or public auditors of the democratic or worker/users-participated governance)". One **authority** suggests ensuring that the sustainability report shall be prepared on annual basis (alignment with Pillar 3 framework).

20. **Sector-specific dimension**: business association **preparers** support sector specific guidelines designed for non-listed SMEs. This is also supported by the user rating agency. One **standard setter** suggested that if and when EFRAG develops a sectorial ESRS adapted to SME, reference to sector in the VSME (i.e. B6, B7, BP1, BP3 among others) may need to be deleted. **Accountants** support sectors guidelines to apply both listed and non-listed SMEs, one emphasises the need to develop guidance outlining material sustainability issues per sector. **Authorities** suggest increasing the focus on sectors and provide guidance on this basis: in particular, simplify the materiality analysis by drawing up a brief guide to clarify the main material issues by sectors and by specifying how to conduct a simplified materiality assessment for SMEs. **Value chain cap**: business associations **preparers** indicate that VSME should serve as "value chain cap" to ensure maximum amount of the VSME data that reporting entities can request. The user rating agency supports the value chain approach adopted by EFRAG; undue effect is not expected from ESRS reporting. **Standard setters** have split views. One standard setter agrees with LSME being the value chain cap, the other suggest VSME to be the value chain cap. An **accountant** highlighted that VSME should be the Value Chain Cap and called for greater alignment between ESRS LSME and VSME. **Academic** had no comments. **One authority** suggests that VSME could be better placed than LSME ESRS for the "cap in the value chain" role. **EU Taxonomy**: one **preparer** suggests that VSME should not include additional data points to cover EU Taxonomy disclosures as the simplified methodology is work in progress. One authority suggests adding a "taxonomy module" in BP Module, based on Sustainable Finance Platform streamlined approach.

21. On the **Basic Module**: business associations **preparers** request to further simplify disclosures to ensure SMEs are able to independently disclose BM datapoints without needing external ESG experts. Additionally, there is a request by preparers to avoid using external references to EMAS, international legislation/ standards and EU law as SMEs are no familiar with these technicalities. There was a general request by some preparers to delete B11 given its complexity. One preparer requested to delete B12. For B2 there were specific requests to add datapoint relevant for cooperative enterprises specific requests. With regard to specific disclosures, specific changes were requested for disclosures B3, B9, B10; these are available in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). The **user** (rating agency) suggested to provide an overview of the disclosures in VSME reported "if applicable". To facilitate SMEs. In addition, the user analysed the disclosures that it is already covering through its own rating questionnaires. The disclosures that are partially or not currently covered in this

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questionnaire are: B4 (partially), B5, B6 (partially), B7 (partially), B8 (partially), B10 – B12 (partially). B3 and B9 are entirely covered. **Standard setters** asked to clarify the "if applicable" approach to be better understood in the various disclosures. Additionally, they suggested to move BP6 (BPM) into B7 (BM). For B11 Standard Setters suggested to add positive aspect as well. The more specific suggestions provided for the other disclosures can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). Accountants suggested to delete B11. Additionally requests to align ESRS S1 definition to B8, B9, and B10, expanding the VSME definition of own workforce. For other disclosures, accountants request for more simplifications and examples on top of specific requests that can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). **Academics** expressed no comments on the module. **Authorities** requested for simplified guidance for B3, B5 and B6. Specific requests on disclosure can be found in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey).

22. On the **Narrative-PAT Module**: **Preparers**: business associations preparers considered this module as too sophisticated/ complex for micro and small SMEs; only medium sized SMEs were considered to be capable of reporting this. Some preparers asked to remove this module from VSME due to complexity. For N1 one preparer suggested specific changes for cooperatives. For N4, phrasing suggestions were provided. For N5, there was a suggestion to omit governance-based questions as SMEs generally, do not have governance bodies. Instead, descriptive/ qualitative questions should be asked. The **User** (rating agency) indicated that all disclosures are partially covered by the rating agency's questionnaire. **Standard_setters** asked to clarify the "if applicable' approach. **Accountants** requested for the simplification of vocabulary. On N2 one accountant asked to delete financial materiality (too complex for SMEs). Some accountants also asked to move N4 – key stakeholder information to N2. **Academics** left no comments. **Authorities**: an authority suggests transforming this module into a Y/N close-ended question module. One authority supports the PAT but suggests some modifications as in agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey).

23. On the **Business Partners Module**: business associators **preparers** indicate relatively low support as they consider it too difficult without external support. With regard to BP1, BP8, and BP9 there is a suggestion to avoid referencing external sources. Data requests for BP1 – BP5 and BP7 – BP10 were perceived as not fit/ adapted for SMEs. Some respondents view BP3's scope 3 data point as too complex. Some suggest the need to provide an "EU GHG calculator" for scope 3 approximations that SMEs can use. For BP4, BP8 and BP9 there is an emphasis in omitting external references within the standard. On the user (rating agency) side, BP2, BP3, BP6 and BP9 are fully covered disclosures. BP4 and BP8 are partially covered. BP1, BP5, BP7, BP10 and BP11 are not covered; for the Narrative PAT Module, N1 to N5 are partially covered, one difference is that their questionnaire includes predefined list of actions on sustainability matters tailored for size/sector. **Standard setters** asked for generally specific changes visible in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). **Accountants** found BP7, 8, & 9 to be a significant preparatory cost for SMEs. Additionally, accountants found BP10 and BP11 irrelevant; one suggested to delete BP10. The suggestion to merge BP3 and BP4 into one disclosure was also brought forth. Other specific changes can be consulted in the agenda paper 05-05 – Detailed feedback from comment letters (outside online Survey). **Authorities** suggested to provide specific cross-referencing to all relevant EU legislations (Pillar 3 ITS templates, SFDR datapoints, and EU Taxonomy Regulation KPIs) to facilitate the access of information for all market participants. The importance of the datapoints of this module was also underlined. SFP recommended to keep BP7, BP8 and BP9 within the Business Partner Module as the DRs encompass the provisions outlined in Art.18 of the Taxonomy Regulation which mandates undertakings to incorporate SMEs in their human rights due diligence processes when engaging in business with them.

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Annex 14: Public Consultation - VSME ED Questionnaire

Questionnaire VSME Exposure Draft

EFRAG Public Consultation – January 2024

DISCLAIMER

This questionnaire supports the development of the Exposure Draft for a Voluntary Standard for non-listed SMEs ('VSME ED'). The purpose of this consultation is to collect feedback from a variety of stakeholders on of its content.

The VSME ED is the result of EFRAG SRB and SR TEG discussions and includes inputs from EFRAG Expert Working Group and the EFRAG VSME community as well as stakeholders outreach events. This work benefits from the research conducted by the SME working group "Cluster 8" of the EFRAG Project Task Force on European sustainability reporting standards. The following background documents are included in the package (Annex 1 and 2 available here) to help respondents framing their responses:

- **Annex 1: VSME ED**
- **Annex 2: Basis for conclusions for VSME ED** illustrating the reasoning behind the content of the ED.
- **Annex 3: Approach to Value Chain Cap in ESRS LSME ED and VSME ED (link)**

Deadline for answer is 21 May 2024 (EoD)

SURVEY INTRODUCTION

Thank you for taking the time to complete this survey.

The purpose of this survey is to receive feedback from constituents on the VSME ED. The feedback will be collated by EFRAG Secretariat and analysed by EFRAG SR TEG and SRB to finalise the VSME draft for delivery to the European Commission ('EC').

Why VSME? EFRAG's work on a voluntary standard for non-listed micro, small and medium undertakings is outside the Corporate Sustainability Reporting Directive (CSRD).

As specified in the EC Q&A accompanying the adoption of the Delegated Acts ESRS in July 2023, EFRAG is developing a simpler, voluntary standard for use by non-listed SMEs to enable non-listed SMEs to respond to requests for sustainability information in an efficient and proportionate manner as well as to facilitate their participation in the transition to a sustainable economy. The EC SME Relief Package of September 2023 refers to the VSME ED as a measure to support SMEs in accessing sustainable finance VSME ED will allow non listed SMEs (including micro) to face growing requests for ESG data and to lower the entry barrier to reporting. In addition, undertakings with no company statute (self-employed) are expected to use this VSME. The benefits of VSME will depend on market acceptance and recognition that the VSME ED is suitable to replace a substantial part of the various questionnaires (from lenders, corporates, investors) currently used to collect such information from SMEs.

Micro, small and medium undertakings are in number the vast majority of enterprises in Europe.

General approach to users' needs: When answering to the questions in this Survey and assessing the appropriateness of the proposed disclosures, respondents are invited to consider the perspective of the users' needs of this particular ED (users being primarily SMEs' business partners, i.e. lenders, other investors, corporates) and to take into account the capacities of the SMEs, especially as they are not in the scope of the CSRD. Such information is also expected to support the perspective of public interest.

In this questionnaire, if not differently specified, the terms "SMEs" and "undertaking(s)" refers to non-listed micro, small and medium undertakings in the scope of VSME ED.

If you have no opinion on a question you can skip the question.

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INFORMATION ON SURVEY PARTICIPANT

First Name: _____

Last Name:_____

Name and Type of organization (Preparer, User, Other): _____

Preparers are identified as those which choose to prepare a sustainability report under the VSME ED.

Users are identified as those using the sustainability information produced by applying VSME ED (in particular those are investors, lenders, large undertakings as SME's value chain partners).m

- **If preparer:**
  - does your undertaking have a company statute? Yes/No.
  - are you subject to requirements to publish annual accounts? Yes/No.

- **If preparer,** please specify whether you are a:
  - Micro undertaking (below 10 employees)
  - Small undertaking (between 10 and 50 employees)
  - Medium undertaking (between 50 and 250 employees)
  - Small practitioner accountant (SMP) working with small and medium-sized enterprises (SMEs)
  - Business / Sector, international/ European or national organizations (as proxy for SMEs)
    - Specify which sector.
- **If user**, please specify whether you are:
  - User of sustainability reporting information (e.g. bank or investor)
  - Large undertaking as SME's business partner
  - Rating Agency (as proxy for user)
  - Public authority in processing sustainability information for tenders
  - Business / Sector, international/ European or national organizations (as proxy for SMEs)
    - Specify which sector.
  - Small and medium sized enterprise (SME) as SME's business partner
- **Other**:
  - National or European authority/Standard Setter
  - Non-Government Organization ("NGO")
  - Unions/Worker representatives
  - Academic or research institution
  - Accountant/Consulting services/Assurance provider
  - Other (please specify)

  "Other" respondents can choose to respond either as Preparers (proxy) or as Users (proxy). In this case, in addition they can provide complementary comments to cover the other perspective, using the last open question in Part 2 of the questionnaire.

Main country of operations (choose from menu)

Main sector of operations (choose from menu)

Depending on the group you have selected, you will be asked different questions.

SURVEY STRUCTURE

This survey is structured as follows:

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A) Part 1: VSME ED – General key questions (**CRITICAL, please consider answering all questions**) (If you only wish to complete Part 3, please page through the questionnaire to there).

B) Part 2: VSME ED – Detailed questions on principles and datapoints in the 3 modules (**ADDITIONAL, please complement your answers in part 1 by answering part 2 as much as possible**) (If you do not wish to complete this part, please page through to Part 3 on the Value chain cap or the submission page as relevant).

C) Part 3: Value chain cap (Separate section on the role of VSME and LSME in respect to the trickle-down effect) value chain cap as determined by the ESRS LSME) (Please note that here you are requested to choose whether you want to respond in brief on this topic or in a more detail. Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.)

You can choose to answer any part on its own or combination with the other parts.

Survey instructions

Some questions in the survey will appear depending on your previous answers or choices. You will now be able to save your responses before final submission. **Please note that EFRAG only considers completed surveys - partial submissions cannot be technically processed. You will receive an email with your response on submission.**

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QUESTIONS

PART 1: General Key Questions (CRITICAL)

Objective, simplifications and modules

Please refer to the text of VSME ED in Annex 1 and to the text of Basis for conclusions for VSME ED in Annex 2.

Q1. The objective of this ED is to provide a simple reporting tool, that can credibly replace a substantial part of the questionnaires used by business partners (lenders, investors and corporate clients) in requesting ESG data from SMEs and that can support SMEs in monitoring their sustainability performance. While the ED has been built mainly on the basis of questionnaires from business partners, the resulting information is expected to also benefit SMEs by improving their management of sustainability issues and, in this way, contribute to a more sustainable and inclusive economy.

Do you agree with this standard setting objective?

Yes/No/Please explain your answer.

Q2. VSME ED has been structured in three separate modules:
The **Basic Module** is the entry level for SMEs and the target for micro-SME; it is required also in case of use of one of the two other modules.
The **Narrative-Policies, Actions and Targets (PAT) Module** is expected to be used by SMEs that have already in place some formalised policies, actions and targets.
The **Business Partners (BP) Module** is expected to be used when an SME faces data requests from its business counterparties.

The following alternatives for reporting uses are possible under the VSME ED:

1) The Basic Module alone;
2) The Basic Module with the Narrative-PAT Module;
3) The Basic Module with the Business Partners (BP) Module;

4) All three Modules together.

Do you agree that these alternatives are appropriate to deal with the diversified undertakings in scope (both number of employees and economic sectors) in the context of the objective as stated in Q1 of this questionnaire?

Yes/No/Please explain your answer.

Q3. The Basic Module is written in simplified language to make it easily understandable for micro and SME undertakings, while ensuring clarity in terms defined by the ESRS with 12 disclosures to be reported. There is no need for a materiality analysis. Certain disclosures are required only if the undertaking considers them "applicable".
Do you agree that the **Basic Module** is proportionate, understandable (in terms of language), and has a reasonably complete set of disclosures to be used as a starting point?

Yes/No/Please explain your answer.
If answer is NO, please indicate the relevant disclosure.

Q4. The Narrative-Policies, Actions and Targets (PAT) Module is suggested in addition to disclosures in the Basic Module, to undertakings that have formalised and implemented PAT. Materiality analysis is required to determine and disclose the sustainability matters that are relevant for the undertaking.
Do you agree with the content and approach of the **Narrative-PAT Module**, which is reserved to undertakings that have Policies, Actions and Targets (PAT) in place?

Yes/No/Please explain your answer.

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Q5. The Business Partners (BP) Module sets datapoints to be reported in addition to disclosures in the Basic Module, which are likely to be included in data requests from lenders, investors and corporate clients of the undertaking. Materiality analysis is required, in order to determine and disclose the sustainability matters that are relevant for the undertaking.
Do you agree with the content and approach to the **Business Partners (BP) Module,** as a replacement and standardisation of information requests by business partners, being a proportionate but complete set of ESG disclosures?

Yes/No/Please explain your answer.

Q6. FOR USERS and PREPARERS ONLY: Kindly indicate the proportion of ESG questionnaires or other ESG information requests that are used to collect data from SMEs (both for reporting and managerial purposes) that could be replaced if the SMEs provide the information covered by the three modules of the VSME ED.

- **Below 20%; 20-50%; 50% -80%; above 80%**
- **Please explain what items are missing and your rationale.**

Sector guidance

Q7. Sustainability matters may be highly dependent on the specificities of the relevant sector(s) that the reporting undertaking operates in. Please select your recommended course of action for standard setting and guidance purposes on this matter.
[PLEASE SELECT ONE]

1. Undertakings applying VSME ED should apply on a voluntary basis existing reporting practices, without specific EFRAG guidance.
2. Undertakings applying VSME ED should apply on a voluntary basis the content of the future Sector ESRS for large undertakings.
3. Undertakings applying VSME ED should apply on a voluntary basis sector specific guidelines and disclosures designed for non-listed SMEs, to be issued by EFRAG as a non-authoritative annex to the future sector-ESRS.

4. Undertakings applying VSME ED should apply on a voluntary basis sector specific guidelines and disclosures applicable to both listed and non-listed SMEs, to be issued by EFRAG as a non-authoritative annex to the future sector-ESRS.

Please note that your answer will be complemented by question 13 on the additional dimension of reporting including sectors.

Please provide your comments, if any.

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PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

a. Principles for preparation

Please refer to the text of VSME ED in Annex 1.

Q8. Do you agree with the proposed Principles for the preparation of the sustainability report in VSME ED?

Principles for the preparation of the sustainability report (Basic Module, Narrative-PAT Module, Business Partners Module)			
	Agree	**Disagree**	**Comment**
a) Complying with this Standard (paragraphs 9 and 10 in VSME ED)			
b) Preparation on a consolidated basis (paragraph 12 in VSME ED)			
c) Timing and location of the Sustainability Report (paragraphs 13, 14 and 15 in VSME ED)			
d) Classified and sensitive information, and information on intellectual property, know-how or results of innovation (paragraph 16 in VSME ED)			

[PER EACH 'DISAGREE': please explain your reasoning]

Q9. Additional question on Complying with this Standard. Undertakings should indicate which modules or which combination of modules they expect to use. This question aims at better understanding the market acceptance as a fundamental aspect of the standard on the two different sides of users and preparers (please refer to BC5 in Annex 2 *Basis for conclusions for VSME ED*). In this context, how do you anticipate to make use of the modular approach:

[MULTIPLE SELECTION POSSIBLE]

IF PREPARER:	Basic Module	Basic Module + Narrative Module	Basic Module + Business Partners Module	All 3 Modules	Rationale for your answer
Specify which approach(es) you would consider when applying VSME ED					

[MULTIPLE SELECTION ALLOWED]

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IF USER:	Basic Module	Basic Module + Narrative Module	Basic Module + Business Partners Module	All 3 Modules	Rationale for your answer
Specify which approach(es) you deem most appropriate to cover the information needs you require					

Q10. Additional question on Preparation on a consolidated basis. The VSME ED recommends the undertakings that are parent of small and medium sized groups to prepare consolidated reports for their sustainability statement, i.e. to include data of their subsidiary/ies in the report. Do you agree with this approach?

Yes/No/Please explain your answer.

Q11. Since non listed SMEs are outside the scope of CSRD, the subsidiary exemption (see CSRD Art. 19a9) does not apply to them. One proposal that EFRAG could consider is to include such exemption in VSME ED, as a further incentive to apply consolidated sustainability reporting. Would you consider the inclusion of a subsidiary exemption to VSME ED as pertinent and feasible?

Yes/No/Please explain your answer.

Q12. Additional information component including sectors (VSME ED par. 11, applicable to all the modules)

Depending on the type of activities carried out, the inclusion of additional information about issues that are common to the undertaking's sector supports the provision of relevant, faithful, comparable, understandable and verifiable information. While acknowledging the difficulties that this requirement may raise for SMEs, the inclusion of this additional dimension was considered an important element of VSME ED to fulfil in particular-sector specific disclosures. Do you agree with this approach?

Yes/No/Please explain your answer.

b. Basic Module

Q13. The Basic Module is the entry level for non-listed SMEs and has a highly simplified language. Ideally the undertaking should be able to produce these disclosures with limited help of consultants. It comprises 12 disclosures which have been mapped with existing voluntary initiatives (i.e. Nordic Sustainability reporting standards for SMEs, German Sustainability Code, CDP guide for SMEs etc.). These disclosures have been identified as recurring in the questionnaires analysed by the EFRAG Secretariat (please refer to Annex 2 *Basis for conclusions for VSME ED* for more details).

With reference to the proposed disclosure requirements, please include your answer in the table below:

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VSME ED	**IF PREPARER:** **Feasible / Difficult to prepare /Already disclosed under other reporting schemes or regulations (i.e. EMAS)** **If answer is Difficult to prepare: Please explain the challenge and what would help you to prepare this disclosure.** **Optional Comments.**	**IF USER:** **This disclosure is essential/Not necessary** **Optional Comments.**	**IF OTHER RESPONDENT: Do you have comments on the inclusion and content of this disclosure?**
Disclosure B 1 – Basis for Preparation			
Disclosure B 2 – Practices for transitioning towards a more sustainable economy			
B 3 – Energy and greenhouse gas emissions			
B 4 – Pollution of air, water and soil			
B 5 – Biodiversity			
B 6 – Water			
B 7 – Resource use, circular economy, and waste management			
B 8 – Workforce – General characteristics			
B 9 – Workforce - Health and Safety			

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VSME ED	IF PREPARER: Feasible / Difficult to prepare /Already disclosed under other reporting schemes or regulations (i.e. EMAS) If answer is Difficult to prepare: Please explain the challenge and what would help you to prepare this disclosure. Optional Comments.	IF USER: This disclosure is essential/Not necessary Optional Comments.	IF OTHER RESPONDENT: Do you have comments on the inclusion and content of this disclosure?
B 10 – Workforce – Remuneration, collective bargaining, and training			
B 11[23] – Workers in the value chain, affected communities, consumers and end-users			
B 12 – Convictions and fines for corruption and bribery			

Q14. FOR USERS ONLY: Is there any datapoint(s) missing from this module that you consider as essential to meet your information needs?

Yes/No.

If Yes, please specify the datapoint(s) and provide a rationale for your answer.

Q15. B3 to B7 require disclosure of environmental performance metrics. There are other schemes used by SMEs requiring reporting of similar metrics, such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009). Do you see any potential for better alignment with those other reporting schemes?

Yes/No/Please explain your answer.

[23] This datapoint was not identified in any of the questionnaires analysed by EFRAG Secretariat but was inserted to keep consensus based on the recommendation by some EFRAG SRB members.

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Q16. The guidance provided for B9 on the number of fatalities as a result of work-related injuries and work-related ill health refers to incidents arising during travel and, outside of the undertaking's responsibility (e.g. regular commuting to and from work). These incidents are subject to the applicable national legislation that regulates their categorisation as to whether these are work-related or not. Is the practice in your country to include such incidents as work-related fatalities?

Yes/No/ Please explain your answer including references to the relevant legislation.

Q17. B10 (a) requires undertakings to disclose the relevant ratio of the entry level wage to the minimum wage, when a significant proportion of employees are compensated based on wages subject to minimum wage rules. This datapoint deviates from the disclosure requirement on adequate wages established in ESRS S1-10 – Adequate wages (from paragraphs 67 to 71) as a simplification (i.e., easier to collect). Do you consider that this requirement will provide relevant and comparable information?

Yes/No/Please explain your answer.

Q18. B11 was drafted to cover, in a simplified way, a description of the process to identify material impacts and a description of those for workers in the value chain, affected communities and consumers/end-users. This disclosure is an exception to the general approach in the Basic Module where materiality does not apply. **As a compromise, it was included as a voluntary disclosure.** Do you agree with this approach?

Yes/No/Please explain your answer.

Q19. In order to help SMEs prepare the sustainability report, specific guidance has been developed for the Basic Module in paragraphs 87 to 167 of VSME ED. Do you think that it is useful for the preparation of the report? Do you think it is sufficient?

Yes/No/Please explain your answer or add suggestions.

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c. Approach to materiality of matters and Principles for preparation (common to Narrative-PAT and Business Partners Modules)

Q20. Do you think that the language and approach to the Principles of Materiality to be applied to the Narrative-PAT Module and Business Partners (BP) Module are proportionate for the undertakings in scope? Please include your feedback in the table below:

VSME ED	**Agree/ Disagree**	**Comment**
Impact materiality (paragraphs 46-50 in VSME ED)		
Financial materiality (paragraphs 51-55 in VSME ED)		
Stakeholders and their relevance to the materiality analysis process (paragraphs 56 and 57 in VSME ED)		

Q21. The VSME ED requires to perform materiality analysis in order to disclose which of the sustainability matters listed in Annex B of VSME ED (which is the same as AR 16 of ESRS 1 *General requirements*) are material to the undertaking. Therefore, users will understand for which material matters the undertaking does not have Policies Actions and Targets (PAT) in place. This approach (like for ESRS Set 1) is designed to have a reliable depiction of what the undertaking is doing to address sustainability matters, avoiding greenwashing. At the same time, this approach only requires reporting the PAT (Policies,

Actions and Targets) that the undertaking has in place. No information is required when they have no PAT in place for a material matter (in addition to the list of material matters itself).

In the VSME ED, the Narrative-PAT and Business Partners Modules require assessing the materiality of the matters, as it considers the disclosure of only material matters as essential information for users. **Do you agree with this approach?**

a) **For all respondents: Yes/No/Please explain your answer.**
b) **For users only:** Is the list of material matters essential for you? **Yes/No/Please explain your answer.**

Q22. As a way to simplify the materiality approach, whenever possible the notion of "report only if applicable" has been introduced. This filters information to be reported by undertakings on the basis of relevance. No disclosure is expected for a specific datapoint, when the undertaking's circumstances are different from those that would trigger disclosure of that specific datapoint, as described by the relevant provision in VSME ED. This is particularly important for the Basic Module, where no materiality analysis is foreseen and all the disclosures are to be reported, if applicable. Disclosures in the Business Partners module are to be reported are to be reported if they are applicable and for BP 5,7, 8, 9, 10 (for which the "if applicable" approach would not work) if they are relevant to the undertaking's business and organisation.

Do you agree with this approach?

Yes/No/Please explain your answer.

Q23. Financial opportunities have been included only on an optional basis in VSME ED since the CSRD focused on negative impact when addressing SMEs. Do you agree?

a) **Yes, reporting for financial opportunities should be optional**
b) **No, reporting for financial opportunities is not needed for non-listed SMEs (focus on negative impacts only).**

Please explain your answer.

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Q24. Do you agree with the proposed principles for the preparation of the sustainability report for the Narrative-PAT and Business Partners Module in VSME ED? Please include your feedback in the table below:

Principles for the preparation of the sustainability report (Narrative-PAT Module, Business Partners Module)			
	Agree	**Disagree**	**Comment**
a) Time horizons (paragraph 40 in VSME ED)			
b) Coherence and linkages with disclosures in financial statements ((paragraph 41 in VSME ED)			

[PER EACH 'DISAGREE': please explain your reasoning]

Please add your comments, if any.

d. Narrative-Policies, Actions and Targets (PAT) Module

Q25. Do you agree with the content of the disclosures required by the Narrative-PAT Module of VSME ED? Please refer to Annex 2 Basis for conclusions for VSME ED for further detail. Please include your feedback in the table below:

VSME ED	**USER = This disclosure is essential/Not necessary** **PREPARER= Feasible/ Difficult to prepare/ Already disclosed under other reporting schemes or regulations**	**OTHER RESPONDENTS: Do you have comments on this disclosure?**
Disclosure N 1 – Strategy: business model and sustainability related initiatives		
Disclosure N 2 – Material sustainability matters		
Disclosure N 3 – Management of material sustainability matters		
Disclosure N 4 – Key stakeholders		
Disclosure N 5 – Governance: responsibilities in relation to sustainability matters		

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Q26. FOR PREPARERS ONLY: If you anticipate that you will apply the Narrative-PAT module, have you implemented policies, actions and targets (PAT) and/or climate transition plans due to requests of counterparties in the value chain?

Yes /No/Please explain.

Q27. FOR USERS ONLY: Are there any datapoint(s) missing from this module that you consider as essential to meet your information needs?

Yes/No/Please specify the datapoint(s) and provide a rationale for your answer.

Q28. N3 requires the disclosure of policies, actions and targets to manage material sustainability matters. There are other schemes used by SMEs requiring reporting of similar information, such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009) regarding environmental policies, actions and targets. Do you see any potential for better alignment with those other reporting schemes?

Yes/No/Please explain your answer.

e. Business Partners (BP) Module

Q29. While acknowledging the complexities of this calculation specifically for SMEs, the inclusion of greenhouse gas (GHG) Scope 3 emissions as the entity-specific dimension was considered an important

element of disclosure in some sectors. The Business Partners Module includes an entity specific consideration for GHG Scope 3 emissions to guide undertakings in certain sectors and for which Scope 3 GHG emissions are material in addition to the disclosures envisaged in B3 Energy and GHG emissions (Basic Module). Do you agree with the inclusion of GHG Scope 3 emissions **in the Business Partner Module in the paragraph** "*Entity specific consideration when reporting on GHG emissions under B3 (Basic Module*)"?

Yes/No/Please explain your answer.

FOR PREPARERS ONLY: Is this disclosure feasible? **Yes/No/Please explain your answer.**

Q30. Do you agree with the content of disclosures required by the Business Partners (BP) Module of VSME ED? Please note that you can find the background for each Disclosure in the Annex 2 *Basis for conclusions for VSME ED* (BC130. to BC149). Please include your feedback in the table below:

VSME ED	**IF PREPARER: Feasible/Difficult to prepare/ Already prepared for other purposes**	**IF USER: This disclosure is essential/Not Necessary**	**IF USER: If present in questionnaires, specify to which category of SME (micro, small, medium) the question is asked**	**IF USER: If present in questionnaires, is this asked only for certain sectors? If yes, which ones?**	**Comment (FOR ALL CATEGORIES OF RESPONDENTS)**
Disclosure BP 1 – Revenues from certain sectors					
Disclosure BP 2 – Gender diversity ratio in governance body					
Disclosure BP 3 – GHG emissions reduction target					
Disclosure BP 4 – Transition plan for climate change mitigation					
Disclosure BP 5 – Physical Risks from					

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VSME ED	IF PREPARER: Feasible/Difficult to prepare/ Already prepared for other purposes	IF USER: This disclosure is essential/Not Necessary	IF USER: If present in questionnaires, specify to which category of SME (micro, small, medium) the question is asked	IF USER: If present in questionnaires, is this asked only for certain sectors? If yes, which ones?	Comment (FOR ALL CATEGORIES OF RESPONDENTS)
climate change					
Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio					
Disclosure BP 7 – Alignment with internationally recognized instruments					
Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations					
Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO					

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VSME ED	IF PREPARER: Feasible/Difficult to prepare/ Already prepared for other purposes	IF USER: This disclosure is essential/Not Necessary	IF USER: If present in questionnaires, specify to which category of SME (micro, small, medium) the question is asked	IF USER: If present in questionnaires, is this asked only for certain sectors? If yes, which ones?	Comment (FOR ALL CATEGORIES OF RESPONDENTS)
Declaration and the International Bill of Human Rights)					
Disclosure BP 10 – Work-life balance					
Disclosure BP 11 – Number of apprentices					

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Q31. FOR USERS ONLY: Disclosures in this module are reported if applicable, with the exception of BP 5, 7, 8, 9, 10 that are omitted when considered not material. Do you agree with this approach?

Yes/No/Please explain your answer.

Q32. With reference to **disclosures BP 7, BP 8 and BP 9**, the objective of these three disclosures is to assess the SME's commitment to respecting human rights. The ED has used the terms in the Sustainable Finance Disclosures Regulation (SFDR), applicable to the financial market participants (for example banks), for consistency purposes. Are there alternative disclosures covering the same objective regarding the human rights of own workforce and that are more suitable than these disclosures?

Yes/No/Please explain your answer including updated/proposed text.

Q33. Do you think that it would be beneficial to split the Business Partners (BP) Module into sub-modules depending on the nature of the user (for example “banks”, “investors”, “large corporates”)?

Yes/No/Please explain your answer.

Q34. Some of the questionnaires of banks and other business partners analysed by EFRAG Secretariat included also datapoints related to the EU-taxonomy regulation, despite non-listed SMEs being out of scope. EFRAG considered that preparing this information would be too complex for non-listed SMEs. We note that the EU Platform for Sustainable Finance may in the future make a proportionate tool for EU-taxonomy available. In particular, to meet the technical criteria for inclusion in the climate mitigation taxonomy, large undertakings have to consider the greenhouse gas (GHG) emissions of their various economic activities. These undertakings will need data from their suppliers. Small and medium-sized enterprises (SMEs) playing a crucial role in these undertakings’ supply chains may be asked to provide the following information voluntarily to streamline the process for themselves and their clients:

- SMEs whose activities fall under enabling activities of the Climate Delegated Act, e.g., categories 3.6 (Manufacture of renewable energy technologies) or 9.1 (Market research, development and innovation), should disclose the emission savings of their technology compared to the best-performing alternative.

Do you think that VSME ED should include this additional datapoint to cover EU-Taxonomy disclosures?

Yes/No/Please explain your answer.

Q35. In order to help SMEs prepare their sustainability report, specific guidance has been developed for the Business Partners Module in paragraphs 169 to 193 of VSME ED. Do you think that it is useful in the preparation of the sustainability report? Do you think it is sufficient?

Yes/No/Please explain your answer.

Q36. FOR USERS ONLY: Are there any datapoint(s) missing from this module that you consider as essential to meet your information needs?

Yes/No/Please specify the datapoint(s) and provide a rationale for your answer.

Q37. FOR USERS ONLY: Appendix C of VSME ED reflects the SFDR, Benchmark, Pillar 3 datapoints in VSME ED. This is to support particularly banks and investor to compare the data between SMEs and larger clients and to allow for aggregation. Is Appendix C clear?

Yes/No/Please explain your answer.

Q38. FOR USERS ONLY: Do you think that the ability of VSME ED to replace the existing ESG questionnaires or other ESG information requests can be further increased, if some datapoints were added to VSME ED?

Yes/No.

IF YES: please explain your answer.

IF NO: Why do you think that the ability of VSME ED to replace the questionnaires cannot be increased?

[select one or more]

- Sector-specific data is not suitable for a sector-agnostic VSME ED
- Data demands that are specific to your relationship with the SME and cannot be standardized
    - In this case: please explain your reasoning.
- Other reasons
    - In this case: please explain.

Q39. Please provide any further comments not addressed in part 1 or 2 of the questionnaire here:

[Comment box]

Q40. If you want to provide additional comments in a document on aspects not covered in the questionnaire, please upload your file here.

[Browse document]

PART 3: Value chain cap (Separate section on the value chain cap as determined by the ESRS LSME)

Non-listed SMEs receive data requests from large undertakings, including due to reporting obligations in the CSRD.

Jointly with the consultation on VSME ED to the consultation on this voluntary standard for non-listed SMEs, EFRAG is also consulting on the content of ESRS for listed SMEs (ESRS LSME ED). While ESRS cannot result in large undertakings having to request disclosures that are not included in ESRS LSME ED (which sets the value chain cap from a legal perspective), the VSME ED is intended to play a key role in

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supporting SMEs, when they prepare the information needed by large undertakings for ESRS reporting, as well as for other obligations including for business purposes. Therefore, VSME ED includes simplified disclosures that generally correspond to the reasonable expectations of ESRS Set 1 preparers (i.e. large undertakings that prepare their sustainability statement under ESRS). As a consequence, non-listed SMEs that apply VSME ED will in general be able to meet the data requests defined for value chain in ESRS LSME ED, except for very specific cases. These cases correspond to disclosures which are included in ESRS LSME ED (therefore SMEs may receive data requests from large undertakings relating to these disclosures, either due to their ESRS reporting obligations or for other obligations and business purposes), but are not included in the VSME ED, due to their excessive complexity for non-listed SMEs in general. They are principally of a sectorial nature (GHG Removals, substances of concern/high concern, resource inflows), mainly needed for management or specific arrangement purposes. More information is provided on these disclosures in Annex 3 [link].

Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.

Q41. Do you agree with the approach taken by EFRAG on the Value Chain Cap?

Yes/No.

If Yes: Please explain your answer.

IF No: Are you willing to provide detailed feedback based on Annex 3?

- **If No**: please explain your answer in brief.
- **If Yes**: Select the areas of disclosure (from the table below) for which you disagree with EFRAG conclusion (For further details please refer to Annex 3 [link])

AREA OF DISCLOSURE	DISAGREE [ALLOW MULTIPLE SELECTION]	IF DISAGREE: EXPLAIN WHY REFERRING SPECIFICALLY TO CONTENT OF ANNEX 3
1. SBM-1,SBM-3, IRO-1: for both LSME and VSME EDs the conclusion is that no undue effect expected from ESRS reporting		
2. Policies, Actions and Targets (PAT): for both LSME and VSME EDs the conclusion is that no undue effect expected from ESRS reporting		
3. Climate Transition plan (Section 3 Actions – AR 6 and AR11): for both LSME and VSME EDs the conclusion is that no undue effect expected from ESRS reporting		
4. GHG emissions (E1-2 GHG emissions – Scope 3): for both LSME and VSME EDs the conclusion is that no undue effect expected from ESRS reporting		
5. GHG removal (E1-3 GHG removals): No undue effect on LSMEs expected from ESRS reporting. Additional information (not for ESRS reporting but for the implementation of possible specific arrangements) may be needed beyond VSME but is too specific to be covered by VSME ED.		
6. Substances of concern and substances of very high concern (E2-2 Substances of concern and substances of very high concern): No undue effect on LSMEs expected		

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AREA OF DISCLOSURE	DISAGREE [ALLOW MULTIPLE SELECTION]	IF DISAGREE: EXPLAIN WHY REFERRING SPECIFICALLY TO CONTENT OF ANNEX 3
from ESRS reporting. Additional information (not for ESRS reporting but for the implementation of possible specific arrangements) may be needed beyond VSME but is too specific to be covered by VSME ED.		
7. Resource inflows (E5-1 Resource inflows): for both LSME and VSME EDs the conclusion is that no undue effect expected from ESRS reporting		
8. Entity specific disclosures: For both EDs: Perspective 1: Possible trickle-down effect under specific arrangements to allow Set 1 preparers to cover material sector and/or to disclose entity-specific information including value chain. Perspective 2: not applicable, as the datapoint cannot be defined (due to entity-specific nature of the disclosure).		

Q42. Do you have any other comment on value chain?

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Annex 15: Public Consultation Field Test Questionnaire

VSME ED - EFRAG Field Test

Purpose and content of the field test

EFRAG is consulting on its Exposure Draft for a voluntary sustainability reporting standard for non-listed SMEs (including micro undertakings) (VSME ED). A questionnaire has been prepared to support the collection of public feedback in the consultation and can be found [here].

This field test is conducted in parallel with the public consultation and intends to complement the outcome of the consultation, with additional fact-based evidence. The purpose is to gather facts and evidence on the challenges and benefits of the content of the ED, from stakeholders that will prepare actual disclosures applying VSME ED. **From the preparers' perspective,** the participation to the field test may take two forms: Actual preparation of (or part of) the disclosures in VSME ED, respond to the Field Test Questionnaire and participation to workshops and/or interviews with EFRAG Secretariat; or

(a) Preparation (such as assessment of the challenges and benefits deriving from the disclosures in VSME, supported by the Field Test Questionnaire) and participation to workshops and/or interviews with EFRAG Secretariat.

While the second approach is less strenuous, EFRAG encourages preparers to follow the first approach as far as possible as it will provide significantly more useful information.

From the users' perspective, the participation to the field test require preparation and participation to workshops and/or interviews with EFRAG Secretariat.

The Field Test focuses on the following key elements:

(a) The costs and challenges associated with each of the disclosures;

(b) The understandability of the guidance provided in the ED and its ability to support the implementation of the disclosure requirements; and

(c) The expected benefits of the disclosures.

Practical considerations

A preparer may elect to test one or more of the following modules:

- Basic Module
- Narrative-PAT Module
- Business Partners Module.

The application of the *General Principles for the preparation of the sustainability report* is considered as part of each module.

A prerequisite to participation in the field test is the completion of the consultation questionnaire as well as the field test questionnaire. This means that all the questions in the consultation questionnaire related to the selected module(s) need to be answered and may be further discussed in the workshops/interviews.

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Mocked- up sections of sustainability statement would be very welcome but are not required (approach a) versus b) on the previous page).

All information provided will be treated confidentially and it may be shared with the consultant assisting with the Cost Benefit Analysis. The results of the Field Test will be published on an anonymised basis.

After analysis of the responses, the results will be discussed at workshops jointly with other preparers and users that participate to the field test discussion to validate the outcomes from the field test, as well as to ensure a full understanding of responses. The workshops are planned for the first half of May 2024. The results from the test will then be presented to the EFRAG SRB and EFRAG SR TEG and considered as part of the consultation material.

EFRAG is looking for participants that allow for a balanced coverage of:

- countries in the European Economic Area, sectors, size;
- preparers with experience in voluntary reporting sustainability matters and/or communicating through sustainability related questionnaires with counterparties information related to sustainability matters;
- from the users' side: Business partners and other counterparties (including lenders, investors) of non-listed SMEs.

For further information, please contact VSME@efrag.org.

Please complete the selected modules for this questionnaire and the corresponding questions in the consultation questionnaire by **21 April 2024**.

Please note that answers will be considered only if you press the Submit button. After completing the questionnaire, you will receive a confirmation email.

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Field Test Questionnaire

1) Please indicate whether you want to be contacted for any follow-up questions*:

( ) Yes, I want to be contacted.

( ) No, I do not want to be contacted.

2) Please indicate which module(s) you will respond to in this questionnaire*:

( ) Basic Module (if applied in part, please specify)

( ) Basic and PAT Module (if applied in part, please specify)

( ) Basic and Business Partners Module (if applied in part, please specify)

( ) All three

EFRAG encourages to provide input on all the disclosures in a module once chosen, as this is more useful for the analysis.

3) Please indicate if for the purposes of this field test you prepared the disclosures in the selected module(s)*

( ) YES – we will provide our feedback based on the preparation of the disclosures in the selected modules (delivery of the actual disclosures/mock-up of it is optional)

( ) NO – we will not prepare the disclosures in the selected modules, but we will run preparatory analysis and report during the workshop/interview.

* Denotes that the information has to be provided.

Part 1 – Preparation of Basic Module

1) **IF PREPARER:** When considering the disclosures covered by the Basic Module of VSME ED, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

( ) Availability of data with appropriate quality

( ) Availability of IT or supporting tool

( ) Availability of skills and resources

( ) Complexity in language

( ) Complexity in requirements

( ) Others (specify)

Comments – (please also indicate if this is more pertinent to some disclosures or specific metrics and datapoints)

_____

_____

_____

_____

_____

2)

IF PREPARER. With reference to Metric B 3 to B12 of Basic Module, please state per each disclosure the level of difficulty encountered and why.	Low	Medium	High

3) IF PREPARER: With reference to the Basic Module, please state the estimated total cost (in euros) to prepare it, with a breakdown as follows:

a. HR/Personnel costs

b. Consultancy costs

c. IT costs (e.g. software, online platforms)

d. Other (specify)

Please distinguish your estimates between first year of preparation and recurring costs.

_____

_____

_____

4)

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IF USER. With reference to Metric B 3 to B12 of Basic Module, please state the level of relevance and related benefit for information need and why	Low	Medium	High

5) With reference to Metric B 3 to B12 of Basic Module, estimate the benefits in quantitative and/or qualitative terms that the application of this Module would imply with the following breakdown:

a. synergies with other questionnaires (simplification and cost savings) (Value/Text)

b. increased access to finance (Value/Text)

c. access to more clients and better market positioning/competitiveness (Value/Text)

d. awareness and monitoring of sustainability issues (Value/Text)

e. other, please explain your answer. (Value/Text)

Comments – (please also indicate if this is more pertinent to some disclosures or specific metrics and datapoints)

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Part 2 – Principles of Materiality applicable in Narrative-PAT and Business Partners (BP) Module

1) **IF PREPARER:** These modules require performing a double materiality analysis (i.e. both financial and impact) in order to identify and disclose the list of sustainability matters that are relevant to the undertaking (i.e. those that expose the company to impacts on people/environment and/or to financial risks). In this context, does impact and financial materiality assessment, stakeholders' identification and engagement support the identification of the relevant matters at a reasonable cost/benefit balance? What specific challenges did you encounter? Please explain.

Part 3 – Preparation of Narrative-PAT Module

1) **IF PREPARER:** When considering the disclosures covered by the Narrative-PAT Module of VSME ED, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

( ) Availability of data with appropriate quality

( ) Availability of IT or supporting tool

( ) Availability of skills and resources

( ) Complexity in language

( ) Complexity in requirements

( ) Others (specify)

Comments – (please also indicate if this is more pertinent to some disclosures or specific data points)

2)

IF PREPARER: With reference to disclosures N 1 to N 5 of Narrative-PAT Module, please state per each disclosure the level of difficulty encountered and why.	Low	Medium	High

3) IF PREPARER: With reference to the Narrative-PAT Module, please state the estimated total cost (in euros) to prepare it, with a breakdown as follows:

a. HR/Personnel costs
b. Consultancy costs
c. IT costs (e.g. software, online platforms)
d. Other (specify)

Please distinguish your estimates between first year of preparation and recurring costs.

4)

IF USER: With reference to disclosures N 1 to N 5 of Narrative-PAT Module, please state the level of relevance and related benefit for information need and why.	Low	Medium	High

5) With reference to disclosures N 1 to N 5 of Narrative-PAT Module, estimate the benefits in quantitative and/or qualitative terms that the application of this Module would imply with the following breakdown:

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a. synergies with other questionnaires (simplification and cost savings) (Value/Text)
b. increased access to finance (Value/Text)
c. access to more clients and better market positioning/competitiveness (Value/Text)
d. awareness and monitoring of sustainability issues (Value/Text)
e. other, please explain your answer. (Value/Text)

Comments – (please also indicate if this is more pertinent to some disclosures or specific metrics and datapoints)

Part 4 – Preparation of the Business Partners Module

1) **IF PREPARER:** When considering the disclosures covered by the Business Partners Module of VSME ED, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

( ) Availability of data with appropriate quality

( ) Availability of IT or supporting tool

( ) Availability of skills and resources

( ) Complexity in language

( ) Complexity in requirements

( ) Others (specify)

Comments – (please also indicate if this is more pertinent to some disclosures or specific metrics and datapoints)

2)

IF PREPARER. With reference to disclosures BP 1 to BP 11 of Business Partners Module, please state per each disclosure the level of difficulty encountered and why.	Low	Medium	High

3) IF PREPARER: With reference to the Business Partners Module, please state the estimated total cost (in

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euros) to prepare it, with a breakdown as follows:

a. HR/Personnel costs
b. Consultancy costs
c. IT costs (e.g. software, online platforms)
d. Other (specify)

Please distinguish your estimates between first year of preparation and recurring costs.

4)

IF USER. With reference to disclosures BP 1 to BP 11 of Business Partners Module, please state the level of relevance and related benefit for information need and why.	Low	Medium	High

5) With reference to BP 1 to BP 11 of the Business Partners Module, estimate the benefits in quantitative and/or qualitative terms that the application of this Module would imply with the following breakdown:

a. synergies with other questionnaires (simplification and cost savings) (Value/Text)
b. increased access to finance (Value/Text)
c. access to more clients and better market positioning/competitiveness (Value/Text)
d. awareness and monitoring of sustainability issues (Value/Text)
e. other, please explain your answer. (Value/Text)

Comments – (please also indicate if this is more pertinent to some disclosures or specific metrics and datapoints)

Additional input

If you have any additional input you would like to provide (including mock up of disclosures) please upload the relevant files.

[Attach file here]

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Annex 16: Summary of post-consultation workshops with banking and SME associations

This annex contains the summary of the workshops held with banking associations on 16 September 2024 and with SME associations on 23 September 2024.

Summary of the VSME Banking Post-Consultation Workshop 16 September 2024

General observations:

1. Support the proposed architecture from 3 banking associations. They find that the two modules (Basic Module and Comprehensive Module) are the most important.

Feedback on Principles

Inclusion of subsidiaries in the reported data:

2. All banking associations support the inclusion of paragraph 13. Two national banking associations suggest adding the following specification as a footnote: “If a subsidiary in the perimeter of the consolidated report is a direct borrower of a bank, the bank may require on a bilateral basis specific information from the subsidiary (i.e. under the VSME).”

Timing and location of sustainability report

3. All banking associations agree with the fact that SMEs have to report on an annual basis mentioning that for those disclosure that did not change from the previous year, SMEs can refer to the information provided for the previous year. In addition, one national banking association suggests that it must be clear that in the case the report is not updated, it must` be clear that information has not changed.

Classified and sensitive information and information on intellectual property, know-how or results of innovation

4. Agreement to delete points a + b of paragraph 17 and introduce in paragraph 23 a specification of whether the company adheres to all requirements of the Modules or whether it omits certain information because it is deemed confidential (explicitly). One national banking association suggested also specify within this disclosure the datapoints that are not applicable for the undertaking. On this last point, EFRAG Secretariat explained that such explanation is already present in the standard in paragraph 20.

Feedback on Basic Module

B1 – Basis for preparation:

1. All banking associations agree to delete the NACE code column in the table in the guidance under paragraph 79. NACE Sector/s classification codes as requested under paragraph 23 (d) (iv) for the undertaking not per site
2. Discussion concerning the term “site” or “local unit”. Ultimately, banking associations agreed that the word “site” is preferred.
3. In addition, banking associations suggest to include “all sites” (not only strategic ones). Suggestion by two national banking associations to add “turnover by site” for those sites that add up to 80% of total turnover (for example 4 sites that generate 20% of turnover each) to replace the notion of “strategic sites”. Not supported by other banking associations that considered this proposal and the notion of “Strategic sites” too difficult.
4. On geolocation, two banking associations suggested including also the altitude as a third coordinate.

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B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy:

5. All banking associations agreed with the template in the guidance (they found it very user friendly) and with the new disclosure.

B 3 – Energy and greenhouse gas emissions

6. All banking associations agreed that GHG intensity has to be asked under this disclosure. They all agreed with the formulation proposed in paragraph 33 by EFRAG Secretariat.
7. All banking associations agreed that building energy certificates (paragraph 32) should be deleted on the basis that it is only needed for those buildings used as collateral for a loan that are usually requested bilaterally as part of the mortgage files.
8. All banking associations agree with the table proposed under paragraph 30. However, one national banking association suggested to specify in the guidance/make more explicit in the table of par. 30 what renewable fuels are exactly covered (geothermal, biofuels...).

B6 - Water

9. All bank association representatives who participate in this discussion stated that the metric on water intensity is not needed and thus could be deleted.

B8 – Workforce General Characteristics

10. Concerning non-employees (paragraph 45), the majority of banking associations (except one national banking association) agreed that paragraph 45 can be deleted. However, EFRAG Secretariat could introduce in the basis for conclusions the fact that information concerning non-employees could be asked bilaterally at a national level.
11. Concerning staff turnover (paragraph 44), majority banking associations (except two national banking associations) support keeping it.

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<u>Feedback on Comprehensive Module</u>

C2 – Gender diversity ratio in governance body

12. All banking association representatives agreed to keep C2 as needed. Only one national association stated that it did not need it. To better clarify that if the SME does not have a governance body in place, it does not have to report this disclosure.

C 3 – GHG reduction and climate transition

13. All banking associations agree with this disclosure. One national banking association (one national banking association) suggests specifying the scope of the target under paragraph 60.

C4 – Physical risks from climate change

14. On paragraph 63 point (c), a national bank association representative stated that it would be better to ask “whether it has undertaken or is planning to undertake climate change adaptation actions”.
15. One banking association viewed points (a + b) of paragraph 63 to be too complicated for SMEs and mentioned that these points could be covered by geolocation plus percentage of turnover or employees of each single site in B1. EFRAG secretariat reminded that the VSME should raise awareness in managing environmental risks (among others) and by providing only geolocation SMEs would remain passive in assessing those risks (SR TEG discussions in July).
16. On paragraph 64 (insurance coverage). All banking representatives agreed to compromise to ask as a YES/NO question whether or not insurance coverage exists; if needed banks can ask for the insurance contracts and further details on maturity bilaterally.

C5 – Human rights impacts and complaints and C6 – Incidents related to severe human rights cases

17. Agreement from banking representatives with the drop-down menus proposed under these two disclosures.
18. One national banking association stated that the SMEs should have the possibility to complement the drop-down menu responses with a narrative option.
19. Additionally, one European banking association asked to increase clarity on the word "confirmed cases" in C6 (paragraph 67).

Feedback on Additional Financial Institutions (AFI) MODULE

AFI 1 – Energy Production

20. All banking associations agreed that this disclosure is not necessary but a nice to have, thus they supported the deletion.

AFI 2 – Vehicle Fleet

21. All banking representatives agreed that this disclosure is not needed. They supported the deletion.

AFI 4 – Workforce (General) Additional characteristics

22. Agreement by all banking associations to delete the disclosure on disabilities (paragraph 73). Suggestion to add in basis for conclusions a sentence explaining that such disclosure could be requested bilaterally at a national level.
23. Concerning the female to male ratio at management level, agreement to keep it. However, this could be moved to Basic (B8) or in Comprehensive Module.

AFI 5 – Exclusion from EU reference benchmarks

24. Agreement by all banking associations that this disclosure is needed and could be moved to the Comprehensive Module after C1 – Revenues from certain sectors.

AFI 6 - Placeholder on future streamlined alignment with EU Taxonomy eligible activities

25. EFRAG Secretariat clarified that this disclosure is a placeholder as a simplified taxonomy is being developed by the Platform of Sustainable Finance.
26. One national banking association suggested to correct the title and include "Taxonomy aligned activities" as only "eligible" is not that useful for banks. EFRAG Secretariat will amend the title.

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Summary of the SME Post-Consultation Workshop 23 September 2024

Feedback on cross-cutting disclosures

1. SME representatives welcomed the changes and the revised architecture. However, SME representatives stated the overall guidance remains slightly complicated. Additionally, it was asked how the tables from the guidance would be integrated in the VSME, whether they would stay in the guidance or whether they would be placed within the disclosures or how it would work as a digitalized tool.
    a. SR TEG Chair answered that there have been no official conclusions taken with regards how the digital tool will evolve and who will be in charge of running it. Additionally, EFRAG may work, compatibly with the available resources, on a number of IGs for SMEs that are identified as part of the consultation. There is a possibility that national governments will run individual platforms and that EFRAG might be a facilitator, however, it could also be that the platform will be a central European one. EFRAG may be involved in transforming these online tools templates into XBRL. EFRAG will not develop the online platform per se, but will have this facilitator role, then we will provide online templates and IGs.
    b. An SME representative asked to clarify why EFRAG did not follow through the sub-module proposal. The member also asked whether in the digital tool, it could be stated that the undertaking is reporting for a large undertaking or an investor (banks), to then ask different questions, depending on the user needs.
    c. A European SME representative stated that very fruitful meetings have been held with EFRAG Secretariat, stating that principles were taken on board. Additionally, this representative mentioned that paragraph 23 (c) (**B1** – Basis for preparation) still needs clarification/ additional guidance to better define “consumers”.
    d. SME representatives stated that NACE codes are complicated for SMEs in certain sectors.
    e. Additionally, the integration of former N3 and N5 (from the Narrative-PAT module) into **B2** (Practices, policies and future initiatives for transitioning towards a more sustainable economy) was appreciated and welcomed by SME representatives and the associations present in the meeting. The table in the guidance has been especially appreciated.

Feedback on metrics B3- Energy and greenhouse gas emissions:

2. SME representative reiterated the difficulty for SMEs to know their electricity mix as providers not always give this information, he asked to reinsert information related to electricity “as reflected in utility bills” or add the word estimated (of renewable/ non -renewable mix).

B5 - Biodiversity:

3. Confirmation that paragraph 36 will be deleted (as no datapoints are asked from this paragraph).

B6 - Water:

4. Confirmation to SME representatives that water intensity will be removed as indicated by banks workshop.

B7 - Resource use, circular economy and waste management:

5. For paragraph 42(b) – (waste diverted to recycling or reuse), the issue for the construction sector was reiterated from the SR TEG discussion held on 19 September.
6. SME representatives agreed with the possibility of integrating a “not known” clause for this paragraph. They stated that it would be good to find a way in which the SME can provide the data without additional preparatory costs, but this may be difficult to implement/ force disposal contractors to disclose, thus making this “not known” clause more feasible than other alternatives the SME representatives could think of.

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7. With regards to the word “re-use” (paragraph 42(b)), SME representatives stated that there lacked clarity on what reuse meant.
8. Another SME representatives expressed that other Circular Economy (CE) principles, other than “recycling” and “reuse”, are not very well addressed in this disclosure. Other CE principles such as “repair”, “refurbish” etc. should be included/ covered by the standard to address specific sector needs such as for the textile and dry-cleaning sectors that focus on circularity-based services.
9. On this point, an SME representative highlighted the importance of differentiating between whether the end of the first cycle of a given material induces a cost to an SME (when this material is sent off for recycling and the SME has to pay for its recycling) or when at the end of the first cycle, the SME is able to reuse the material and make money from it again (not a net cost).
10. This SME representative highlighted how in Germany it is differentiated between waste that brings costs to an undertaking and waste that is reused by the undertaking and is therefore a source of money.
11. On this point, an SME representative also highlighted that if the annual generation of waste for recycling goes down, it does not imply that the reuse of materials necessarily goes up, as the annual generation of waste may decrease for other reasons other than increased circularity.

B8 - Workforce – General characteristics:

12. On paragraph 44 (employee turnover rate), all SME representatives were against this datapoint stating that they did not understand how it was linked to sustainability.
13. On this point an SME representative highlighted how this rate may penalise micro and small SMEs, by leading them to have a high turnover rate, if a few employees decide to leave. This point was reiterated by many SME representatives who stated that this disclosure only works with large undertakings, where a couple of employees do not have a meaningful impact on turnover statistics.
14. On paragraph 45, the SME representative, highlighted their disagreement with the use of “non-employees”, and would rather prefer the use of the term “temporary agency workers”.

B9 - Workforce – Health and safety:

15. SME representatives had a common position against the inclusion of commuting accidents as part of work-related accidents. They stated that they disagree with the inclusion of commuting accidents in the VSME, even if national legislation will force users to ask this datapoint to SMEs.

B10 - Workforce – Remuneration, collective bargaining and training:

16. An SME representative asked to make paragraph 48 (c) (percentage of employees covered by collective bargaining agreements) an “if applicable” disclosure. The rationale is that for many specific SME sectors, there are not possible/ existing bargaining agreements.
17. Additionally, an SME representative stated that the threshold for paragraph 48 (b), should be 150 employees and not 100 employees; based on the Pay Transparency Directive (threshold of 150 employees until 2031, and then 100 from 2031 onwards).

B11 - Convictions and fines for corruption and bribery:

18. An SME representative stated that the SME is not legally forced to disclose its legal fines.

Entity-specific consideration when reporting on GHG emissions under B3 (Basic Module):

19. Point raised by SME representatives that paragraph 54 (scope 3 reporting for high impact sectors), should not be compulsory.

C2 - Gender diversity ratio in governance body:

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20. SME representatives stated that this disclosure is a red flag and should not be included in the standard.

C4 – Climate Risks:

21. On insurance for physical risks, the SME representative highlighted that it is not acceptable to ask for this datapoint even in a Y/N manner, as it leads to moral hazard.

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„VSME – Kosten-Nutzen-Analyse“
EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VMSE): EFRAG´s Cover Letter on the cost-benefit analysis for the Voluntary Sustainability Reporting Standard for non-listed SMEs (60 Seiten, pdf)

https://api.knowledgehub.efrag.org/dev-doc-attachment/efrags-cover-letter-and-cost-benefit-analysis-on-vsme.pdf

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#RV0398

EFRAG
sustainability reporting

EFRAG Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

Issued 01.12.2023

- EFRAG's Cover Letter on the cost-benefit analysis for the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

- Cost-benefit analysis for the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME) prepared by Syntesia Prometeia



EFRAG's Cover Letter on the cost-benefit analysis for the Voluntary Standard for non-listed SMEs (VSME)

The European Commission requires that EFRAG's Technical Advice is 'accompanied by cost-benefit analyses that include analyses of the impacts of the technical advice on sustainability matters.' Even though the Voluntary SME European Sustainability Reporting Standard (VSME) is outside the scope of the CSRD and will not be adopted by the European Commission as a delegated act, EFRAG has fulfilled the same obligation as the for the rest of the ESRS.

The objective of this cover letter is to explain how EFRAG has discharged this obligation for VSME.

EFRAG's Due Process Procedures (paragraph 2.22) states that « the purpose of Cost-Benefit Analyses is to understand the impacts of proposed ESRS and amendments to ESRS from various stakeholders' perspectives on a systematic basis to enable informed judgements about how to balance the needs of competing interests, including costs and benefits but also wider impacts on sustainability matters ».

EFRAG has commissioned Syntesia Prometeia (hereafter 'the contractors') to conduct an assessment of the costs and benefits of the VSME. The report is submitted to the EC and published together with the VSME and this cover letter.

In selecting the contractors, through a public tender process, EFRAG has in particular considered the experience of the contractors in conducting similar work and in particular the contractors' contribution to the Cost/benefit analysis on SME disclosure on taxonomy alignment conducted by the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs.

Contractors' report on the Cost-benefit analysis of the VSME

The contractors' report accompanying this cover letter assesses the possible costs and benefits of the VSME and presents the methodology, evidence and data collected in the context of the costs and benefits analysis to arrive at estimates. The study presents an assessment of the impact of the VSME across different stakeholder groups, these are mainly EU micro, small and medium sized undertakings as preparers; banks, investors and large undertakings as business counterparts of SMEs in the value chain as users. The survey design and the contractors' cost calculations followed the EU Standard Cost Model. In particular, the administrative costs were estimated by Syntesia Prometeia by retrieving data from the targeted consultation of preparers and service providers, as well as from the estimates provided in other related studies, the SME survey and the field test conducted by EFRAG. Quantifiable financial benefits have been estimated using existing economic literature and where possible previous studies.

The information and views set out in the contractors' report are those of the authors and do not necessarily reflect the views or opinion of EFRAG. The EFRAG Sustainability Reporting Board (EFRAG SRB) and the EFRAG Sustainability Reporting TEG (EFRAG SR TEG) have been informed of the work and progresses done by the contractors in the following meetings:

In June 2024, the EFRAG SR TEG and the EFRAG SRB were presented with an initial cost-benefit analysis of the VSME exposure draft published in January 2024. The contractors then provided a detailed report to the EFRAG SR TEG and the EFRAG SRB.

In a joint EFRAG SR TEG and EFRAG SRB meeting on 30 October 2024, the contractors updated the EFRAG SR TEG and EFRAG SRB members with the revised cost-benefit analysis conducted following the changes made to the VSME Standard after the public consultation.

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EFRAG's Cover Letter on the Cost-benefit analysis for the Voluntary Standard for SMEs (VSME)

On 20 November 2024, the contractors provided the EFRAG SR TEG and EFRAG SRB with their final report.

EFRAG has shared with the contractors the feedback received from the public consultation on the Exposure Drafts of the VSME. Specific questions in relation to the costs and benefit of the proposals were included in the consultation.

EFRAG acknowledges the information in the report and its conclusions. It also observes that the costs for individual companies depending on their circumstances may differ widely. Moreover, it should be underlined that the benefits, given their nature, can hardly be quantified and in the report the benefits are assessed mainly in qualitative terms.

EFRAG's consideration of costs and benefits in finalising its Technical Advice to the European Commission

In finalising its Technical Advice to the EC, EFRAG has considered the draft and final reports prepared by the contractors including the acknowledged limitations and uncertainties inherent to the ex-ante assessment of the costs and benefits of the VSME Standard.

EFRAG has also considered the extensive insight that it gained into the likely impacts and benefits of the draft VSME Standard through the public exposure of its proposals, which included several detailed questions at the level of each Disclosure Requirements on the cost/benefit profile, and through consultation, and outreaches with stakeholders, including the questionnaire and workshops with the preparers and users that participated to the Field Tests in May 2024. This feedback has led EFRAG to significantly review and streamline the proposals in the Exposure Draft of the VSME Standard. In particular:

- The Narrative-PAT module has been deleted. The content has been reallocated in a simplified semi-narrative format between the Basic and Comprehensive. modules. The practices, policies and future initiatives for transitions towards a more sustainable economy are to be reported only if the undertaking has them in place.
- The former Business Partners module has now been renamed **Comprehensive module.** The change of name was requested in the public consultation to flag that business partners may request more comprehensive information beyond what is covered via the Basic module.
- **Materiality** has been removed entirely. No materiality analysis is now asked to be performed by SMEs. The simplification was tested with both SMEs and banks representative and received strong support as it is expected to remove a large burden for reporting SMEs and also provide standardised disclosures for users' business partners.
- Additionally, a clear request that stemmed out from the public consultation has been the development of an **online tool** to serve as a simplified and guided process for SMEs to use when disclosing their information. While EFRAG can partially work on certain elements of guidance and stimulate the availability of such online tools, it will not develop them. In particular, the development of online platforms and tools (i.e., GHG calculators, geolocation tools) is considered by stakeholders as an essential element to facilitate the reporting as well as the comparability of information.

On this basis, in the revised CBA a majority of the identified savings are attributed to structural modifications, the costs of which were previously established through stakeholder consultations. Hence, there are no elements that would lead EFRAG to believe that the overall cost/benefit profile of the VSME is incompatible with the policy objectives of the Commission's SME Relief Package. In fact, the sensitivity analysis on analytical parameters suggests that net impacts are neutral to positive following the first year

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of implementation. In the central scenario, net impacts become positive from 2027, and increase in 2028. The positive results are driven by the lower recurring reporting costs, as well as the increasing benefits. This happens despite the CBA sensitivity analysis having been conducted with the assumption that the entirety of the two modules would be always reported on, which may not be the case for micro undertakings, which are expected to report only on the Basic Module.

EFRAG notes the following important conditions for the benefits expected to derive from the use of VSME: (i) the availability of online platforms that work at the same time as template and data repository, making the reported information available to multiple existing and potential business partners; and (ii) the availability at affordable costs of online tools supporting the preparation of the disclosure (e.g., GHG calculator).

In conclusion, EFRAG considers that in conjunction with the materialisation of the conditions identified in the consultation, the cost of VSME is likely to be largely off-set in due time by the corresponding benefits including those to the society and environment.

Yours sincerely,



Patrick de Cambourg (Chair of the EFRAG SRB)



Chiara Del Prete (Chair of the EFRAG SR TEG)

17 December 2024

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EFRAG

Cost-Benefit Analysis of the VSME

Submitted by:

Syntesia
Prometeia

20 November 2024

Stand: 01.02.2026

syntesia POLICY & ECONOMICS

prometeia

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ABSTRACT

This report presents the Cost-Benefit Analysis (CBA) of the Draft Voluntary European Sustainability Reporting Standard (VSME) prepared by EFRAG. The VSME is a reporting standard for non-listed micro, Small and Medium Enterprises (SMEs) which do not fall within the mandatory reporting requirements of the Corporate Sustainability Reporting Directive (CSRD). The VSME aims to harmonise and eventually replace ESG used by banks and large companies to collect data from SMEs.

The study quantifies the costs and benefits of VSME for preparers and includes qualitative considerations on other aspects. Scenario analyses were carried out to account for uncertainties in estimates. The key findings show that the net impacts from VSME are negative in the first year, because of implementation costs. They then turn positive from 2027 onwards, and grow to EUR 2,600 million by 2028, driven by lower recurring reporting costs and increasing benefits. More radical scenarios, e.g. in case provision of ESG information becomes *de facto* mandatory for accessing bank credit, would result in much higher positive impacts.

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ABBREVIATIONS AND ACRONYMS

BP	Business Partner
BTAR	Banking Book Taxonomy Alignment Ratio
CBA	Cost-Benefit Analysis
CDP	Carbon Disclosure Project
CRR	Capital Requirement Regulation
CSRD	Corporate Sustainability Reporting Directive
DMA	Double Materiality Assessment
EBA	European Banking Authority
ECB	European Central Bank
ECIROA	European Captive Insurance and Reinsurance Owners' Association
ED	Exposure Draft
EEA	European Economic Area
EMAS	Eco-Management and Audit Scheme
ESAP	European Single Access Point
ESG	Environmental, Social, and Governance
ESRS	European Sustainability Reporting Standards
GHG	Greenhouse Gas
GRI	Global Reporting Initiative
IIRC	International Integrated Reporting Council
IO	Information Obligation
LSME	Listed SMEs
NACE	Nomenclature des Activités Économiques dans la Communauté Européenne
NFRD	Non-Financial Reporting Directive
NGOs	Non-Governmental Organization
PAI	Principal Adverse Impact
PAT	Policies, Actions, Targets
PRI	Principles for Responsible Investment
PTF	Project Task Force
ROI	Return-On-Investment
SASB	Sustainability Accounting Standards Board
SBS	Structural Business Statistics
SCM	Standard Cost Model
SFRD	Sustainable Finance Disclosure Regulation
SMEs	Small and Medium Enterprises
SR TEG	Sustainability Reporting Technical Expert Group
SRB	Sustainability Reporting Board
TCFD	Task Force on Climate-related Financial Disclosures
UN SDGs	United Nations Sustainable Development Goals
VSME	Simplified Voluntary Reporting Standard for SMEs

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1 INTRODUCTION

This Report was prepared for the assignment 'Developing a cost benefit analysis for (i) the Listed SMEs, small non-complex credit institutions and captive insurance/re-insurances Draft European Sustainability Reporting Standard for listed SMEs (LSME); and (ii) the voluntary standard for non-listed SMEs (VSME)'. This report is submitted to EFRAG by Syntesia Policy and Economics in partnership with Prometeia.

The purpose of the Report is to present the results the **Cost-Benefit Analysis (CBA) of the VSME.** It is structured as follows:

- Section 2 describes the **legal background** and context of the VSME and the main features of the standard as they have been developed following the public consultation;
- Section 3 provides a summary of the **data collection** processes deployed;
- Section 4 presents the description of the **population** of SMEs;
- Section 5 describes the **methodology** followed for the assessment of the costs and benefits;
- Section 6 illustrates the **costs and benefits** of the final version of the VSME;
- Section 7 concludes, by presenting the **CBA of the VSME** and complementing it with qualitative findings and considerations.

The first results of the analysis related to the VSME ED were presented to the EFRAG Sustainability Reporting Board (SRB) and Sustainability Reporting Technical Expert Group (TEG) on 12 June 2024. The comments received have been incorporated in this analysis. As a result of the public consultation and the findings of the first CBA the text of the VSME has undergone a revision process. A provisional version of the CBA based on the text available as of 16 October 2024 were presented to both the SRB and TEG on 30 October 2024 and related comments have also been incorporated here.

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1.1 Purpose and scope of the study

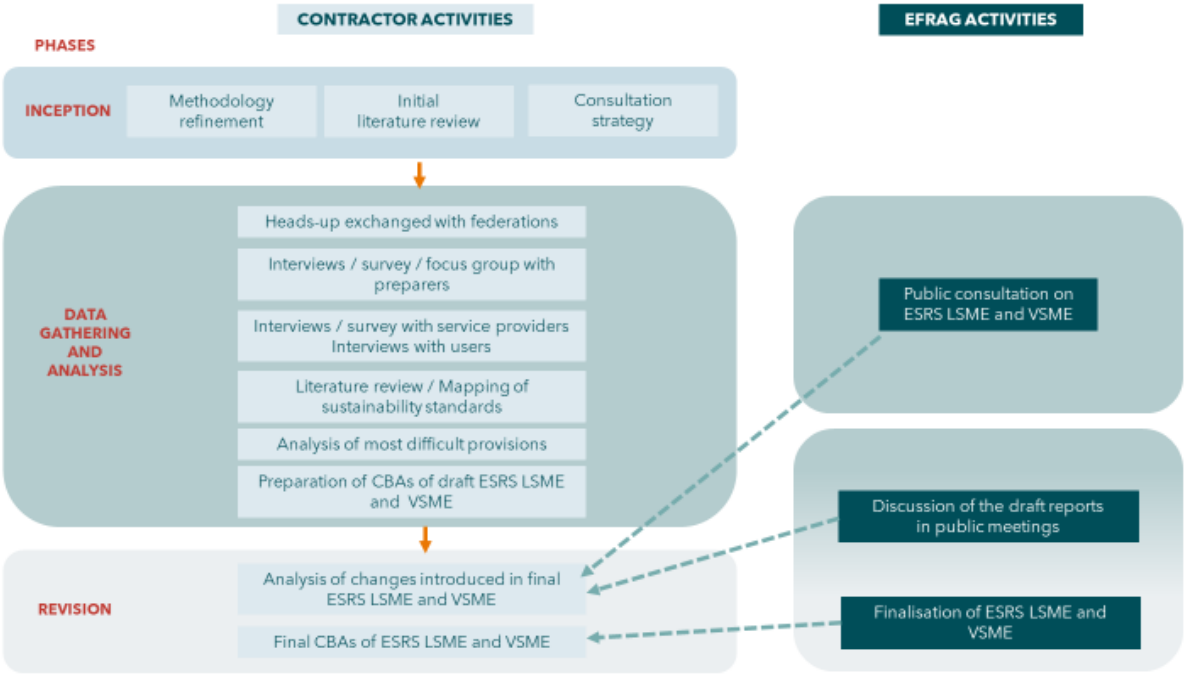
The overall purpose of the study is to provide **a CBA of the VSME, with its different target populations, and the VSME**.

The scope of the analysis includes an assessment of the **costs for the reporting SMEs and the benefits for** a broad set of stakeholders including **financial and management benefits, benefits from value chain participation, savings from harmonisation, impacts on competitiveness, as well as on increased transparency and accountability.** Not all these aspects did equally lend themselves to quantification, so a quali-quantitative approach was followed.

1.2 Activities undertaken

The assignment was envisaged to be carried out throughout three main phases: (i) inception, (ii) data gathering and analysis, and (iii) revision, summarized in Figure 1 and further detailed overfleaf. As the activities carried out by the study team and EFRAG were strictly interconnected, both are reported in the description of the assignment.

Figure 1. Overall approach of the assignment



The work on the assignment started on 23 November 2023; a start-up meeting was held online on December 4th between EFRAG and the study team, in which the structured outline report was presented. This was followed up by another technical follow-up between EFRAG and the study team on December 6th, and regular catch-up meetings starting from December 20th.

The **inception phase** was concluded by the end of January with the presentation of the inception report, including the refined methodology, an initial literature review, initial information on the populations affected by the standards, and the consultation strategy. The inception report was presented to the EFRAG SRB and EFRAG SR TEG on January 10th and was discussed on January 25th. The revised version of the inception report integrated the comments and reviews received by the SRB and SR TEG.

The **data gathering and analysis phase** was carried out from the end of January until May 2024. Throughout this phase a total of 75 interviews were carried out, including heads-up exchanges with European federations, and targeted interviews with national association, SMEs (listed and not), service providers, users and SMEs' business partners (lenders, large corporates, investors).

The first results of the CBA were presented to the EFRAG Sustainability Reporting Board (SRB) and Sustainability Reporting Technical Expert Group (TEG) on 12 June 2024 and discussed with all participants. This final report reflects some of the comments and insights provided by the SRB and TEG. The VSME was then revised also in the light of the results from the field tests and public consultation carried out by EFRAG. The study team has remained in contact with EFRAG during its work on revising the standards and attended as observers a number of SRB and TEG meetings, as well as the Bank Workshop on VSME held on 16 September 2024. Once the standard was closer to finalisation, a provisional CBA of results was carried out and presented to SRB and TEG on 30 October 2024.

The revision phase was concluded with the presentation of the **final CBA** on the approved texts in this report by end November 2024.

2 LEGAL BACKGROUND AND CONTEXT

The idea of having the VSME standard does not come from a legal requirement included in the Corporate Sustainability Reporting Directive (CSRD) The need for a voluntary ESG reporting standard for non-listed SMEs has been recently reaffirmed by the Commission in its **SME Relief Package**[1], and namely in action 14, which calls for the rapid adoption of such standard. The rationale behind its development was to prioritize the **identification of a proportionate set of indicators as a credible harmonised replacement** for the different Environmental, Social and Governance (ESG) questionnaires currently received by SMEs. This approach aimed to provide a framework that would allow SMEs to report on their ESG impacts with the same document in a manner that is manageable and relevant to their scale and capabilities. Therefore, **the focus was on providing tool for reporting the impacts relevant to the SME counterparts, in particular large customers and financial institutions, in a proportionate manner,** rather than a complete picture to inform all possible stakeholders.

The need to develop voluntary reporting standards for SMEs was first mentioned in the EU Commission Impact Assessment accompanying the CSRD in 2021[2] and then reiterated by several stakeholders during the work of EFRAG. The principles for a European Sustainability Reporting Standard (ESRS) Setting Process developed by EFRAG in the same year[3] further elaborated on the subject. After reaffirming the need to develop an SME-dedicated standard focused on the expectations of value chain counterparts and financial institutions, and coherent with related ESRS reporting requirements, the document made several key statements informing the subsequent VSME drafting process, and namely:

- The ESG information is relevant (i) for the reporting entity itself, (ii) for its value chain and (iii) for financial institutions was largely converging;[4] this would allow designing 'core SME' disclosures, limited in number and fit for purpose.
- SME sustainability reporting requirements should not merely be a simplified version of those for large reporting entities. These would likely not be fit for purpose and prove difficult and costly to produce. Instead, SME-specific sustainability reporting standards should be designed for SMEs on a stand-alone basis ('think small first') while ensuring that sustainability information provided by SMEs using such standards remains relevant for larger stakeholders.
- The new standard should address the lack of a dedicated ESG standard for SMEs and the fact that prevailing ones are considered as a potential administrative burden for them.[5]
- Size does not necessarily best reflect an SME's sustainability footprint and profile either, and so the business activity/sector and its associated risk profile should also be a primary driver for determining sustainability reporting requirements. Therefore, the report suggested considering a sector-specific approach towards sustainability reporting requirements for SMEs, which would lead

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[1] Communication from the Commission, SME Relief Package, COM/2023/535 final.

[2] "Consistent with the "think small first" approach, the standard-setter would develop a simplified standard for voluntary use by SMEs who are not under the scope of the NFRD. The simplified nature of this standard would reflect the fact that SMEs often do not have the technical expertise nor resources necessary to prepare reports in accordance with state-of-the-art, sophisticated standards." Commission Staff Working Document Impact Assessment Accompanying the Proposal for a Directive of the European Parliament and of the Council amending Directive 2013/34/EU, Directive 2004/109/EC, Directive 2006/43/EC and Regulation (EU) No 537/2014, as regards corporate sustainability reporting.

[3] https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2FEFRAG%2520PTF-NFRS_MAIN_REPORT.pdf

[4] The Corporate Reporting Dialogue, an initiative bringing together the major standard-setters and framework providers globally, had released a report on September 2019, showing high levels of alignment between the existing climate reporting frameworks on the basis of the TCFD recommendations. As part of the Dialogue's Better Alignment Project, CDP, CDSB, GRI, IIRC and SASB collaborated intensively to assess alignment on the TCFD's disclosure principles, recommended disclosures and illustrative example metrics. Corporate Reporting Dialogue (September 2019) Driving Alignment in Climate-related Reporting.

[5] Already a decade before, the first figures officially mentioned in the EU policymaking debate pointed to an estimated cost of EUR 15-25,000 for an SME to develop a Global Reporting Initiative (GRI) report, which was deemed as out of scale.

to sector-agnostic disclosures[6] applicable to all SMEs, and sector-specific disclosures for those operating in most high-impact sectors[7].

The development of the VSME involved a series of discussions and decisions by EFRAG's Technical Expert Group (SR TEG) and EFRAG's Sustainability Reporting Board (SRB). The process began with the first discussion of a VSME by the SR TEG on 17 November 2022[8]. Subsequently, the EFRAG SRB decided on 27 January 2023 to follow a building block approach[9]. This approach included discussions on whether to develop a single standard for all SMEs or to create two separate standards: one for listed SMEs and another for non-listed SMEs, identified as VSME. Since SME standards are primarily articulated based on the sector, and not on the size, the concept of modularity was designed to overcome, at least in part, the complexity of dealing with a broad and diversified class of undertakings, ranging from less than 10 to up to 249 employees. This modular approach was intended to allow for flexibility and scalability in sustainability reporting for SMEs. This decision-making process laid the groundwork for the development of the VSME standard.

Largely developed within EFRAG, the VSME initiative has then been gradually referenced and increasingly endorsed also in Commission policy documents. It was first mentioned in the Q&A related to the ESRS adoption[10] as a tool being developed by EFRAG to enable non-listed SMEs to *"respond to requests for sustainability information in an efficient and proportionate manner"*. In addition, the recently released SME Relief Package[11] refers to the VSME as a tool to support SMEs *"in accessing sustainable financing"*. Action 14, in particular, states that the Commission will "*ensure that SMEs have a simple and standardised framework to report on ESG issues*" and "*the rapid delivery of* ***voluntary standards for non-listed SMEs***". The VSME has also been increasingly referenced as a possible tool for banks to gather information to fulfil their Pillar 3 reporting requirements and to comply with the data needs of the upcoming EBA guidelines on the management of ESG risks. Furthermore, there have been requests to the Commission from a number of Member States and SME envoys to exert "moral suasion" on all the stakeholders involved to limit in practice their ESG requests to SMEs for the purposes of CRSD reporting to the contents of the VSME irrespective of the fact that it is the LSME representing the "value chain" cap legally speaking.

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2.1 Outline of the main VSME Features

The VSME is articulated into two[12] different modules:

1. the **Basic Module,** which provides the 'target' reporting standard for micro undertakings, and
2. the **Comprehensive Module,** summarising the likely requests from business partners within the value chain and the sustainable finance datapoints for lenders and investors.

[6] As regards the reporting structure it was noted that not all SMEs are required to prepare a management report. Finally, the ESS may also encourage the implementation of easy to communicate reporting means, e.g. through certifications evidenced by seals and logos (subject to appropriate verification processes), that indicate compliance with certain sustainability requirements and criteria. Moreover, the use of existing data and certifications to automatise the reporting process and decrease the administrative efforts required should be explored.

[7] The sector-specific sustainability reporting requirements for highly critical sectors should be based on EU policy priorities and legislative definitions (e.g. EU Taxonomy).

[8] The document discussed in November 2022 was part of the initial stages in the development of the VSME standard. It was identified as an Issue Paper by the former EFRAG Project Task Force ESRS (PTF-ESRS), specifically within cluster 8. This document served as a preliminary draft prepared by the EFRAG Secretariat and was presented during the SR TEG meeting on 17 November 2022. It marked the first discussion of VSME by SR TEG, setting the stage for the subsequent development and refinement of the VSME Exposure Draft through a series of versions and consultations, leading to the creation of a more structured and detailed Exposure Draft for further evaluation and feedback

[9] The building block approach, as discussed in the development of the VSME standard, is a methodological element designed to maintain consistency between the VSME standard and the European Sustainability Reporting Standards (ESRS).

[10] European Commission (2023), Questions and Answers on the Adoption of European Sustainability Reporting Standards, Brussels, 31 July 2023.

[11] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions SME Relief Package, COM/2023/535 final.

[12] An Additional Taxonomy Module acting as a residual placeholder for a link to taxonomy eligibility and alignment disclosure once an SME-dedicated version of the EU Taxonomy currently under preparation with the Platform on Sustainable Finance has been eventually approved by the Commission that has retained the right to act on it or not was eventually dismissed in latest versions of the VSME.

SMEs can choose between preparing the Basic Module only or complementing it with the other module, depending on their sustainability practices and the information requests received. However, the undertaking that wants to provide more comprehensive information may also integrate the metrics required in the Basic Module with selected disclosures from the Comprehensive Module.

2.1.1 Basic Module

The **Basic Module** is a kind of minimum reporting, envisaged primarily for micro-SMEs and ideally intended not to require support from an external consultant. It includes eleven disclosures, of which nine require quantitative datapoints:

- One introductory disclosure on the preparer;
- One cross-cutting disclosure on practices, policies and future initiatives;
- Five environmental disclosures;
- Three social disclosures;
- One business-conduct disclosure.

The disclosure requirements can be of a different nature as reported in Table 1 below:

1. **'Shall' mandatory disclosure requirements,** applicable to all companies;
2. **'If applicable' disclosure requirements**, referring to information that must be reported only when a company is concerned by the relevant metric or requirement (e.g. B2 on the company's practices for transitioning towards a more sustainable economy);
3. **'May' optional or voluntary disclosure requirements,** e.g. on type of land use in B5 on biodiversity or the gender pay gap in B8 workforce characteristics.
4. **"To be reported when above the threshold"** are applicable only to undertakings whose employment exceeds a given threshold.

As can be seen, there can be disclosure where different types of disclosures are mentioned in different paragraphs.

Table 1. Classification of VSME Basic Module Disclosures by Nature

Disclosure Requirements	Mandatory	If applicable	May Disclosure	Only if above Threshold
B 1 – Basis for preparation	✓	✓		
B 2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy		✓		
B 3 – Energy and greenhouse gas emissions	✓[13]			
B 4 – Pollution of air, water and soil		✓		
B 5 – Biodiversity		✓	✓	
B 6 – Water	✓	✓		
B 7 – Resource use, circular economy and waste management	✓	✓		

[13] Breakdown only if available

B 8 – Workforce – General characteristics	✓		✓	✓
B 9 – Workforce – Health and safety	✓			
B 10 – Workforce – Remuneration, collective bargaining and training	✓			✓
B 11 – Convictions and fines for corruption and bribery		✓		

Source: VSME

The specific contents and datapoints for each disclosure are the following:

1. **Basis for preparation (Disclosure B1 – Introductory).** This disclosure includes the basis of the sustainability report preparation, including whether the report is consolidated or individual, and the list of subsidiaries covered and basic information on the company size and activities undertaken (including the legal form, the number of employees, the NACE code(s), the turnover, the size of the balance sheet). The geolocation of the company sites must be indicated together with details about any ESG rating eventually obtained.
2. **Practices, policies and future initiatives for transitioning towards a more sustainable economy (Disclosure B2 – Cross-cutting).** Undertakings should report practices[14], policies and future initiatives to transition towards sustainability and related targets Reporting is in a checklist format and may avail itself of a simplified template with binary questions and lending itself to be transposed in a dropdown menu.
3. **Energy and greenhouse gas (GHG) emissions (Disclosure B3 – Environmental).** This disclosure involves reporting total energy consumption and GHG emissions. Energy consumption should be in MWh, with a breakdown between renewable and non-renewable fossil fuels and electricity, if available The Basic Module requires reporting on Scope 1 and 2[15] GHG emissions while Scope 3 emissions are foreseen just as an entity-specific disclosure[16] due to its complexity and the lack of free available tools for SMEs. The undertaking is also required to disclose emission intensity: i.e. total GHG scope 1 and 2 emissions by total turnover.[17]
4. **Pollution of air, water and soil (Disclosure B4 – Environmental).** Undertakings must report on an if applicable basis, their pollution impact, including emissions, effluents and waste affecting air, water and soil quality. Information must be provided when the law requires to report to competent authorities (e.g. under the Industrial Emissions Directive and the European Pollutant Release and Transfer Register) or SMEs already report according to an Environmental Management System, such as the Eco-Management and Audit Scheme (EMAS)[18].
5. **Biodiversity (Disclosure B5 – Environmental).** This disclosure requires information on the undertaking's impacts on biodiversity on an "if applicable" basis, i.e. depending on whether the company is located near a biodiversity relevant area. The number and area (in hectares) of sites in use

[14] Examples include initiatives to improve working conditions and equal treatment in the workplace, sustainability training for the undertaking's workforce, collaboration with universities related to sustainability projects, efforts to reduce the undertaking's water and electricity consumption or to prevent pollution, and initiatives to improve product safety.

[15] The VSME requires location-based Scope 2 Emissions. This approach calculates emissions based on the average emissions intensity of the electricity generated within the geographic location where the electricity is consumed. It takes into account the emissions associated with the average electricity mix in the area where the energy is consumed and allows for straightforward reporting. It differs from market-based scope 2 in that the latter account for the specific environmental attributes of the electricity they purchase and reflects the environmental benefits of purchasing renewable energy and incentivizes companies to invest in clean energy sources.

[16] Application requirements simply note that SMEs active in manufacturing, construction and packaging are likely to have significant scope 3 emissions.

[17] GHG intensity is envisaged to be calculated automatically, in a future online tool version of VSME.

[18] This is, actually, one of the few remaining instances of a synergy with the original idea of exploiting SME ESG certification schemes as one of the bases for VSME reporting.

in or near biodiversity sensitive areas must be reported. In addition, broader details can be reported on the total use of land, indicating the part in sealed areas[19] and in total nature-oriented areas on-site (roofs, façades, etc.) and off-site.

6. **Water (Disclosure B6 – Environmental).** It typically consists of water withdrawal (separately indicated for high-stress areas) and eventually water consumption. Whenever an undertaking withdraws water from the public water network and discharges it into the sewer, water consumption is close to zero and can therefore be omitted. Reporting on water consumption is required only if applicable. It can be argued this is particularly important for undertakings that have a significant water withdrawal and consumption, beyond the simple use from the public network, including those that draw water from other sources such as groundwater, rivers or lakes, which raises the issue of availability of water meters.
7. **Resource use, circular economy and waste management (Disclosure B7 – Environmental).** The disclosure concerns all companies, which are to report the total annual generation of waste in units of weight (preferably) or volume, broken down by type (non-hazardous and hazardous). Also, they must report the total annual waste diverted to recycling or reuse, expressed in units of weight (e.g., kg or tonnes). For undertakings operating manufacturing, construction and/or packaging processes the annual mass-flow[20] of relevant materials used as drawn from the EMAS methodology must also be reported.
8. **Workforce – General characteristics (Disclosure B8 – Social).** This disclosure requires information on the breakdown of workforce by type of employment contract, gender and, for the preparers operating in more than one country, country of employment. The companies with 50 employees or more are also required to disclose their employment turnover rate.
9. **Workforce – Health and safety (Disclosure B9 – Social).** The disclosure includes health and safety metrics, such as work-related accidents and fatalities.
10. **Workforce – Remuneration, collective bargaining and training (Disclosure B10 – Social).** This disclosure includes reporting on employee remuneration policies (including the gender gap beyond a certain threshold), the extent of collective bargaining coverage and training initiatives, highlighting the undertaking's commitment to fair labour practices and employee development.
11. **Convictions and fines for corruption and bribery (Disclosure B11 – Business Conduct).** In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.

2.1.2 Comprehensive Module

The **Comprehensive Module** provides for nine additional disclosures, of environmental (2), social (3), governance (2) and cross-cutting (2) nature. They also include the metrics that are required by financial market participants (based on their SFRD Principal Adverse Impact – PAI, Pillar 3 and the Benchmark regulation) and that may be relevant to other corporate clients. SMEs are expected to use this module when they receive ESG requests to assess their sustainability risks from business partners, such as customers or financial institutions. The key assumption is that **the Comprehensive Module, on top of the Basic module, can satisfy the data needs of both banks and corporate customers**, as SFDR PAI are considered proxies to manage the sustainability profile of SMEs clients (banks/investors) and customers (corporates). Most metrics in this module should be reported, for simplification purposes, under the "if applicable" principle.

[19] A sealed area means any area where the original soil has been covered (such as roads) making it impermeable. This non-permeability can create environmental impacts. The definition is not used for ESRS reporting purposes and is specific to the VSME only.

[20] The annual mass-flow is a measurement that helps companies understand how much material they use, which ties into rules for being efficient. Companies must share information about the materials they use, whether they buy them from suppliers or generate them internally. To determine the annual mass-flow, businesses should first figure out which materials are essential for their work (like how efficiently they're using wood). If a company uses different types of materials, it needs to keep track of each one separately, showing how much of each material it uses (like how many tons of wood it buys). This tracking includes all kinds of materials they use in their production, like raw materials and partially finished products, but it doesn't include energy sources or water. This information should be expressed in common measurement units such as weight (like kilograms or tons) or volume (like cubic meters), so it is easy to understand and compare.

The type of disclosure requirements is reported in Table 2 below according to the same criteria used for Table 1.

Table 2. Classification of VSME Comprehensive Module Disclosures by Nature

Disclosure Requirements	Mandatory	If applicable	May Disclosure	Only if above Threshold
C 1 -Strategy: Business Model and Sustainability-related initiatives	✓	✓		
C 2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy		✓		
C 3 – GHG Reduction Targets and Climate Transition		✓		
C 4 – Climate Risks		✓	✓	
C 5 – Workforce Additional General Characteristics		✓		
C 6 – Human Right Policies and Processes	✓	✓		
C 7 – Severe Human Rights Incidents	✓	✓		
C 8 – Revenue from Certain Sectors and Exclusion from EU Reference Frameworks	✓	✓		
C 9 – Gender Diversity Ration in Governance Body		✓		

The specific contents and datapoints for each disclosure are the following:

1. **Strategy: Business Model and Sustainability – Related Initiatives (Disclosure C1 – Cross-cutting).** The undertaking shall describe the key elements of its business model and strategy, including: significant groups of products and/or services offered (such as B2B, wholesale, retail, countries); main business relationships (such as key suppliers, customers distribution channels and consumers); and if its strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements
2. **Description of practices, policies and future initiatives for transitioning towards a more sustainable economy (Disclosure C2 – Cross-cutting)** If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, which it has already reported under disclosure B2 in the Basic Module, it shall briefly describe them. It may additionally indicate, if any, the most senior level of the undertaking accountable for implementing them.
3. **GHG emissions reduction target and climate transition (Disclosure C3 – Environmental).** Under this requirement, the company must report its targets for GHG emissions reductions, if adopted. Scope 3 emissions must be reported if the targets concern them as well. Undertakings operating in high climate impact sectors and adopting a transition plan may provide information about the plan, including an explanation of how it contributes to reduce GHG emissions. If it does not have one, it shall indicate whether and when this will be adopted.

4. **Climate risks (Disclosure C4 – Environmental).** If climate-related hazards or climate-related transition events have been identified the undertaking shall report them, disclose related exposure and sensitivity of assets, activities and value chain including their time-horizon and the climate adaptation actions undertaken. On a voluntary basis this can be complemented by a disclosure about effects on financial performance or business operations in the short, medium or long term and whether this risk is considered as high, medium or low.
5. **Workforce additional characteristics (Disclosure C5 – Social).** Small and medium companies above 50 employees may disclose the female to male ratio in management positions, as well as the number of self-employed working exclusively for the undertaking and temporary workers provided by companies specialised in such services.
6. **Human Rights Policies and Processes (Disclosure C6 – Social).** The undertaking shall answer in a binary yes or no format to questions on whether it has a code of conduct or human rights policy for its own workforce and whether this concerns: i) child labour, ii) forced labour; iii) human trafficking; iv) discrimination; v) accident prevention; vi) or other matters.
7. **Severe Negative Human Rights Incidents. (Disclosure C7 – Social).** The SME must answer in a binary yes or no format on whether it has had confirmed incidents related to i) child labour; ii) forced labour; iii) human trafficking; iv) discrimination or v) other related matters. It may disclose on a voluntary basis the actions undertaking to address them. Finally, the SME is to answer whether they are aware of any such confirmed incidents in their supply chain, affected communities, consumers and end-users and eventually explain them.
8. **Revenues from certain sectors (exclusion from EU reference benchmarks) (Disclosure C8 – Governance).** This disclosure focuses on the revenues generated from sectors that are considered sensitive or significant from a sustainability perspective, providing insight into the company's sectoral exposure. Additionally, the undertaking is to disclose whether it is excluded from the EU reference benchmarks that are aligned with the Paris Agreement[21].
9. **Gender diversity ratio in governance body (Disclosure C9 – Governance).** The disclosure asks for the gender diversity ratio in the governance body, if in place.

To validate the comprehensive module, EFRAG held a meeting with banks and other financial institutions under the assumption that these were more likely to use the standard as such, while corporate clients would complement it with more sector-specific requests. This supplemented and updated, also in the light of banks' own regulatory requirements,[22] the review that EFRAG had carried out of twelve real-life examples of ESG questionnaires from various sources[23] that was used as a foundation of the original VSME ED.

2.2 Main changes relevant to the Cost-Benefit Analysis

This section describes **the main changes between the VSME ED and its final version that are relevant to the CBA**, including their impact on preparers' reporting costs. The following list is not comprehensive of all the changes introduced. The impacts on reporting costs have been estimated based on data and parameters collected during the ED consultation activities, as well as the workshops and meetings organized by the EFRAG during the revision process, and independent analysis.

The VSME ED was greatly simplified in structure and disclosure types, driven by feedback from users and preparers during public consultation.[24] The modifications to the VSME ED can be categorized into two primary areas: structural changes and changes in the number and type of disclosures.

[21] These are defined in articles 12.1 and 12.2 of the Commission Delegated Regulation 2020/1818.

[22] In particular the likely consequences in terms of data requests of the upcoming EBA Guidelines on the Management of ESG Risks were considered. This was done based on the developments following the April 2024 consultation See https://www.eba.europa.eu/activities/single-rulebook/sustainable-finance/guidelines-management-esg-risks

[23] These included (i) two from national central banks; (ii) four from national federations; (iii) one from a national credit information provider; (iv) one from a national bank; (v) one from a rating agency; and (vi) three from banks and supply chain (international initiatives) actors.

[24] For instance, banks insisted on having data on the geolocation of company sites to be able to carry out their own analysis on climate risk exposure and commented on the limited usefulness of any materiality analysis in influencing the scope and size of their requests.

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➢ **Structural Changes**

- The VSME's structure has been streamlined by removing the Narrative PAT Module and replacing it with closed questions in the Basic Module. This change was influenced by feedback from banks during public consultations, to facilitate the processing of vast amounts of information.
- In the ED, the VSME included three modules: the Basic Module, and two optional ones: (i) Business Partners and (ii) Policies, Actions and Targets both requiring a materiality assessment. In the final version of the VSME, there are two modules: the Basic Module and the Comprehensive Module without the need for a materiality assessment.

➢ **Changes in the Number and Type of Disclosures**

- The total number of disclosures has been reduced from 26 (12 in the Basic Module, 5 in the Narrative PAT module, and 9 in the BP Module) to 20 (11 in the Basic Module and 9 in the Comprehensive Module).
- Three disclosures from the Policies, Actions, and Targets modules have been added to the Basic Module: (i) N1 Strategy: business model and sustainability-related initiatives; (ii) N3 and N5 on the management and governance of sustainability matters (N3 applies only to companies with PATs in place – likely a minority of VSME preparers, while N5 is voluntary) in a very simplified checklist format suitable for a dropdown menu. The remaining two narrative disclosures were dropped.
- The scope of some of the disclosures in the basic module (e.g. B1 and B8) has been slightly expanded. Cumbersome calculation of content of recycled material for SMEs active in manufacturing, construction and processing has been replaced by mass-flows considerations.
- The voluntary disclosure on workers in the value chain and stakeholders (B11) from the ED Basic Module, considered one of the most burdensome to understand and comply with, has been removed.
- Former disclosures BP3 and BP4 on GHG emissions and transition plans have been merged.
- Three DRs have been deleted from the Comprehensive Module (BP on Hazardous and Radioactive Waste, BP10 on work-life balance and BP11 on apprenticeship) because deemed hardly relevant.
- Former BP7, BP8 and BP9 containing complex and cumbersome references to other international legislation and reliance on ILO, UN and OECD instruments designed for multinationals, have been replaced by much simpler binary questions. The new reference to the exemption from EU benchmarks in Paris Alignment in C8, that could sound obscure to the non-specialist reader, has been spelled out in the text of the standard.
- Former disclosure BP5 on physical risks from climate change, considered out of reach for many SME preparers, has been simplified, making the most cumbersome and costly parts optional (e.g., the disclosure of financial effects of physical climate risks).

➢ **Impact on Costs**

- The reorganization of disclosures, the elimination of reference to international standards, the wider use of closed or yes/no questions has led to an estimated reduction of 10-30% in the internal personnel time required for preparing sustainability statements.
- The propensity to use platforms or other automated means for preparing sustainability statements is estimated to increase by 15-35% for smaller preparers and by 5-25% for larger ones.
- The elimination of the materiality assessment will save preparers the associated costs, previously estimated between EUR 6,000 and 20,000.
- The Comprehensive Module, which includes elements required by banks and financial institutions, is likely to be requested from 50% of micro and small enterprises with less than 20 employees) applying for bank loans and 100% of medium and small enterprises with 20 employees or more. This means that the estimated population using the comprehensive module is going to be larger compared to the share of preparers that were estimated to use the business partner module.

The expected impacts on costs are summarised in Table 3 overleaf.

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Table 3. Expected impacts on VSME revisions on costs

Change	Impact on reporting costs	
Streamlining, removing of narrative disclosures, elimination of references to international guidelines	Reduction of preparers' internal costs by 10-30% More likely use of platforms and automated means because of simpler, YES/NO or closed questions: 15-35 pp. for smaller preparers, 5-25 pp. for larger preparers	
Removal of materiality assessment	Reduction of preparers costs (not for basic module): 6,000 – 20,000 €	
DRs in the Basic Module	Largely comparable scope, no changes to costs associated (±10% sensitivity analysis)	
DRs in the Comprehensive Module	Largely comparable to those included in the BP module	
Nature of requests from financial institutions	Feedback from financial institutions suggest that in many cases the comprehensive module will be requested. Uncertainty whether all banks will request it for all types of loans - 50% of micro enterprises and small enterprises with less than 20 employees will be requested the comprehensive module by banks (sensitivity: 25-75%) - All small enterprises with 20 employees or more and medium enterprises will be requested the comprehensive module by banks (low scenario at 80%)	

3 DATA COLLECTION

The analysis used both primary and secondary sources, including:

- **Interview programme**. The study team conducted an interview programme involving preparers, service and IT providers, and users to collect primary data from stakeholders directly involved in the adoption of the standards. The interview programme was divided into heads-up exchanges and targeted consultations aimed at gathering various forms of evidence from stakeholders, including data and parameters to quantify costs and benefits, market acceptance of the standards, information on populations covered by the disclosure requirements, as well as feedback on the most challenging or costly aspects. The interview programme was shared with the analysis of the LSME; some stakeholders were asked questions on only one draft standard, some questions (e.g small banks, consultants) were asked questions on both draft standards.

- **Public consultation and field test on LSME and VSME Exposure Drafts**. EFRAG carried out a public consultation and field test exercise on the LSME and VSME Exposure Drafts. The field test involved SMEs and users evaluating the Exposure Drafts, providing information on their feasibility, costs, challenges, benefits, and usefulness. This report incorporates the analysis of the field test results, as well as the findings from the public consultation.

- **Participation into EFRAG VSME Consultation Activities after Public Consultation and Field Test.** To better follow developments and related cost assessment considerations the study team attended several EFRAG SRB and SR TEG online meetings in July, September and October. The team also specifically attended the VSME Bank Workshop on September 16th, which specifically reviewed DR relevance and usefulness from a user's perspective.

- **SME survey.** In a recent study for the European Commission, the Study Team conducted a survey on SMEs regarding their ESG reporting practices, covering 13 Member States and more than 4,400 companies. The survey includes estimates relevant to the analysis of current ESG costs and practices.

- **Literature review.** Several studies have estimated costs and benefits related to the scope of this study and have been used to validate the estimates or fill data gaps.

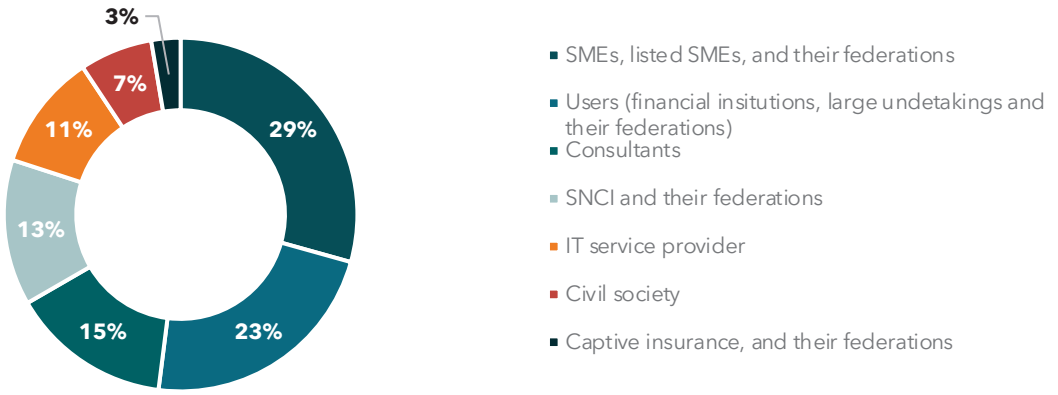
In the following sections, all the data collection processes will be described in greater detail.

3.1 Interview programme

The interview programme constituted one of the main sources of data for this assignment and was necessary given the complexity of the topic and the need to obtain sufficient data on future benefits and the likely adoption scenarios for the ED standards. The interview programme was divided in two phases: (i) an initial round of heads-up interviews and (ii) a targeted consultation.

Overall, **a total of 75 interviews were carried out during the whole interview programme**, of which 14 during the heads-up interviews and 61 during the targeted consultation. As shown by Figure 2Figure 2, SMEs and their federations represented 29% of the participants, making them the largest group in the interview programme. The second group consisted of users (23%), which included financial institutions and large undertakings and their federations.

Figure 2. Overview of the interview programme



3.1.1 Heads-up interviews

The **heads-up interviews** were aimed at collecting initial information and insights by the federations of the stakeholders directly concerned by these standards. During these interviews, business federations were also requested to elicit the participation from their members to the following consultation activities. The heads-up interviews were scheduled with the most relevant EU federations representing the stakeholders' directly involved by the standards, and namely:

- **Generalist business federations** i.e., SME United and Eurochambres.
- **EU business federations of smaller banks**, and namely the European Association of Co-operative Banks and the European Savings and Retail Banking Group.
- **EU business federation of users**, namely the European Banking Federation and Business Europe.

The interviews were based on an open-ended questionnaire, which focused on the interviewees' assessment of the standard an on understating the relevant population. Initial questions were also targeted at understanding the current costs of sustainability reporting and the foreseen benefits.

3.1.2 Targeted consultation

The targeted consultation consisted of different strands targeted at the different categories, including directly involved stakeholders, following up on the approach adopted during the heads-up interviews. More specifically, during the targeted consultations, direct contact was established with individual SMEs through their association, which in most cases allowed the organisation of focus groups or acted as a liaison to gather the views of several members. Interviews were also conducted with financial institutions, as users.

On top of these entities, interviews with IT platforms and service providers offering sustainability reporting services were also carried out. In fact, as the quantification exercise concerns an obligation (i.e., its standard) which is not yet in force, cost and benefit data could not be retrieved (only) from likely affected entities.

Interviews were carried out based on a semi-structured questionnaire, including both closed questions for the collection of comparable data, and open questions to discuss broader qualitative issues. Questionnaires were tailored to the various stakeholder segments. Seven questionnaires have been prepared for the various categories, addressing different topics, as summarized in Table 4 below.

Table 4. Topics of the questionnaire

Stakeholder	Topics				
Non-listed SMEs	Current reporting practices	VSME Relevance	Cost of VSME	Other costs and benefits	
Listed SMEs	Current reporting practices	Cost of LSME	Other costs and benefits	User perspective and relevance of VSME	VSME Relevance and LSME value chain cap

Financial institutions	Current reporting practices	Cost of LSME	Other costs and benefits	Sustainability information request	VSME Relevance and LSME value chain cap	VSME other costs and benefits
Corporate users	Current reporting practices	Sustainability information request	VSME Relevance and LSME value chain cap	Other costs and benefits		
Service providers (both questionnaires)	ESG reporting by SMEs	VSME	Costs of VSME reporting	Other costs and benefits	LSME	

3.2 EFRAG public consultation

In parallel to the targeted consultation, EFRAG also consulted all relevant stakeholder affected by the adoption of these standards. More in detail both for the VSME and LSME, a field test and a public consultation were carried out starting from January to May.

The public consultation aimed at gathering feedback from stakeholders on (i) (i) the relevance of the proposed disclosures; (ii) the simplifications achieved; and (iii) the market acceptance of the VSME ED, (iv) the proposed architecture; and (v) the implementation of CSRD requirements, particularly the role of the LSME ED in defining the value chain cap for information to be reported by large undertakings.

In addition, the field tests[25] were run in parallel to the public consultations to provide additional fact-based evidence. The main purpose was indeed to gather facts and indication on the challenges and benefits of the ED's content from stakeholders who will prepare actual disclosures.

The Field Test for VSME focused on the following key elements:

- The costs and challenges associated with each of the disclosures;
- The understandability of the guidance provided in the ED and its ability to support the implementation of the disclosure requirements; and
- The expected benefits of the disclosures

Once the consultation phase was closed, EFRAG organised a series of workshops, for the participants to the VSME field test. These were also attended by the study team, to complement and validate the information collected through the other primary and secondary sources as described in this Section.

The participation to EFRAG's consultation package was as follows: 164 respondents to the VSME Field Test Respondents, 311 VSME public consultation responses and 22 comment letters.

The study team could also evaluate the results of the EFRAG own public consultation as presented to both SRB and SR TEG in July (EFRAG VSME documents 05-04, 05-05, 05-06).[26]

3.3 Participation into EFRAG VSME consultation activities after public consultation and field test

The study team followed post-consultation standard revision and development activities by attending the related SRB and SR TEG online meetings from July to November. On top of that the study team participated to the EFRAG VSME Bank Workshop on September 16th.

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[25] Questionnaire of the field test are available here: https://www.efrag.org/News/Public-479/EFRAGs-

[26] The results of the public consultation are available at the following link: https://www.efrag.org/en/news-and-calendar/meetings-calendar/efrag-srb-meeting-10-july-2024

3.4 SME survey

In a recent study for the European Commission,[27] the study team carried out a survey on SMEs about their ESG reporting practices, covering 13 Member States and more than 4,400 respondents. The survey took place in July 2023. The survey includes estimates which are relevant to the current analysis, such as the share of SMEs that already engage in sustainability disclosures, the costs thereof, the amount of duplicated requests from buyers and financial institutions. Most of the information is available per size segment, i.e. for micro, small and medium enterprises, as well differentiated between listed and non-listed SMEs. This information has been particularly useful to estimate baseline costs and the current uptake of ESG standards, which served as a basis for determining future adoption, cost and benefits scenarios.

The SME survey covered 13 Member States: the four largest (France, Germany, Italy and Spain), three five north-western EU countries (Denmark, Finland, Belgium, the Netherlands and Sweden), three Central and Eastern European countries (Hungary, Poland and Romania), and one Southern country (Greece). The Survey attracted between 250 and 500 SMEs in each of the EU Member States covered. After the removal of noisy data, outliers and incomplete or inconsistent answers, a total of 4 404 completed questionnaires have been analysed.

In terms of enterprise size, the majority (74%) of respondents were micro enterprises, 16% were small enterprises and 10% were medium-sized enterprises. As far as the sector of activity is concerned, a granular classification was adopted, comprising most manufacturing and service sectors, with the exclusion of agriculture and forestry. To reduce the bias produced by non-responses and underrepresented groups, results have been extrapolated to the EU level based on the EU SME population. Weights for the various size class (micro, small, and medium) and industries (1-digit NACE code) were extracted from Eurostat Structural Business Statistics (SBS)[28].

3.5 Literature review

The assignment included a desk review of relevant policies and existing studies and estimates, concerning the CSRD specifically, as well as other disclosure requirements (e.g. SFRD, taxonomy) and ESG frameworks and standards (e.g. GRI, SASB, IIRC, TCFD, CDP, GHG protocol, UN SDGs, etc).

The review encompassed, first and foremost, studies and analysis of CSRD, the ESRS standards[29] and related EU policies, including impact assessment documents and implementation reports,[30] as well as EFRAG preparatory works.[31]

Other data sources include thematic publications (e.g., from the Principles for Responsible Investment (PRI), an UN-supported network of investors), academic studies, 'grey' literature, such as industry reports. The grey and academic literature analysing the linkages between sustainability reporting related costs and

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[27] Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Giannotti, E., Bolognini, A., Pal, T., (2024) SME disclosure on taxonomy alignment – Cost/benefit analysis – Final report. Volume 1, Publications Office of the European Union, https://data.europa.eu/doi/10.2873/48775

[28] Eurostat SBS describe the detailed structure, economic activity, and performance of businesses over time, database available here: https://ec.europa.eu/eurostat/web/structural-business-statistics/database

[29] All EFRAG Draft ESRS for LSME and VSME *cfr,* EFRAG SR TEG 13 July 2023, Agenda paper 03-02, Agenda paper 03-03, Agenda paper, 03-04, Agenda paper, 03-05, Agenda paper, 03-06; and EFRAG draft VSME ESRS Paper 04-02. Also Input Papers, i.e., EFRAG Secretariat (2023), Input Paper basis for conclusions LSME ESRS, EFRAG SR TEG meeting, 19 June 2023, Paper 03-02, and EFRAG Secretariat (2023), Input Paper basis for conclusions VSME ESRS, EFRAG SR TEG meeting, 13 July 2023, Paper 04-04; and EFRAG Secretariat (2023), Building blocks LSME and VSME (revised version) – after SR TEG meeting 19 June and SRB 26 June 2023 Issues Paper, 13 July 2023 Paper 04-05

[30] Commission Staff Working Document-Impact Assessment Accompanying the document Proposal for a Directive of the European Parliament and of the Council amending Directive 2013/34/EU, Directive 2004/109/EC, Directive 2006/43/EC and Regulation (EU) No 537/2014, as regards corporate sustainability reporting, 21 April 2021

[31] All EFRAG Draft ESRS for LSME and VSME *cfr,* EFRAG SR TEG 13 July 2023, Agenda paper 03-02, Agenda paper 03-03, Agenda paper, 03-04, Agenda paper, 03-05, Agenda paper, 03-06; and EFRAG draft VSME ESRS Paper 04-02. Also Input Papers, i.e., EFRAG Secretariat (2023), Input Paper basis for conclusions LSME ESRS, EFRAG SR TEG meeting, 19 June 2023, Paper 03-02, and EFRAG Secretariat (2023), Input Paper basis for conclusions VSME ESRS, EFRAG SR TEG meeting, 13 July 2023, Paper 04-04; and EFRAG Secretariat (2023), Building blocks LSME and VSME (revised version) – after SR TEG meeting 19 June and SRB 26 June 2023 Issues Paper, 13 July 2023 Paper 04-05

societal benefits is still under-developed[32] because the mandatory reporting requirements are recent, and most indirect benefits are not yet visible to society.

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[32] The starting point for a review of this subject is by Christensen, H. B., Hail, L. and Leuz, C. (2021), 'Mandatory CSR and sustainability reporting: economic analysis and literature review', Review of Accounting Studies, 26(3), pp. 1176–1248. A EU-centered perspective can be found in La Torre, M., Sabelfeld, S., Blomkvist, M. and Dumay, J. (2020), 'Rebuilding trust: sustainability and non-financial reporting and the European Union regulation', Meditari Accountancy Research, 28, pp. 701–725, doi:10.1108/medar-06-2020-0914

4 POPULATION - THE ENTITIES CONCERNED

4.1 EU SME population

The VSME concerns all SMEs falling outside the scope of the CSRD, i.e. whose securities (including stocks, bonds) are not traded on a regulated market. This means that **the VSME can be applied by the vast majority of the about 32 million EU SMEs**[33] operating in the industry and service sectors.[34] A description of the SME population, as updated by the most recent Eurostat figures is presented in Box 1 below. This is a proxy of the criteria integrated to the Accounting Directive[35].

Box 1. SME definition

More in detail, according to Eurostat,[36] nearly 32 million SMEs operate in the industry and services sector in the EU, which is more than 99% of the total number of companies. As shown in Table 5, the vast majority (94%) consist of micro companies with less than 9 employees; small businesses with 10 to 49 employees represent 5% of SMEs, with medium companies with more than 49 employees account for about 1%. Companies with less than 20 employees – defined 'smaller preparers' for the quantification of costs – represents 97% of the total population. Limited liability companies, which are typically required to publish their accounts under the Accounting Directive, amount to about 13.7 million, the other being non-limited (e.g. personal) companies.[37]

Table 5. EU SME population

	Number ('000)	%
Micro	30,119	94%
Small	1,579	5%
Of which: => 20 employees	*1,039*	*3%*
Of which: < 20 employees	*540*	*2%*
Medium	247	1%
Total	**31,945**	

Source: Eurostat SBS

In terms of sectoral distribution, the largest number of SMEs operate in the wholesale and retail trade (18%), professional activities (16%), and construction (12%). Manufacturing accounts for about 7% of the total number of SMEs; this sector is more prominent among small and medium enterprises.

[33] In theory, a VSME could also be applied by non-EU SMEs (e.g. for own business decisions, to apply for a subsidy or a loan in the EU). While this is possible the geographical scope of this analysis and of the subsequent CBA is on EU companies.

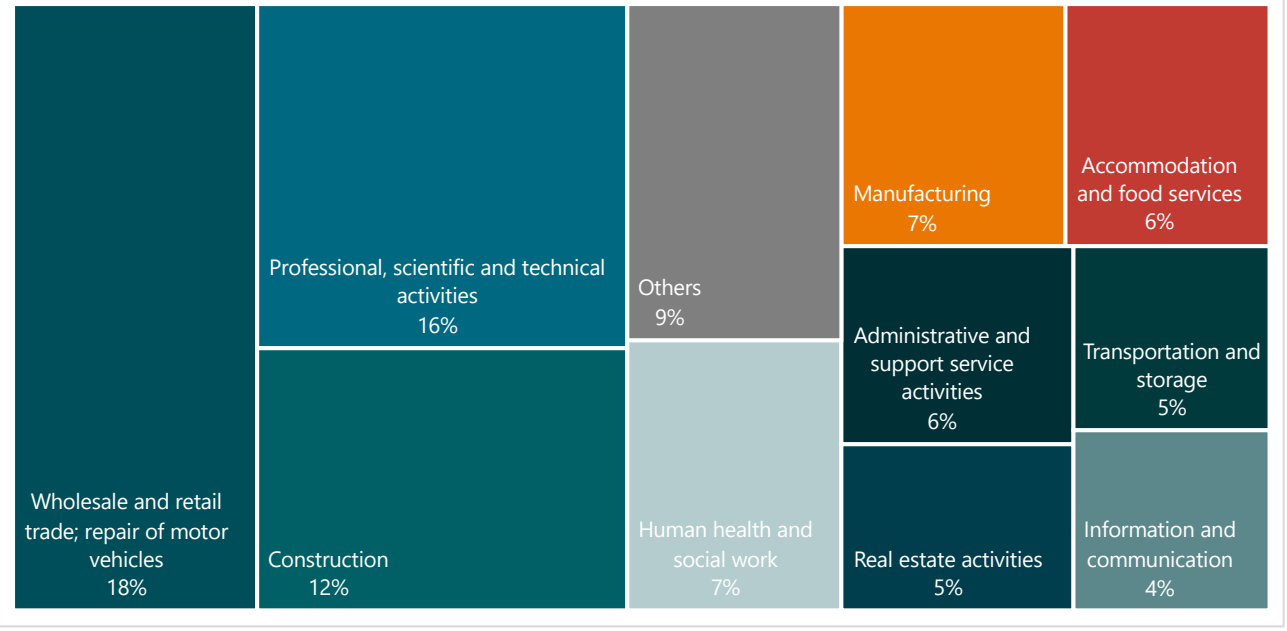
[34] It can also be used by companies in the primary sector (i.e. agriculture, fisheries and forestry); given their specific business form and the structure of EU statistics, these cannot be added to the analysis, but are likely to represent few additional million enterprises potentially involved.

[35] An undertaking is micro if it does not exceed two of the following threshold: i) €450,000 in balance sheet total, ii.) €900,000 in net turnover, and iii. 10 employees. An undertaking is small if it does not exceed two of the following thresholds: €5 million in balance sheet total, ii. €10 million in net turnover, or iii. an average of 50 employees. An undertaking is medium if it does not exceed two of the following thresholds: I €25 million in balance sheet total, ii. €50 million in net turnover, and iii . 250 employees. Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (Text with EEA relevance), and related amendments ELI: http://data.europa.eu/eli/dir/2013/34/2024-01-09

[36] Eurostat (2023) Structural Business Statistics, retrieved from https://ec.europa.eu/eurostat/web/structural-business-statistics/database

[37] Commission Staff Working Document Impact Assessment Accompanying the document Proposal for a directive of the European parliament and of the Council on payment services in the internal market and amending Directives 2002/65/EC, 2013/36/UE and 2009/110/EC and repealing Directive 2007/64/EC and Proposal for a Regulation of the European Parliament and of the Council on interchange fees for card-based payment transactions /* SWD/2013/0288 final */

Figure 3. Distribution of SMEs across sectors at the EU level



Source: Eurostat's Structural Business Statistics (2022)

4.2 VMSE preparers

Two categories of SMEs are likely to issue ESG reporting based on VSME:

- **Spontaneous preparers.** These are SMEs perceiving to receive a direct net benefit from issuing detailed and harmonised ESG statements based on the VSME. These are likely to be found among:
  - SMEs active in B2C '**green markets**', with value proposition targeted to environmentally-conscious consumers
  - SMEs selling products and services centred on sustainability (e.g. advanced manufacturing, ESG-related services), including when active in B2B value chains
  - SMEs active on the green public procurement market
  - SMEs with a special attention to ESG issues (e.g. B-corp)

Consistent data on these different populations are not available. However, the amount of spontaneous preparers is likely to correspond to the share of SMEs which, already today, voluntarily engage in ESG reporting. In 2023, about 5% of EU SMEs did so, and about 10% more expressed their intention to start in the following years.38 Spontaneous preparers are thus estimated to represent, in the following 5 years, about 15% of the EU SME population.

- **Preparers upon request**. This group includes SMEs receiving a request from the value chain or financial institutions to provide ESG information. In this case, the adoption can be direct, when the SME is requested to provide a VSME statement; or indirect, when the SME is requested to provide ESG information, and the SME decides to use VSME statements to this purpose.

  The potential population of preparers upon request include (i) those who demand bank credit, which are estimated to represent about 20% of the SME population;[39] (ii) suppliers of large corporations, which are estimated to represent about 12% of the SME population (see Box 2 overleaf); and (iii) those requesting funds or participating in the green public procurement market[40]. Of these potential population, some SMEs may still prefer to respond directly to the request (e.g.

[38] SME survey.

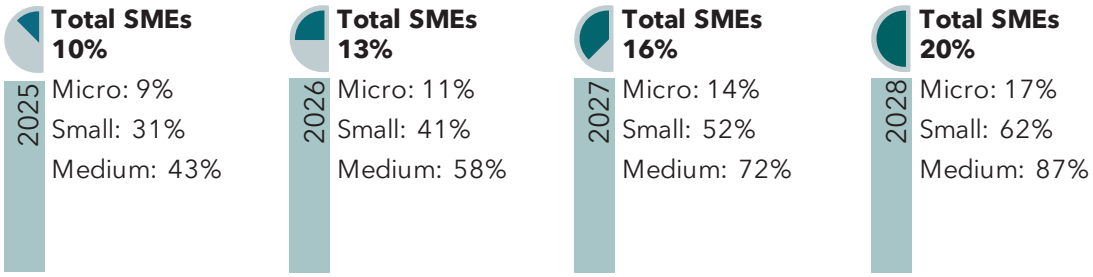
[39] OECD (2022), Financing SMEs and Entrepreneurs 2022: An OECD Scoreboard, available at https://www.oecd.org/cfe/financing-smes-and-entrepreneurs-23065265.htm

[40] No detailed data is available in this respect, since, at the moment, ESG disclosures are not a mandatory requirement, though this is likely to become the case in the future.

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when the request has scope much narrower than the VSME). Within this population, estimates on the number of preparers upon request are obtained by considering the number of SMEs which currently receive a request, and projecting a reasonable growth over the period of analysis, as shown in Figure 4 below. Preparers upon request are expected to represent a majority of the potential population.

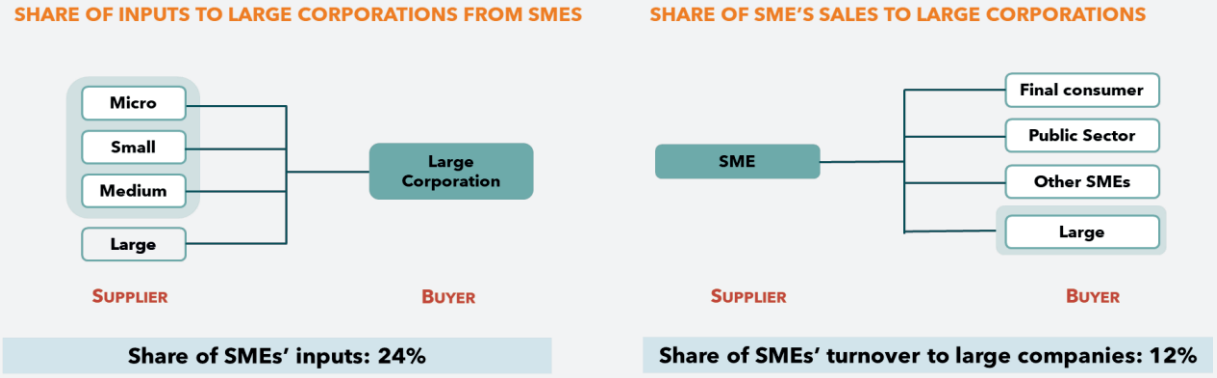
Figure 4. Potential population of prepares upon request



Box 2. Share of SMEs supplying to large corporations

SMEs are an important supplier for large companies, providing about a quarter (24%) of their inputs. Conversely, large companies are an important client for SMEs, albeit not on the same scale. SMEs supply to other SMEs, final consumers, public entities or large companies. The former represent about 12% of their turnover. These estimates, shown in Figure 5 below, are obtained from the EU supply and use tables provided in Eurostat's national accounts.

Figure 5. Supply relationships between SMEs and large companies



Source: Eurostat's national accounts

4.3 Specific populations

The VSME has a modular structure: the basic module is mandatory, and then companies can decide whether to use the comprehensive module. The latter module is likely to be requested by financial institutions, and hence its uptake is estimated to be higher compared to the business partner module that was foreseen in the VSME ED.[41] In particular, it is expected that **all medium enterprises and small enterprises with20 employees or more will use the comprehensive module; for micro enterprises and small enterprises with less than 20 employees, the uptake is expected to be lower, and is assumed to concern 50% of the preparers upon request**. This is based on the feedback received from banks during the workshops on the revised VSME draft. Given the uncertainty on this parameter, a sensitivity analysis is carried out as follows: (i) micro and small (less than 20 employees) enterprises: 25%, 50% (base) and 75% scenarios; (ii) for small (20 employees or more) and medium enterprises, 80% and 100% (base).

Additionally, the VSME includes a number of 'if applicable' requirements which are mandatory, but only they concern only a sub-set (sometimes very limited) of the population. Hence, the cost estimates need to

[41] It was estimated that 12-20% of preparers upon request would use the business partner module, and 1-5% more would use the full VSME.

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take into account the more limited application of certain requirements. In Table 6 below, an attempt is made to measure some of these sub-populations for the requirements in the basic module.

Table 6. VSME sub-populations for the basic module

Requirement	Sub-population	Estimate	Source
B2 - Practices for transitioning towards a more sustainable economy	SMEs that have adopted practices, targets, actions or plans towards sustainability	It is very unlikely that SMEs have adopted sustainability policies and plans. Hence, the population concerned is residual, not higher than 1% of the total VSME population.[42]	Targeted consultation
B4 – Pollutants	SMEs that report on pollutants e.g. under the Industrial Emissions Directive or the Eco-Management and Audit Schemes (EMAS)	The Industrial Emissions Directive covers about 55,000 industrial sites; EMAS covers about 4,000 organisations and 13,000 sites. Another major certification, ISO 14001, covers about 92,000 companies in Europe. There may be a degree of overlap between the Industrial Emission Directive and the certification schemes. Considering that a large number of those sites belong to large companies, SMEs directly affected by this requirement can be estimated in the area of 50,000.	EMAS Factsheet, European Pollutant Release and Transfer Register ISO survey
B5 – Biodiversity	SMEs with operations near protected areas are more likely to have to report on biodiversity impacts	26% of EU land areas is protected (18% under Natura 2000 schemes, 8% under national schemes). Companies operating within or near these areas, typically belong to sectors like agriculture, forestry, tourism, and energy. Considering that protected areas have a much lower density of economic activities, it is considered that this requirement will concern less than 13% of the VSME population.	EU Biodiversity Strategy for 2030 - Bringing nature back into our lives (COM(2020)380).
B6 – Water	All SMEs should report their water withdrawal. When water is used for the production process (and withdrawal is different than discharge into sewer), water consumption should also be reported.	Water consumption is likely to be reported only by 'production' (as opposed as to 'services') sector, and in particular: Manufacturing SMEs (3.8 million); construction SMEs (2.1 million); energy, water and mining (about 300,000 SMEs).	Eurostat SBS
B 7 – Resource use, circular economy and waste management	All SMEs should report on resource management and the application of circular economy principles, including the amount of waste generated and diverted to recycling and re-use. Companies in the manufacturing, construction or packaging process should report on mass-flows.	Manufacturing SMEs: 3.8 million; Construction SMEs: 2.1 million; Packaging SMEs (NACE code N82.92): 10,000.	Eurostat SBS

[42] Cf. SME survey.

B8 – Workforce – General characteristics	SMEs with at least 50 employees should report on the turnover rate over the reporting period. This is a new datapoint introduced following the review process.	Medium enterprises: 247,000 (about 1% of the total SME population). The same population is also concerned by other disclosures adopting the same threshold (e.g. C5).	Eurostat SBS
B 10 – Workforce – Remuneration, collective bargaining and training	SMEs with at least 150 employees should report on the percentage gap in pay between its female and male employees. The threshold is reduced to 100 employees from 2031.	This datapoint only concerns a fraction of medium enterprises, i.e. less than 1% of the EU population, corresponding to about 50-100,000 enterprises.	

5 COST-BENEFIT ANALYSIS METHODOLOGY

This section describes the overall approach and the methodology for the estimation of the costs and benefits generated by the application of the VSME. Table 7 below summarises the categories of costs and benefits that have been assessed in the present study, identifying also the type of costs and benefits (whether direct or indirect), the stakeholders affected, and the methodology used to assess them. The following sections are going to describe in greater detail the methodology. More in detail, Section 5.1 is deals with administrative costs, Section 5.2 with financial benefits and 5.3 with other costs and benefits. Finally, section 5.4 described the overall CBA methodology.

Table 7. List of costs and benefits

	Type	Stakeholder	Methodology
COSTS			
Administrative costs of reporting	Direct	Preparers	Quantitative
BENEFITS			
Financial benefits: • Cost of credit • Access to credit	Direct	Preparers	Quantitative
Value chain participation	Direct	Preparers	Quantitative
Competitiveness	Indirect	Preparers	Qualitative
Management, reputation and improved internal organisation	Indirect	Preparers	Qualitative
Increased transparency, comparability accountability	Indirect	Preparers, users	Qualitative

5.1 Administrative costs, baseline costs and incremental costs

Administrative costs consist in those costs that firms must incur to provide information to public authorities and third parties because of a regulatory requirement, i.e. the so-called Information Obligation (IO).

To estimate administrative costs, first, the **administrative activities** for VSME reporting must be mapped. These are the steps taken by listed SMEs to collect and provide the required information. **Administrative costs are then calculated via the Standard Cost Model** (SCM), adapted as necessary. In a nutshell, the SCM takes the number of entities subject to an IO (the population) and multiply it by the estimated cost per occurrence, to obtain the total administrative costs generated by a regulatory provision. More details are provided in Box 3 overleaf.

Box 3. The Standard Cost Model

The Standard Cost Model (SCM) is a method for assessing the administrative costs imposed by regulation on i.a. businesses and public administrations. It is based on the identification of the basic components of a piece of legislation, i.e. the Information Obligations, whose costs for the regulatory addressees can be measured and quantified. An Information Obligation is a specific legal duty to gather, process or submit information to a public authority or a third party. The SCM can be used both on the stock of existing legislation to perform a baseline measurement, and on the flow of new legislative proposals to measure the cost increase or savings associated with a set of policy options.

The key outputs of the SCM are as follows:

- Administrative Costs (AC) are the overall costs incurred by businesses and public administrations to meet legal obligations to provide information, either to public authorities or private parties.
- The costs for information which is, at least partly, gathered, processed or submitted even in the absence of a legal requirement are considered Business-As-Usual (BAU) costs.
- Conversely, an administrative activity which is performed solely because of a legal obligation is defined as an Administrative Burden (AB). AC are thus formed by two components: BAU costs and AB. The estimate of ABs measures the additional effect of regulatory provisions.

As set out in the Better Regulation Guidelines, administrative costs should be assessed on the basis of the normal cost of the required administrative activity multiplied by the total number of activities performed per year. The core SCM formula can therefore be written as follows:

$$AC = \Sigma (P \times Q)$$

Where:

[P] = the 'Price' is obtained by multiplying a tariff (based on average labour cost [43] per hour including overheads) by the time required to perform the required activity.

[Q] = the 'Quantity' is calculated as the number of required administrative activities, or as the population concerned (number of affected entities) times the frequency of the required activities.

In operational terms, the time devoted to complying with the IO by a "normally efficient firm" is estimated based on data from the targeted consultation. This value is then multiplied by the salary rate of the staff dealing with the IO and by the number of yearly occurrences (frequency) of the IO. When respondents do not possess detailed information on the cost of each occurrence, companies may be asked for more general information, such as the number of employees working on a certain IO and/or the share of working time per week or per year that each of them devotes to the IO. Once the annual cost per IO is identified, aggregate costs can be calculated for the whole industry by multiplying the cost per IO by the number of firms affected (the population). The administrative costs generated by an act can be thus quantified by summing up the costs of all IOs included therein.

In certain cases, compliance with an IO requires not only personnel time, but also out-of-pocket expenses (e.g. the fees for an external consultant or for accessing an online software). In this case, the quantification is based on a 'normal price' for the service required by the IO and on an estimation of the share or types of companies that outsource the IO vs. those dealing with it internally (e.g., medium enterprises are more likely to internalise tax and accountancy functions compared to micro). When expenses concern durable goods (e.g. IT equipment), this needs to be depreciated based on the appropriate time frame (e.g. 5 years), with financial costs added based on a typical interest rate for bank loans for corporations and/or the opportunity cost of capital.

Administrative costs are analysed across different dimensions:

- The analysis distinguishes between enterprises with 20 employees or more (medium and part of small enterprises) and enterprises with less than 20 employees (micro and part of small enterprises), given the different complexity of reporting, modalities of compliance and hence the costs associated.
- Another dimension analysed concerns internal and external costs, i.e., those costs that are born in-house versus those costs that are linked to outsourced activities.
- The analysis distinguishes between set-up costs and recurring costs, i.e. to implement and maintain the reporting processes. This is because the reporting costs are typically higher in the first year due

[43] This is estimated as an EU average value although it is acknowledged there can be major variations across Member States and by company size and sector.

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to the familiarisation with the new requirements, and the set-up of the internal and data collection and analysis tools; they then decrease in the following years.

Following the assessment of the VSME uptake, described in section 4.2 **the analysis of costs concerns prepares upon requests.** This is because for spontaneous preparers the choice is 'purely' voluntary, and no regulatory costs can be attributed to voluntary decisions. Conversely, preparers upon request are SMEs that have to issue sustainability statements in response to demands for ESG information from their value chain or financing providers, particularly banks.

The analysis accounts for the following costs:

- **Administrative reporting costs**, i.e. the costs for preparing sustainability statements based on the VSME.
- **Baseline costs**, i.e., the costs for handling ESG requests and providing ESG information in the scenario without VSME. These are those borne by SMEs to handle requests from customers and financial institutions. These are in turn determined by: (i) the share of SMEs received those requests; (ii) the number of requests for each SME; and (iii) the cost of these requests.
- **Incremental costs**, i.e., the true regulatory costs of VSME, resulting from the difference between administrative reporting costs and baseline costs.

For the **analysis of the administrative costs,** the data have been retrieved from the targeted consultation of preparers and service providers, as well as on the estimates provided in other related studies, the SME survey, and the field test (see Table 8 below). To complement and validate the data collected during the interview programme, the impact assessment on CSRD[44], the CBA of the First Set of draft ESRS[45], and the CBA on SME disclosure of taxonomy alignment were also consulted and integrated in the analysis where relevant.

The **estimates deriving from the interview programme and EFRAG's field test were the main source of information for the analysis of the reporting costs**, including incremental costs and baseline costs as these provided real world cases directly reported from SMEs.

Table 8. Summary table for administrative costs and burdens

Cost/benefit	Methodology	Sources
Administrative costs of reporting	Analysis of administrative activities required	Targeted consultation of preparers, service providers, existing studies
	Estimation of internal and external costs, degree of outsourcing	Targeted consultation of services providers (preparers), existing studies
	Estimation of incremental costs vs. baseline costs	Targeted consultation of preparers, service providers
	Population concerned	See Section 4 above
	One-off vs- recurring costs	Targeted consultation of preparers, service providers, existing studies

5.2 Benefits: financial and value chain participation

5.2.1 Financial benefits

The financial benefits of ESG reporting have been extensively debated over the last two decades in the economic literature. Most of this literature on the impact of ESG disclosure has traditionally concentrated on the analysis of the relationship between ESG, the cost of capital and the overall firm value. with a focus on listed companies[46]. There is an emerging consensus that ESG disclosures **reduce the cost of capital,**

[44] Commission Staff Working Document-Impact Assessment Accompanying the document Proposal for a Directive of the European Parliament and of the Council amending Directive 2013/34/EU, Directive 2004/109/EC, Directive 2006/43/EC and Regulation (EU) No 537/2014, as regards corporate sustainability reporting, 21 April 2021

[45] The cost estimates might appear, however, in retrospect as underestimated also because of data aggregation issues between different countries. CEPS and Mileu for EFRAG (2022), Cost-benefit analysis of the First Set of draft European Sustainability Reporting Standards, Brussels, 22 November 2022

[46] Albarrak, M.S.; Elnahass, M.; Salama, A. The Effect of Carbon Dissemination on Cost of Equity. Bus. Strateg. Environ. 2019, 28, 1179–1198. Botosan, C.A. Disclosure Level and the Cost of Equity Capital on JSTOR. Account. Rev. 1997, 72,

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which broadly replicates similar findings for the benefits from traditional financial disclosures[47] in the past. **This is however not particularly relevant for non-listed SMEs, for which access to equity represents a residual source of financing accounting for 1% of total financing,** according to ECB and Commission SAFE survey figures[48]. Hence, prospective benefits from ESG reporting on the cost of capital would be poorly significant and hardly relevant for most preparers, for whom the most important source of financing is represented by far by bank financing and external lending.

Over the last few years, an increasing number of studies has demonstrated a relationship **between a ESG disclosures, their quality and granularity[49] and the cost of debt financing[50]** Hence there is growing evidence of a likely link between the issuance and quality of ESG reporting and the availability of better credit conditions for borrowers. This is believed to happen through several channels. Lenders incorporate ESG information into their decisions primarily by reducing their information asymmetries. Because of these information asymmetries, lenders are inclined to penalize information opacity and to reward corporate transparency with a lower cost of debt. More and better ESG information allows lenders to assess both **the reputational and credit risk linked to a loan[51]**. Reputational risk involves being perceived as a financial enabler of harmful ESG practices, which predominantly affects credit institutions. Credit risk pertains to the loss of the principal amount of the loan. According to the economic literature, the correlation mechanisms between ESG disclosures, those risks and then the cost of debt can emerge from several channels:

- ESG disclosures provide **additional information** that is not captured by traditional financial and risk metrics. Better ESG datapoints, after accounting for the information explained by conventional risk measures, are associated with lower costs of debt, suggesting that ESG factors offer unique insights into a company's risk profile and financial health.
- Companies with extensive disclosures are perceived to have **lower reputational and operational risks**, which can translate into lower borrowing costs. This perception stems from the understanding that strong ESG practices, of which reporting per se is already one, can mitigate potential negative impacts related to environmental, social, and governance issues, thereby reducing the overall risk profile of the company.

323–349. Botosan, C.A. Disclosure and the Cost of Capital: What Do We Know? Account. Bus. Res. 2006, 36, 31–40. Dhaliwal, D.S.; Li, O.Z.; Tsang, A.; Yang, Y.G. Voluntary Nonfinancial Disclosure and the Cost of Equity Capital: The Initiation of Corporate Social Responsibility Reporting. Account. Rev. 2011, 86, 59–100. Clarkson, P.M.; Fang, X.; Li, Y.; Richardson, G. The Relevance of Environmental Disclosures: Are Such Disclosures Incrementally Informative? J. Account. Public Policy 2013, 32, 410–431. Vitolla, F.; Salvi, A.; Raimo, N.; Petruzzella, F.; Rubino, M. The Impact on the Cost of Equity Capital in the Effects of Integrated Reporting Quality. Bus. Strateg. Environ. 2020, 29, 519–529.

[47] In traditional financial reporting, past researchers found that disclosure laws have a positive impact on firm value and argued that mandatory disclosure increases firm value by improving return on assets. La Porta, R., Lopez-de-Silanes, F., Shleifer, A. and Vishny, R. (2000), "Investor protection and corporate governance", Journal of Financial Economics, Vol. 58 Nos 1/2, pp. 3-27

[48] Survey on the Access to Finance of Enterprises, available at: https://www.ecb.europa.eu/stats/ecb_surveys/safe/html/index.en.html

[49] Raimo N., Caragnano A., Marianil M., Vitolla F. Integrated reporting quality and cost of debt financing, Journal of Applied Accounting Research, 2022, vol.23, no. 1, pp.122-138

[50] The first study to document evidence suggesting that the debt market perceives value in the information presented in ESG reports, beyond what is furnished in financial reports was Mohammad Badrul Muttakin & Dessalegn Mihret & Tesfaye Taddese Lemma & Arifur Khan, 2020. "Integrated reporting, financial reporting quality and cost of debt," International Journal of Accounting & Information Management, vol. 28(3), pages 517-534. This was subsequently confirmed with reference to the European context by Gerwanski, J. (2020), "Does it pay off? Integrated reporting and cost of debt: European evidence",Corporate Social Responsibility and Environmental Management, Vol. 27 No. 5, pp. 2299-2319 by Raimo, N.; Caragnano, A.; Zito, M.; Vitolla, F.; Mariani, M. Extending the Benefits of ESG Disclosure: The Effect on the Cost of Debt Financing. Corp. Soc. Responsib. Environ. Manag. 2021, 28, 1412–1421. Eliwa et al. (2021). ESG practices and the cost of debt: Evidence from EU countries, Critical Perspectives on Accounting. Dunne T. C., In the interest of small business' cost. In general, the literature agrees that green finance leads to green results, such as emission reduction and energy saving, or improving green performances. Indeed, there is evidence in the literature that green finance can address and steer corporate sustainability levels by directing investment decisions towards more sustainable companies and penalizing those that are less so. of debt: A matter of CSR disclosure, Journal of Small Business Strategy, № 29, с. 58; Sengupta P., Corporate disclosure quality and the cost of debt, Accounting Review, № 73, с. 459.

[51] O. Weber, R.W. Scholz, G. Michalik Incorporating sustainability criteria into credit risk management, Business Strategy and the Environment, 19 (2010), pp. 39-50, 10.1002/bse.636

- The impact of ESG disclosures on the cost of debt operates through both direct and indirect channels. Directly, higher ESG disclosures can lead to a more favourable assessment of credit risk by lenders due to perceived lower reputational and operational risks. Indirectly, ESG scores may influence the cost of debt by affecting other variables that lenders consider when setting interest rates, such as the company's **long-term sustainability and resilience**. This is in line with the original rationale behind the introduction of the CRSD where ESG reporting was considered as a tool against financial market short-termism.
- The correlation between disclosures and debt costs also varies depending on a company's level of indebtedness. Firms with higher levels of debt may experience more significant benefits from higher ESG disclosures compared to those with lower levels of indebtedness. This suggests that the impact of ESG disclosures on borrowing costs is not uniform across all companies and may be more pronounced for those with greater financial obligations as it **enables their access to credit**. Moreover, the argument has been made that banks might benefit even more from ESG information because it provides them with a comprehensive view of a company's risk profile and sustainability, beyond what traditional financial metrics can offer. In bank-based financial systems where long-term relationships between lenders and borrowers are prevalent, the return on companies' ESG efforts in terms of reduced cost of debt is higher, indicating that banks value the additional information contained in ESG disclosures.

When it comes to the magnitude of the impact, however, the evidence base is thinner and contested[52]. Most of the studies estimate the impacts of an 'increase' in the amount of ESG information provided, rather than on whether ESG statements are issued or not. Those models allow to identify whether ESG information reduces the cost of debt, but do not provide any meaningful estimate of the amount of the reduction[53]. In addition, the available analyses focus on publicly listed companies, whose cost of debt and ESG disclosures are tracked by data providers and find it hard to disentangle between the effects of providing ESG information, the quality thereof, and ESG performance. Among those contributions, only two papers highlight a quantitative impact of issuing an Integrated Report. Gerwanski *et al.* estimate an impact between 35 and 44 basis points;[54] Muttakin *et al.* estimate an impact of 26 basis point, which however becomes significantly smaller when controlling for a company's ESG performance.[55] One study that tries to differentiate the impacts for listed vs. non-listed companies suggest that the effect of ESG disclosure for the latter may be nil[56]. All in all, the evidence from the economic literature is inconclusive and points out to a limited impact of ESG disclosure on the cost of debt. This is consistent with the results from the targeted consultation, which suggests that, at the moment, SMEs engaging in ESG disclosure enjoy very limited credit cost advantages, if anything.

A very recent analysis, carried out in cooperation with the European Central Bank, use an internal database of bank lending, which covers all lending relationships in the EU worth more than EUR 25,000.[57] This allows to capture a much broader number of companies in the analysis, the vast majority of which are SMEs. Their research strategy is different, as they try to estimate whether banks adhering to sustainability commitments increase the cost of debt for 'brown' sectors. Their estimates, in a 95% confidence interval, is that the debt cost increase is not higher than 5 basis point. This can be considered as the best estimate of the likely advantage for SMEs engaging in ESG disclosure, with sensitivity scenarios at 5, 10, and 25 basis points (bp),

[52] Eliwa et al. (2021). ESG practices and the cost of debt: Evidence from EU countries, Critical Perspectives on Accounting. Raimo, R., Caragnano, A., Zito, M., Vitolla, F., Mariani, M. (2021). Extending the benefits of ESG disclosure: The effect on the cost of debt financing. Corporate Social Responsibility and Environmental Management.

[53] Cf. e.g. Degryse, H., Goncharenko, R., Theunisz, C., & Vadasz, T. (2023). When green meets green. Journal of Corporate Finance, 78, 102355; Eliwa et al. (2021). ESG practices and the cost of debt: Evidence from EU countries, Critical Perspectives on Accounting; Raimo, R., Caragnano, A., Zito, M., Vitolla, F., Mariani, M. (2021). Extending the benefits of ESG disclosure: The effect on the cost of debt financing. Corporate Social Responsibility and Environmental Management.

[54] Gerwanski, J. (2020). Does it pay off? Integrated reporting and cost of debt: European evidence. Corporate Social Responsibility and Environmental Management, 27(5), 2299-2319.

[55] Muttakin, M. B., Mihret, D., Lemma, T. T., & Khan, A. (2020). Integrated reporting, financial reporting quality and cost of debt. International Journal of Accounting & Information Management, 28(3), 517-534.

[56] Chi, W., Wu, S. J., & Zheng, Z. (2020). Determinants and consequences of voluntary corporate social responsibility disclosure: Evidence from private firms. The British Accounting Review, 52(6), 100939.

[57] Sastry, P. R., Verner, E., & Ibanez, D. M. (2024). Business as Usual: Bank Net Zero Commitments, Lending, and Engagement (No. w32402). National Bureau of Economic Research.

representing more hypothetical scenarios in which regulatory or market pressure leads banks to compete for clients that disclose their ESG performance.

In addition, ESG reporting can indirectly provide benefits as an enabling factor. Since an increasing amount of concessional lending to SME is subject to ESG conditionalities, ESG disclosures represent a precondition and greatly enhance the chance that SMEs are recognized as eligible and can get **access to these concessional lending for sustainable investment** that can be granted at a 10-30 bp discount, although this is not necessarily additional to the pure effect from reporting above. Also, in that case ESG reporting can play the enabling factor to access to the possible 10-30 bp greeniums on concessional lending. The amount of concessional lending for sustainable investment is estimated at EUR 3-6 billion per year.[58]

Another direct effect related to the fact that ESG disclosure provides additional information to banks and financial institutions that enrich their credit risk analysis and decision-making, particularly if this is accessible to them in a codified standardized format and very low cost. By serving as a tool to transmit information not fully included in financial disclosures, ESG disclosure can reduce information asymmetries between firms and their investors or creditors, thereby potentially improving the firm's **access to lending**. Increased access to lending will not concern, in general, any form of loans, but those linked to sustainability (sustainable finance). In the EU, the value of these credit segments is estimated at EUR 15-27 billion. Results from a recent cost-benefit analysis carried out for the Commission shows as a part of that that banks can reward detailed environmental information with a 10-20% increase in SME access to lending, which is in line with findings from academic research.[59]

From a broader societal perspective**, ESG disclosure can have a positive impact on the corporate sustainability of firms**, as disclosing environmental and social strategies strengthens corporate sustainability performance. This not only benefits the firm internally but also enhances the social value created by corporations. For instance, initiatives promoting sustainability and ESG awareness can increase demand for sustainable investments. In general, the literature agrees that green finance leads to green results, such as emission reduction and energy saving[60], or improving green performances. Indeed, there is evidence that green finance can address and steer corporate sustainability levels by directing investment decisions towards more sustainable companies[61] and penalizing those that are less so.

The VSME can thus also result in the promotion of green lending and investment, as financial institutions encourage companies to adopt more sustainable practices by offering loans with reduced interest rates linked to sustainability criteria, with the amount of the loan adjusted according to the company's level of sustainability. The impact becomes even more significant when a sustainable company borrows from a sustainable lender[62]. The impacts on green financing are already included in the estimates above. More in detail, the reduction in the cost of credit and the increase in the access to credit incorporate both the effects of better disclosure, and the fact that part of the disclosure will show a positive ESG performance, which will give access to sustainable finance mechanisms, resulting from the joint actions of concessional lending, regulatory and marketing pressure on financial institutions.

Therefore, the use of the standardized and simplified frameworks proposed by the VSME can enable investors and financial intermediaries to assess sustainability-related risks and opportunities more effectively, when deciding on investments and financing. Moreover, the reporting framework allows for a comparison of investment possibilities and allocation of funds to more ESG responsible companies through a 'more sustainable is better' competition. Another relevant issue for financial institutions is compliance with increasing regulatory demands to enhance the sustainability of their assets. A more standardized approach in this respect can improve the usability of reporting. It is important to note that key barriers to

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[58] European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Giannotti, E., Bolognini, A., Pal, T., (2024) SME disclosure on taxonomy alignment – Cost/benefit analysis – Final report. Volume 1, Publications Office of the European Union

[59] *Ibidem*

[60] Cfr Note 50

[61] A matter of CSR disclosure, Journal of Small Business Strategy, № 29, с. 58; Sengupta P., Corporate disclosure quality and the cost of debt, Accounting Review, № 73, с. 459.

[62] Degryse, H., Goncharenko, R., Theunisz, C. and Vadasz, T. (2023). When green meets green. Journal of Corporate Finance, 78.

the use of ESG information are the lack of common reporting standards and, as a result, the lack of comparability, reliability, quantifiability and timeliness[63].

Based on the above analytical framework and parameters, the quantitative estimation needs to distinguish between benefits in the cost of and access to credit and capital:

- For the **reduction in the cost of credit,** the ESG credit premia (5-10-25 basis points, 10-30 bp for concessional lending) highlighted above needs to be multiplied by the amount of credit and concessional lending. The total outstanding SME loans in the EU, set at EUR 2.5 trillion, based on OECD data[64]; the preparers are assumed to receive, on average, the same amount of loans as the total SME population.[65] The amount of concessional lending for sustainable investment is estimated at EUR 3-6 billion per year.
- For **increase in access to credit,** the additional loans are not a monetary benefit per se, but only to the extent to which they generate additional profits. These are estimated by considering a typical Return-On-Investment (ROI) for SMEs, net of the cost of debt (5.9%, based on ORBIS data).

Table 9. Summary table for financial benefits

Benefit	Methodology	Sources
Cost of credit	Estimation of the relationship between quality of ESG disclosure and cost of debt	Economic literature
	Estimation of the 'greenium factor', including the effect of sustainable financing tools and concessional lending	Economic literature
Access to credit	Increased access to credit enabled by better ESG disclosure and sustainable financing	Economic literature, previous studies

5.2.2 Value chain participation

Together with request from financial institutions, the other big driver of ESG information requests consists of **large corporate buyers,** which have to collect ESG data for their own reporting duties, or for business and marketing purposes. Engaging in sustainability reporting thus may reduce the **risk of losing access to the value chain for SMEs**, or, conversely, provide benefits in terms of continuous access thereto. This risk concerns SMEs which are not subject to mandatory reporting requirements, and hence is relevant to the analysis of VSME.

To estimate the risk of losing access to the value chain, two parameters are important: the size of the effect, and its likelihood in the short- and medium- term.

- To measure the **size of the value chain participation effects**, national accounts data provide information on the supplies from SMEs to large corporations over total sales (which also include final consumers, public entities, other SMEs).
- As for the **likelihood of the effects,** this results from the reaction of large buyers. In particular, it requires determining, based on the analysis of existing studies and the targeted consultation, whether and to what extent ESG disclosure will result in increased revenues. In this respect, there is no available evidence in the economic literature and the findings from the targeted consultation suggest that this is very limited at the moment. Hence, this will be calculated based on a scenario analysis.

[63] Zadeh et al. (2018) Why and How Investors Use ESG Information: Evidence from a Global Survey, Financial Analysts Journa

[64] OECD (2022), Financing SMEs and Entrepreneurs 2022: An OECD Scoreboard, available at https://www.oecd.org/cfe/financing-smes-and-entrepreneurs-23065265.htm

[65] In other words, if VSME preparers are 5% of the population, they are expected to receive 5% of the oustdanding amount of loans.

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5.3 Other costs and benefits

Adopting the VSME standard – either spontaneously or upon request - can trigger other indirect costs and benefits in three areas identified, namely (i) competitiveness, (ii) management, reputation and improved internal organisation; and (iii) increased transparency and accountability.

In terms of **competitiveness**, although there is no strict correlation, adherence to the VSME standard can enhance a company's market position by improving the perceived value of its products or services. This can lead to access to green markets, such as green public procurement and environmentally conscious consumers. However, there are also potential downsides, such as the risk of EU companies becoming less competitive against companies not reporting voluntarily on ESG matters, thus avoiding associated costs and disclosing possibly sensitive information, especially for that typically operate on very thin competitive advantages.

From a **management and organizational perspective**, sustainability reporting can significantly influence how companies manage their activities and allocate responsibilities. By requiring companies to disclose their sustainability performance, the importance of ESG policies within the organization is heightened, reducing operational risks and the likelihood of defaults. This increased awareness can lead to better integration of ESG considerations into daily management, ensuring functions and responsibilities are aligned accordingly. Also, by promoting green lending and investment, financial institutions encourage companies to adopt more sustainable practices by offering loans with reduced interest rates tied to sustainability criteria.

Increased transparency and accountability are significant outcomes of adopting the VSME standards. By committing to open communication and providing a clear understanding of their operations and impact, companies can align their practices with societal expectations and values. This transparency not only fosters trust among investors, customers, employees, suppliers, and the broader community but also holds companies accountable for their environmental, social, and governance impacts. The ongoing dialogue and collaboration resulting from ESG reporting can increase social capital, as stakeholders observe and trust the company's commitment to sustainable practices.

The analysis of these indirect costs and benefits has been carried out based on qualitative sources. More in detail, the possible correlation between the publication of ESG reports and effects on competitiveness have been addressed for instance by Breuer, M. (2021), and Dinh, T., Husmann, A. and Melloni, G. (2021) and Allen, A., Lewis-Western, M. and Valentine, K. (2022). Importantly, the targeted consultation provided first hand evidence on how current ESG practices are generating positive or negative effects on SMEs' competitiveness, internal management and increased transparency and accountability, which allowed to have a baseline scenario. Evidence was also collected directly by SMEs – and their federations, and by civil society to understand what will change in these three areas if an SME decides to comply with the VSME.

5.4 Overall CBA methodology

The CBA[66] is a method of comparing the costs and benefits associated with a certain policy, regulation or requirement, in order to assess whether it generates net costs of benefits for the entities concerned. A **key feature of the CBA is that all or most costs and benefits are quantified and expressed in monetary terms**. Once costs and benefits have been monetised and discounted (if occurring at different time horizons), they are summed up, with the aim of identifying the policy option based on the net impacts (i.e. benefits minus costs). The major limitations of the CBA concern the difficulties in attributing a monetary value to items for which no market exists, and the fact that non-monetizable effects (e.g. certain social impacts) cannot enter the calculation.

In addition to primary and secondary data, the CBA requires setting a series of analytical assumptions e.g. on the future market acceptance of VSME. CBA results may be sensitive to these assumptions, up to the extreme case in which, under certain assumptions, the net benefits may vary from positive to negative or visa. To verify whether results are robust, a **sensitivity analysis** will be performed. The sensitivity analysis consists of the following steps: (i) identification of the variables with the expected largest impacts on final results; (ii) identification of scenarios leading to alternative values for these impacts; and (iii) re-calculation of results based on selected alternative scenarios.

[66] The methodology is in line with the European Commission's Better Regulation Toolbox, Tool #55.

Based on the list of benefits and costs discussed above and on the previous analysis[67], not all impacts will be quantified, as some of them are of a qualitative and subjective nature. Thus, the final approach will consist in a partial, or soft, CBA. In a partial CBA, most costs and benefits are monetised, and the net benefits are calculated.

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[67] CEPS and Mileu for EFRAG (2022), Cost-benefit analysis of the First Set of draft European Sustainability Reporting Standards, Brussels, 22 November 2022; and Commission Staff Working Document Impact Assessment Accompanying the document Proposal for a Directive of the European Parliament and of the Council amending Directive 2013/34/EU, Directive 2004/109/EC, Directive 2006/43/EC and Regulation (EU) No 537/2014, as regards corporate sustainability reporting, SWD/2021/150 final; and CEPS for DG FISMA (2020) Study on the Non-Financial Reporting Directive, ISBN 978-92-76-18196-5 doi: 10.2874/229601 EV-02-20-277-EN-N

6 COSTS AND BENEFITS FOR SMEs

This section presents the estimation of the costs and benefits generated by the application of the VSME. Based on the assessment of the population of SMEs that voluntarily implement these standards, the costs and benefits for spontaneous preparers and preparers upon request are analysed separately in sections 6.1 and 6.2.

6.1 Spontaneous preparers

Spontaneous preparers are those SMEs which decide to use the VSME not upon request of third parties (banks, larger customers), but for their own business reasons. Their choice is 'purely' voluntary, and this means that they expect to receive net benefits from their decision. In any case, no incremental regulatory costs can be attributed to voluntary decisions.[68]

As mentioned above, companies that are likely to reap the largest benefits from voluntary disclosures are those that operate in green markets (public or private), that need to build a stronger brand with consumers, or that sell products centred on sustainability (e.g. advanced manufacturing). In addition, some companies pay special attention to sustainability for business reasons (e.g. B-Corps). For these companies, the VSME is likely to represent a net benefit. Hence, they are likely to be among the early adopters.

Metanalyses have been carried out on the benefits of ESG reporting, with the main quantifiable effects being related to the capital markets, through greater liquidity, lower costs and better resource allocation[69]. Concurrently, other positive effects have also been reported on SME preparers concerning the transparency and acceptability of their operations. This enhances their reputation and brand image, and thereby increases their competitiveness in the business environment. In general, however, research[70] on the specific effects of ESG reporting on SMEs is lacking for the very simple reason that SMEs have not often engaged in ESG reporting yet[71] and this literature is only slowly emerging. This section will summarize the main findings from the targeted consultation and the literature review as regards: (i) competitiveness; (ii) management, reputation and improved internal organisation; and (iii) increased transparency and accountability.

- **Competitiveness**

A company's financial results and competitive position are influenced by manifold factors. Neither ESG reporting nor a better ESG performance possibly triggered by reporting will per se translate into stronger financial outcomes and a better competitive position. Nonetheless, empirical evidence is gradually emerging of a correlation between ESG disclosure and competitiveness, at least with reference to specific ESG factors[72].

Various stakeholders agreed that SMEs that will start engaging in ESG reporting might also reap various benefits for their businesses. These benefits include **a stronger competitive position and an enhanced reputation among consumers,** which can be conducive to higher sales. These benefits are more likely to occur in B2C industries and for companies with a well-established brand, because by transparently reporting on their sustainability efforts and social impact SMEs can differentiate from competitors. ESG reporting is then considered a necessary condition to access green procurement and increasingly perceived as a requirement to apply for Government grants particularly in the field of manufacturing.

[68] Cf. Better Regulation Toolbox, Tool#58 EU Standard Cost Model. It remains possible to estimate the costs associated to voluntary actions linked to the regulatory framework, such as a voluntary standards, but those cannot be considered administrative or regulatory costs.

[69] Christensen, H. B., Hail, L., & Leuz, C. (2021). Mandatory CSR and sustainability reporting: economic analysis and literature review. Review of Accounting Studies, 26(3), 1176 1248

[70] Trautwein, C. (2021). Sustainability impact assessment of start-ups–Key insights on relevant assessment challenges and approaches based on an inclusive, systematic literature review. Journal of Cleaner Production, 281, 125330.

[71] Shields, J., & Shelleman, J. M. (2015). Integrating sustainability into SME strategy. Journal of Small Business Strategy, 25(2), 59-78.

[72] For instance Ecovadis has recently investigated together with Bain the correlation between certain disclosures and value creation at least in a sample of their reporting companies. Bain - EcoVadis Joint Study: Do ESG Efforts Create Value?, 2024.

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A strong ESG focus can also help building a positive brand reputation, attract socially conscious consumers and foster customer loyalty. Benefits in B2B industries are more indirect and related to the supply chain effects discussed above in Section 5.3. They can be better framed in terms of maintaining, rather than winning, market shares. Company owners interested in facilitating the generational shift could be particularly motivated to engage in reporting.

On the more negative side, some participants to the targeted consultation highlighted that SMEs, that typically operate on very thin competitive advantages, might be particularly exposed to the risk that disclosures affect their competitive position vis-à-vis non-preparers. This may be due, on the one hand, to the reporting costs incurred and, on the other, to the negative effects of increased transparency, which may expose some of the companies' competitive advantages (e.g. a very high energy efficiency). These risks might ultimately discourage the uptake of the VSME, irrespective of any provision EFRAG might include on the confidentiality of commercially sensitive information.

As for the cost impacts, the estimates provided above show that the costs are too limited to significantly affect the cost structure of SMEs and their competitiveness vis-à-vis non-preparers. For smaller preparers (micro and small enterprises up to 20 employees), the VSME Basic Module would cost a few thousand EUR per year; while not negligible, this amount is unlikely to represent a significant share of total costs. For larger preparers (small enterprises with 20 employees or more and medium ones), costs are higher (up to EUR 20,000 for the full VSME), as they grow less than proportionately compared to the company's size.

As for the risk of disclosure, this concern also emerges from the literature.[73] Conditions were analysed where disclosing information on market-specific supply and demand conditions can create competitive disadvantages for preparers over potential market entrants. This was found of particular concern to smaller preparers, which are not familiar with disclosing information in general. In the financial reporting literature[74], the risk that the disclosure of information poses to competitive advantages has been used in many cases as the rationale for non-disclosure.

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- **Management, reputation and improved internal organization**

Reporting encourages SMEs to assess their ESG performance, leading to better management practices. ESG reporting provides the company's decision-makers with valuable data and insights that can inform strategic planning and decision-making processes. By analysing ESG metrics and performance indicators, companies can identify opportunities to optimize resource allocation, mitigate risks, and capitalize on emerging trends related to sustainability and social responsibility. By identifying areas for improvement in these domains, SMEs can implement more sustainable and responsible business strategies. This includes actions such as reducing waste and energy consumption, improving labour practices and enhancing corporate governance structures.

One of the most relevant benefits from engaging in ESG reporting on which interviewees generally concurred is the increased awareness of ESG aspects, a better understanding of the related risks and their incorporation into the decision-making process. By disclosing information about potential risks, such as supply chain disruptions, regulatory non-compliance or reputational damage, SMEs can demonstrate their understanding of the subject and a likely commitment to a proactive ESG risk management. This result is enhanced by the involvement of the SME owners/top management into the disclosure process, which translates into stronger engagement and propensity to act. This is one of the reasons why stakeholders reported that in France banks are finding increasingly effective to accompany their requests for ESG information with face-to-face interviews with the top SME decision-makers.

Finally in terms of positive impacts on internal organisation, smaller preparers are often not sufficiently structured to benefit from them, but the larger can experience better intra-company cooperation, as a result of the horizontal nature of some of these disclosures, forcing internal cooperation in data gathering and analysis.

[73] Breuer, M. (2021), 'How Does Financial-Reporting Regulation Affect Industry-Wide Resource Allocation?', Journal of Accounting Research, 59(1), pp. 59–110, https://doi.org/10.1111/1475- 679X.12345.
[74] Allen, A., Lewis-Western, M. and Valentine, K. (2022), 'The Innovation and Reporting Consequences of Financial Regulation for Young Life-Cycle Firms', Journal of Accounting Research, 60(1), 45–95, https://doi.org/10.1111/1475-679X.12398.

Sustainability reporting increases the transparency to SME employees and contributes to build a better perception of the SME reputation among them, which can lead to greater employee satisfaction. It has been reported during the targeted consultation that, in many labour markets, particularly those where labour shortage is becoming evident and filling job positions has become increasingly difficult, ESG reporting is increasingly becoming a tool to attract and retain talent particularly among the younger generations.

ESG reporting also fosters a sense of purpose and meaning among newly hired employees in particular. When employees understand how their daily activities contribute to positive outcomes in areas such as sustainability, community engagement, and ethical business practices, they are more likely to feel motivated and engaged in their roles. Hence, young candidates are more likely to be attracted to and remain with organizations that demonstrate a commitment to ethical behaviour, employee well-being, and environmental stewardship. This can lead to lower turnover rates and higher levels of employee satisfaction and loyalty. When employees feel that their contributions are valued and aligned with the organization's values and mission, they are more likely to feel a sense of belonging and commitment to the company.

- **Increased transparency and accountability**

By providing detailed and standardized reports on the ESG aspects of their operations, businesses become more transparent about their activities, policies, and performance. Adhering to a harmonized ESG standard endorsed at the EU level could further enhance an SME's credibility among stakeholders and community members. By promoting and utilizing standardized SME ESG reports, NGOs can enhance their effectiveness in driving corporate responsibility, sustainability, and positive social change. Data-driven advocacy can be more persuasive and lead to more effective environmental and social policies. Standardized ESG reporting can enhance the credibility of corporate social responsibility initiatives undertaken by SMEs. NGOs can support and publicize these initiatives, helping SMEs gain recognition for their efforts.

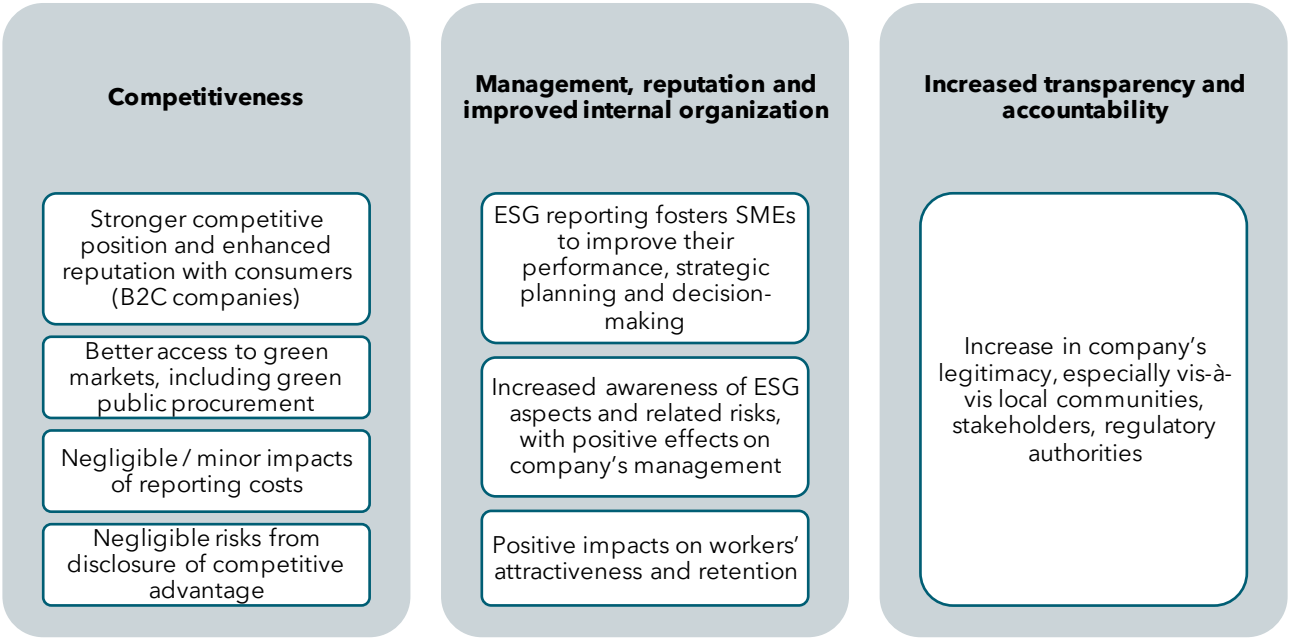
NGOs are particularly keen on having standardized ESG reports from SMEs for a combination of different reason. First, this is believed to promote comparability and benchmarking and results in increased transparency and accountability. Standardized reports would allow NGOs to better compare ESG performance across different companies and industries more effectively. This comparability would help in identifying best practices and areas that need improvement, facilitating more informed advocacy and policy recommendations. With standardized reports, NGOs can also track the progress of SMEs over time. This long-term view would aid them in assessing the impact of policies, programs, and interventions designed to improve ESG performance. Then standardized ESG reports make it easier for NGOs to access consistent and reliable data, thereby promoting corporate transparency. By means of standardization, NGOs can monitor compliance with regulatory frameworks, voluntary commitments, and international standards more efficiently, promoting better corporate behaviour.

This transparency enables the public to better understand how companies operate and the impact they have on society and the environment. Some professionals have remarked that, at least in certain national contexts, one of the main perceived benefits for SMEs from engaging in ESG reporting is represented by the ensuing improvement in the undertaking's perceived legitimacy. By transparently disclosing information about their social and environmental performance, SMEs can demonstrate their commitment to responsible business practices and accountability to local stakeholders. This can help prevent or mitigate conflicts with community members, regulatory authorities, and other stakeholders' groups, ensuring the long-term sustainability of SME operations.

ESG reporting can demonstrate SME commitment to supporting local communities, over and above their more traditional contribution to economic growth and job creation or to sourcing goods and services from local suppliers and investing in local infrastructure and facilities. ESG reporting can better frame these contributions, showcasing SMEs' role in minimizing their environmental impact, with related benefits for local ecosystems and natural resources. By disclosing information about their efforts to reduce emissions, waste and water consumption, and mitigate pollution, SMEs demonstrate their commitment to environmental stewardship and sustainability, contributing to the health and resilience of local environments. Finally, ESG reporting promotes social inclusion and diversity within SMEs and their surrounding communities. By disclosing information about their efforts to promote diversity, equity, and inclusion in the workplace, SMEs demonstrate their commitment to equity and inclusivity, although it is acknowledged that family businesses have more constraints in this. By disclosing information about their efforts to provide safe working conditions, promote employee wellness, and minimize environmental

hazards, SMEs contribute to healthier and more resilient communities. Table 10 below summarises the analysis of these benefits.

Table 10. Voluntary preparers: benefits



6.2 Preparers upon request

Preparers upon request are defined as those SMEs that engage into ESG disclosures not because of a spontaneous business-motivated decision, but in response to a demand for ESG information originating from within their value chain or financial institutions (in particular, for SMEs, banks). Since these requests are, in turn, often motivated by regulatory requirements on the originators themselves (compliance with CSRD disclosures with a value-chain dimension or SFDR and Pillar 3 reporting requirements on investee/financed companies), these are assimilated to regulatory costs for SMEs, from a methodological perspective.

For the analysis of the costs and benefits on preparers upon request, the following approach is adopted:

1. The **baseline costs** for handling ESG requests and providing ESG information in the baseline scenario (without VSMEs) are quantified;
2. The **incremental costs** of VSME are measured by quantifying its reporting costs and subtracting the costs borne by SMEs in the baseline scenario;
3. **Benefits** for VSME preparers (financial benefits, value chain participation) are quantified;
4. The **net impacts** are calculated via the cost-benefit analysis (CBA); and

Since ESG reporting is a fast-moving area, and the current baseline cannot be assumed to represent the baseline without the VSME in the future **additional considerations and scenarios** then complement the analysis of net impacts.

6.2.1 Baseline costs

The baseline costs are determined by the administrative costs for SMEs to handle requests from customers and financial institutions. These are in turn determined by: (i) the share of SMEs received those requests; (ii) the number of requests for each SME; and (iii) the cost of those requests.

These parameters were investigated via the SME survey. In 2023, about, respectively, one third and half of small and medium companies received a request from customers or financial institutions. In the vast majority of cases, they received only a request per year, from their major customer or financial counterpart. The share was much lower for micro companies, with only 8.5% of them receiving any request. The costs

for handling these requests varied from EUR 2,100 for micro companies to EUR 7,100 for medium ones; these costs consisted mostly of internal (i.e. personnel's costs), with a limited number of SMEs using consultants or online platforms. For companies receiving multiple requests, the costs add up (except when requests often concern similar information).

Findings are shown in Table 11 below. As it can be seen costs are relatively limited as in most cases these requests were received in a very simple questionnaire format and did not require major quantification efforts or narrative disclosures, which also explains the limited recourse to external support reported by survey respondents. The data from the SME survey, however, represents a picture of the situation in 2023 and does not distinguish between requests originated from compliance with SFDR or Pillar 3 requirements, national legislation or compliance with quality schemes/contractual obligations. Requests stemming from compliance with ESRS Set 1 requirements, for instance, are unlikely to be factored in to any significant degree in these figures, as the ESRS Set 1 standard was released after the survey was carried out. In this regard, any comparison with the SME survey baseline can provide a first good approximation of the additional regulatory costs triggered by the CSRD on SMEs, but it is unlikely to provide an up-to-date representation of the number of SMEs concerned.

Table 11. Baseline scenario – number and costs of ESG requests

Size	Share of companies receiving ESG requests (2023)	Cost per request (€/request)
Micro	8.5%	2,100
Small	31.1%	4,700
Medium	43.4%	7,100
SME Population	9.9%	

Source: SME Survey

For the above reasons, **the number of requests percolating on SMEs is expected to grow significantly in the following years,** in particular due to the progressive implementation of the CSRD and of the Pillar 3 reporting obligations for banks that the ECB has found to be poorly complied with until recently[75]. By 2028, this scenario considers an increase by about three times for micro companies, while nearly all small and medium enterprises will receive such a request. The share of companies receiving multiple requests is also expected to increase exponentially, doubling every year. Based on this scenario and a reasonable evolution from the situation emerging from the SME survey, it is expected that, by 2028, about 26% of SMEs will receive an ESG request, and 14% of those will receive more than one. This comes close to the maximum potential population, which is given by the sum of SMEs applying for a loan (20%) and participating in value chain with large customers (12%), while accounting for an overlap between the two populations.

Figure 6. Baseline scenario – estimated growth of ESG requests to SMEs (2028)



Source: Authors' elaboration

Based on these parameters, **the costs for handling ESG requests in the baseline scenario** (i.e. without VSMEs and with the limitations explained above) **are estimated at about EUR 12 billion in 2025, more than doubling to EUR 27 billion in 2028** because of the increased number of companies affected and the increased likelihood of receiving multiple requests. The two components and the trend are shown respectively in Table 12 and Figure 7 overleaf.

[75] ECB The importance of being transparent. A review of climate-related and environmental risks disclosures practices and trends. Results of the 2022 supervisory assessment of institutions' climate-related and environmental risks disclosures, April 2023. See also PWC Germany Zwischen Transparenz und Nachhaltigkeit Die ESG Säule III Offenlegungsstudie Offenlegung von ESG-Risiken gemäß Artikel 449a CRR, September 2023

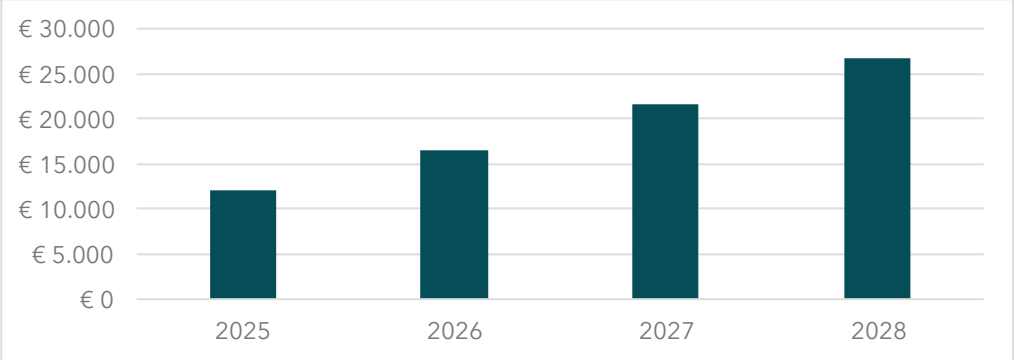
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Table 12. Baseline scenario – Total costs EUR million

	2025	2026	2027	2028
Costs of handling ESG requests	11,400	15,100	18,800	22,500
Micro	7,300	9,700	12,100	14,500
Small	3,100	4,100	5,200	6,200
Medium	1,000	1,300	1,500	1,700
Costs of handling multiple ESG requests	700	1,400	2,900	4,300
Total costs - Baseline scenario	**12,100**	**16,500**	**21,600**	**26,800**

Source: Authors' own elaboration

Figure 7. Baseline scenario – Total costs (trend in EUR million)



Source: Authors' own elaboration

6.2.2 *Incremental costs of VSME*

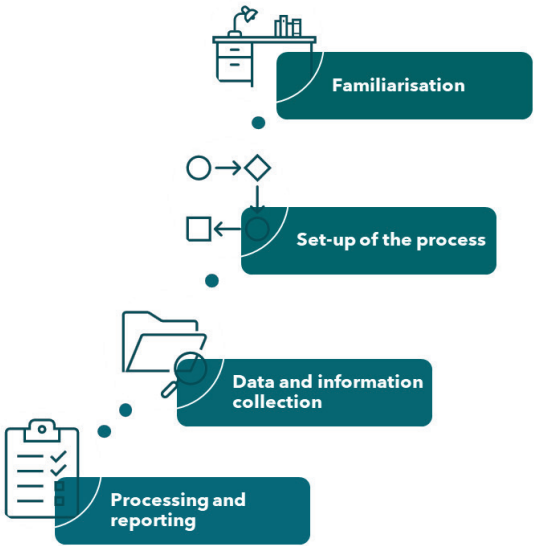
In this sub-section, **the incremental costs and burdens generated by the Information Obligation (IO) "drafting the ESRS sustainability statements according to the VSME standards" are calculated.**

- **Mapping the administrative activities**

The administrative activities required to comply with this IO can be described as follows:

1. **Familiarisation** with the applicable legal framework, that is the CSRD, the VSME and its scope, components and disclosures.
2. **Set-up of the process.** The requirements of the VSME must be matched with the reporting company and its activities. The company needs to decide which modules are to be compiled and, within each module, the applicable disclosure requirements. The company needs to decide whether and to what extent carry out the activity internally, hire an external consultant, entrust its accountant, or use an IT solution. In-house activities need to be allocated to the various people and functions. Internal sources of data should be mapped, gaps identified.
3. **Data and information collection.** Preparers have to collect the data and information requested to prepare the statements, in the format and based on the metrics required. Data and information will be partly available to the preparer; in part, new data and information will have collected and produced.
4. **Processing and reporting.** Once all the necessary data and information are prepared, these need to be processed and analysed to produce the VSME sustainability statements.

Figure 8. VSME administrative activities



Source: Authors' own elaboration

➢ **Segmentation**

While the various activities are the same for all SMEs using the VSME, the process is likely to be different for smaller and preparers. Based on the qualitative elements emerging during the targeted consultation, two groups of companies can be distinguished[76]:

- **Smaller preparers**: micro companies and small companies with up to 20 employees. These entities often lack internal people dealing with sustainability matter and have a higher tendency to outsource the work to their accountant or may resort to platform solutions. They are more likely to use the basic module only (about 70%) and tend to prefer simpler but cheaper compliance solutions, having a limited budget available.
- **Larger preparers**: small companies with 20 employees or more and medium companies. These entities may already have people and functions which, at least on a part-time basis, deal with ESG matters and related certification issues, which means they are more likely to use internal resources. In terms of outsourcing, they may prefer to resort to more expensive specialised ESG consultants – as opposed as to accountants and platform solutions. They are more likely to use the comprehensive module too (about 70%).

➢ **In-house vs. outsourcing**

Based on the findings from the targeted consultation, it is assumed a scenario where **only a minority (at most 10% of larger preparers) will carry out this process wholly or mostly internally,** at least in the first year; only larger preparers that are already structured in terms of sustainability reporting requirements may be able to familiarise with the standard and set-up the internal process required.

Most of the smaller preparers will, at least in the first place, ask the support of their accountants; a minority of them will use online platforms, either spontaneously or based on the indications of banks and suppliers. Following the revision of the ED and the simplification and streamlining of the text, it is considered that the final version of the VSME is conducive to a wider usage of online solutions, which are typically cheaper.

As for larger preparers, they may outsource to specialised ESG consultants but most of them, especially small companies, may still resort to their accountants our use online platforms. The share of larger preparers which are expected to prepare the VSME report internally is expected to grow in the subsequent years. The parameters describing outsourcing and the modalities of compliance, based on the findings of the targeted consultation, are shown in Table 13 overleaf.

[76] These categories are not mentioned, used or referred in the VSME.

The decision to outsource the preparation of the VSME report is determined by two main drivers. First, stakeholders concur that, especially for micro enterprises but not only, **most SMEs would not have the expertise and resources to understand and manage the process internally** irrespective of the extent to which the language of the VSME standard is simplified and made accessible. However, this is not only a matter of simplification. **SMEs are likely to hire external support for ESG reporting and use their resources for their core activities**, as it is already the case for financial accounts, labour consultants, safety managers, etc. It is important to note that in this context, outsourcing does not mean that the SME needs not to spend internal resources on this activity: as a minimum, it should collect data for the accountant, consultant or online platform, and it should verify and review the analysis and the report.

Table 13. In-house and outsourcing

	Micro enterprises Small enterprises with less than 20 employees	Small enterprises with 20 employees or more Medium enterprises	
		First Year	Following years
Fully In-house	0%	10%	30%
Accountants	50%	22.5%	12.5%
ESG Consultants	0%	30%	17.5%
Online platform	50%	27.5%	40%

Source: Authors' elaboration on targeted consultation and field test

- **Set-up and recurring costs**

Reporting costs are higher in the first year, due to set-up and familiarization activities, and lower in the subsequent years, because of the reduction in the number of activities and learning economies. This is confirmed unanimously by all stakeholders that were able to provide consideration on the evolution of reporting costs, as well as from the participants to the field test. Estimates vary from a moderate reduction (around 20%) to a significant (around 50%) or very significant (more than 50%) one depending on a number of factors.

The reduction is however not homogenous across internal and external costs. Internal costs are estimated to decrease the most as there learning economies always apply, with the time required by internal resources expected to decrease by 50%. Costs of consultants and accountants are also likely to decrease by the same amount, based on the estimates provided by participants to the field test. As for platforms, their business model is often based on an annual subscription, which is expected to remain at the same (or similar) price level across time[77].

- **Cost parameters**

Table 14 and Table 15 overleaf present the cost parameters needed to quantify reporting costs. They are sourced and triangulated from both the targeted consultation and the field test results; cost estimates were provided both by SMEs and their associations, as well as by consultants, accountants and platforms. As prescribed by the SCM methodology, the costs for a normally efficient firm are estimated; this is done by considering the median or average cost, or range thereof; extreme values have been expunged from the analysis. This means that, for specific cases, costs borne by companies can be higher or lower than the standard parameters presented.

More in detail, Table 14 presents detailed cost estimates, including internal personnel time, for the basic module. Table 15 presents cost estimates for other costs, which are estimated based on the data collected on the business partner module included in the ED. For all cost parameters, recurring costs are estimated, to account for their decrease from the second year of adoption.

[77] This is confirmed in the field test, where IT costs show the least difference between first and subsequent years of implementation.

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Table 14. Cost parameters – Basic module

Basic module	Micro & Small (less than 20 employees)		Small (20 employees or more) & Medium	
	First year	Following years	First year	Following years
Accountants	1,000 - 2,000	500 – 1,000	3,000 - 6,000	1,500 -3000
Consultants	-	-	5,000 – 10,000	2,500 – 5,000
Platforms	300 - 600	600	1,000 - 3,500	1,000 - 3,500
Internal personnel - Outsourcing	10 days of a clerk, 5 days of a manager	5 days of a clerk, 2.5 days of a manager	15 days of a clerk, 10 days of a senior professional	7.5 days of a clerk, 5 days of a senior professional
	3,000 Range: 1,100 – 7,100	1,500 Range: 600 – 3,500	4,200 Range: 1,500 – 9,100	2,100 Range: 800 – 4,600
Internal personnel - In house	-	-	25 days of a clerk, 15 days of a senior professional	12.5 days of a clerk, 7.5 days of a senior professional
			6,800 Range: 2,500 - 14,400	3,400 Range: 1,200 – 7,200

Notes. Extreme values removed based on SCM methodology; figures rounded to the hundreds EUR. For internal personnel costs, the ranges are calculated based on the highest (LU) and lowest (BG) salaries; central estimates are calculate based on the average EU salaries for the professional figures identified. Source: targeted consultation, Field Test, Eurostat mean annual earnings by sex, age and occupation

Table 15. Other cost parameters

Other costs and fees	Additional costs	Notes
DRs from the PAT module included in the basic module after the revision	1,000	Includes both internal and external costs; 50% decrease in subsequent years. Only applies to larger preparers, due to the fact that the PAT DRs would not apply to most of micro and small companies.
Comprehensive module – Micro enterprises & Small enterprises with less than 20 employees	5,000	Includes both internal and external costs; 50% decrease in subsequent years.
Comprehensive module – Small enterprises with 20 employees or more and medium enterprises	10,000	

Source: Authors' elaboration on targeted consultation

- **Total Reporting Costs**

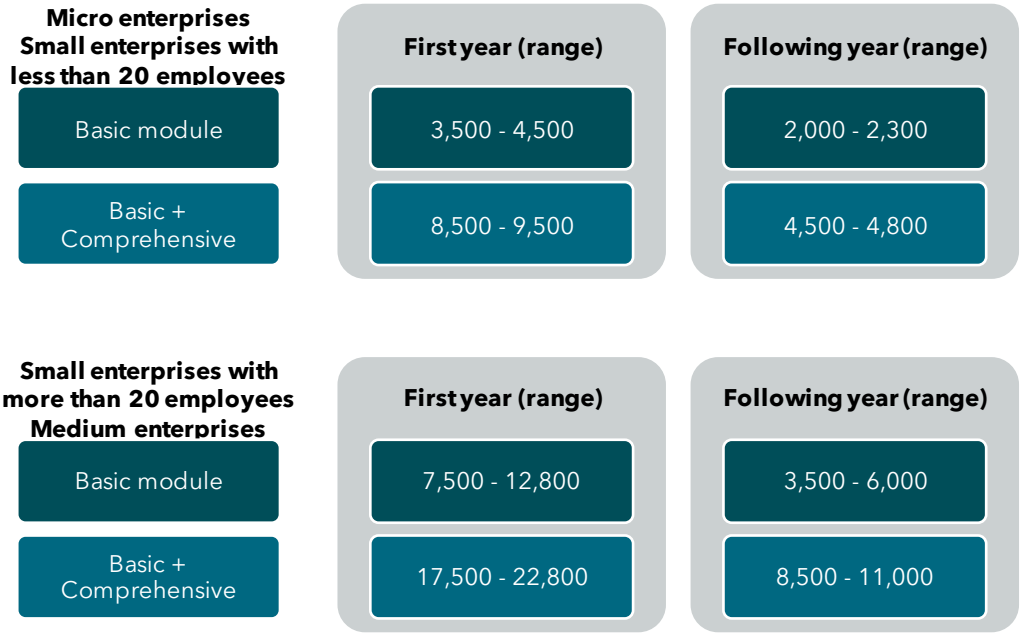
Based on the above analysis and parameters, the cost for the normally-efficient company can be calculated. These represent total reporting costs; incremental costs are calculated further below.

For the VSME reporting costs, several standard companies should be identified, over the following dimensions:

- Smaller vs. larger preparers;
- Compliance in-house vs. outsourcing;
- VSME module: basic only vs. basic + comprehensive.

Costs per companies are shown in below. In most cases, they are lower compared to the costs of the VSME ED, thanks to streamlining, simplification and a larger recourse to online compliance tools. The largest difference, up to more than 50% of reporting costs in the first year, concerns the submission of the VMSE, thanks to the removal of the DMA requirement.

Figure 9. Cost per company (EUR range)



Source: Targeted consultation, field test. Notes: figures are rounded to the hundred EUR; average is weighted by the share of population for the various modalities of compliance.

The estimates, based on the cost data provided during the field test and the targeted consultation, show that, for a smaller preparer, the total costs of the basic module are of about EUR 4,000 in the first year, and about half of it in the subsequent years. This results from about 15 days of internal work and some limited support by its accountants or an online platform. The costs about double for the comprehensive module.

For larger preparers, costs for the basic module fall in between EUR 7,500 and 13,000 EUR the first year, and slightly more than half of it in the subsequent years. Again, costs are about double when the comprehensive module is concerned, especially in the year of implementation.

These estimates are to be considered as an average cost for preparers, because the disclosures required, and hence the total cost of the VSME, will vary with the features of the reporting company. On one extreme, a company active in the services sector operating in an urban zone and with no employees (e.g. a retail shop) is likely to have to report very few disclosures, potentially only the introductory disclosure and scope 1 and scope 2 emissions. Its VSME costs would hence be smaller than what estimated above. At the opposite end, an SME active in an energy-intensive basic manufacturing industry (e.g. a small steel roll mill) is likely to have to report several more disclosures, and the costs reported above would be an underestimate. Importantly, preparers upon request include SMEs active in value chains with large customers, or demanding access to bank credit. This means that the population is less likely to include very small service companies, while it is more likely to include SMEs active in the manufacturing or construction sector, which will have to cover more disclosures.

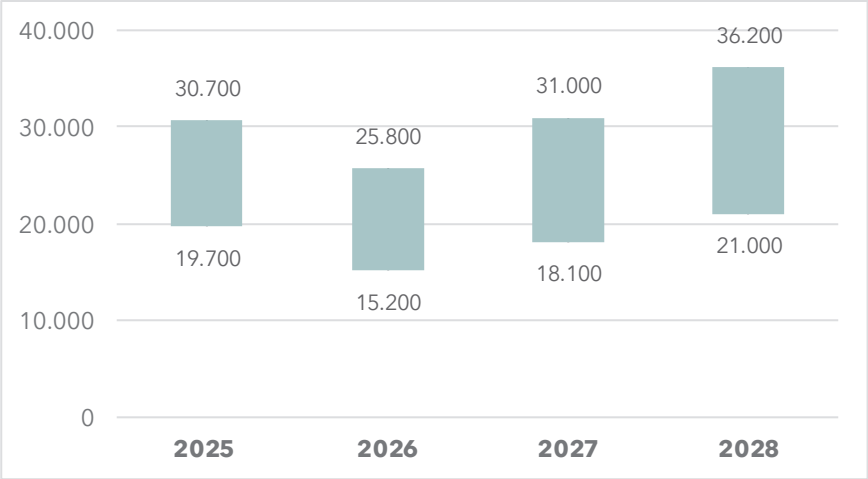
Total reporting costs are calculated by multiplying the costs per company shown above by the estimated number of companies adopting the VSME, as described in Section 5 above. Results are presented in range, to account for the uncertainty on the costs. Results are presented taking into account a progressive growth of the VSME population of preparers upon request; for any new company adopting the VSME, costs are higher in the first year of adoption and decrease in the following years.

Total reporting costs at EU level are estimated at 27.1 billion in 2025 (range: 19.7 – 30.7 billion). They decrease in the two following years and reach about EUR 31.8 billion (range: EUR 21 – 36.2 billion) in 2028, because of the growth in the number of adopters. While the number of VSME preparers

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doubles by 2028, the total reporting costs remain almost the same, because of the decrease in costs after the first year of adoption.

Figure 10. Reporting costs (EUR mn, range)



Source: Authors' own elaboration based on targeted consultation and field test

- **Incremental costs**

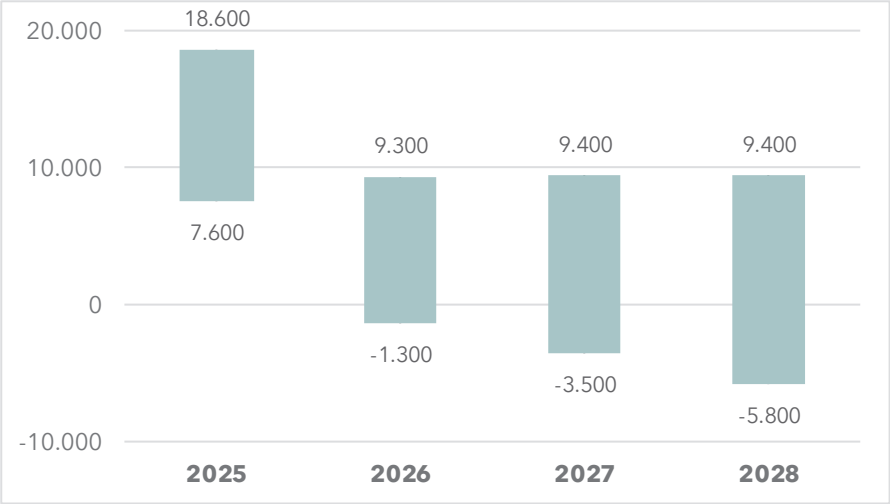
Incremental costs are the additional costs generated by the VSME as compared to the baseline scenario in which SMEs will have to reply to uncoordinated ESG requests from their large customers or financial institutions based on the same reporting standards as declared in the SME survey.

Incremental costs are very high in the year of first implementation of the VSME, because of its higher cost in the first year; they are estimated at about EUR 15 billion (range: EUR 7.6 – 18.6 billion). Then, they decrease for two reasons: on one side, costs per company decrease because of learning economies; on the other, the costs in the baseline scenario grow because more and more SMEs receive a request to disclose their ESG performance and information. In 2028, incremental costs decrease at about EUR 5 billion (range: EUR -5.8 – 9.4 billion). Estimates are shown in Figure 11 overleaf.

The incremental costs of the VSME compared to the baseline scenario are in line with the findings of the VSME. On the one side, the VSME has been carefully designed based on the requests from banks and large corporate customers; at the same time, by including data points requested in various questionnaires, in its entirety it is broader than most of the requests currently administered to SMEs. Moreover, and differently from typical ESG requests, the VSME is intended to be a basis for a full-fledged ESG report, rather than just providing answer to specific ESG questions. The difference between a report- and questionnaire-approach explains part of the additional costs, especially in the first year of implementation. However, the range of estimates for the last year includes negative results; this means that, depending on the actual costs of the VSME and the trends in ESG requests, the costs of uncoordinated replies can become higher than the cost of VSME, despite it being a more comprehensive tool.

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Figure 11. Incremental costs (EUR mn, range)



Source: Authors' own elaboration based on targeted consultation and field test

6.2.3 Benefits: financial and value chain participation

- **Financial benefits**

SMEs engaging in voluntary ESG disclosure can benefit from lower cost of and greater access to credit. As explained in Section 5.3 above, this may consist in a lower interest rate on bank lending, which is more pronounced in the case of concessional lending, and in increased opportunities to access sustainable lending. The former, the so-called greenium on lending, is measured as the cost differential between companies engaging or not engaging in ESG disclosure.

The findings from the targeted consultation suggest that these benefits, at the moment, are largely potential. Especially when it comes to the cost of bank lending, at the moment banks are not yet discriminating among clients that provide or do not provide ESG information or full disclosure. However, with the growing regulatory pressure, these benefits could materialize. For this reason, the assessment considers a conservative measure of the greenium (5, 10 and 25 basis points), which would correspond to more mature market situation and to a significant change of lending practices by banks. As for concessional lending, the greenium is more pronounced, and estimated in the range of 10 to 30 basis point. For access to credit, sustainable lending to SMEs is estimated in the range of 15 to 27 billion per year, and the potential increase in the range 10 to 20%; additional credit is converted into benefits by using an average ROI for EU SMEs (5.9%)

Based on those parameters, **financial benefits are limited, in line with the findings of the targeted consultation. They amount to about EUR 190 million in 2025 and grow to about EUR 580 million in 2028.** At the beginning, two thirds of the benefits result from the increased access to sustainable credit; over the period of the analysis, benefits from the cost of bank loans grow more than proportionally, reflecting the increase in the population of VSME preparers upon request.

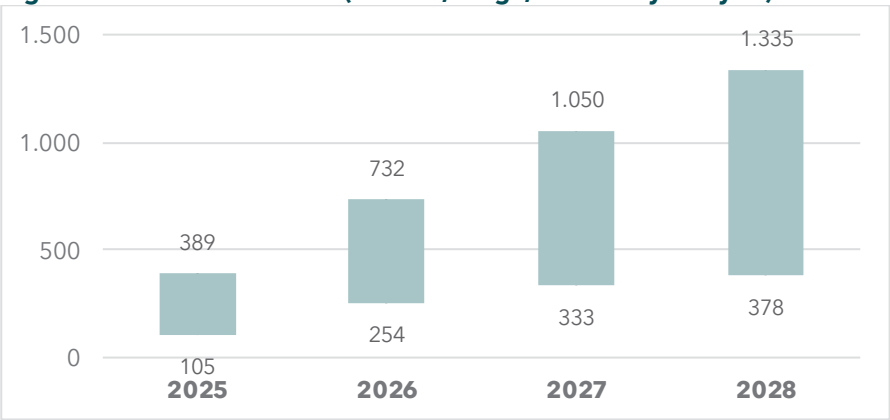
Table 16. Financial benefits (EUR mn, central value)

	2025	2026	2027	2028
Lower cost of bank loans	120	239	359	478
Lower cost of concessional loans	0.4	0.9	1.3	1.7
Benefits from access to credit	67	100	113	102
Total financial benefits	187	340	474	582

Source: Authors' own elaboration

Given the uncertainty on the amount of financial benefits, a sensitivity analysis is carried out on the estimated impacts on the cost of bank loans, of concessional loans, as well as on the increase in the access to credit. Results are shown in Figure 12 overleaf.

Figure 12. Financial benefits (EUR mn, range, sensitivity analysis)



Source: Authors' own elaboration

- **Value chain participation**

It is more and more likely that large corporations demand their supplies ESG data and disclosure, for their own business or marketing reasons, or to comply with the CSRD. Now, these requests concern a minority of SMEs, but the situation is evolving, mostly in respect to the implementation of the CSRD, which has just started. So far, most large companies have been focused on the DMA; when it comes to value chain data, these have been often estimated by means of secondary data and sector averages. However, in the future, they will have to resort more and more to primary information provided by suppliers. Hence, the provision of this information may become a criterion to direct purchase decisions.

At the moment, there is limited evidence that suppliers that do not provide ESG information face negative impacts, such as decrease in orders or expiration of contracts. One stakeholder mentioned that one larger retailer announced that, for its largest suppliers, the provision of certain ESG information may become a pre-requisite for supplies, but this is one of the few instances of actual negative impacts occurring so far. Also, suppliers are not all the same. Those providing standards or commoditised products and services may face a risk of downsizing or cutting commercial relationships. For key suppliers, those providing tailored or specialised inputs, or those operating in sectors at full capacity or with limited alternative suppliers, it remains unlikely that the threat of lower sales can materialise, at least in the medium term. This is particularly so also where alternative suppliers were not established in the EU, as this would likely cause additional difficulties in accessing ESG reporting data.

At the same time, it is reasonable to assume that **the increasing pressure on SMEs to disclose their ESG performance may benefit those that voluntarily decide to do so.** This effect is largely redistributive, with disclosing SMEs gaining some of the revenue lost by other businesses, and possibly, from the re-shoring of activities linked to the complexity of measuring impacts on an extended value chain. The analysis thus considers three scenarios: a central one in which sales by VSME preparers to large companies increase by 20%, with sensitivity analysis at 10% and 30%.

Based on this framework, the benefits from the value chain are calculated as follows:

- Total SME revenue in 2022 amounted to about EUR 19,000[78] billion; turnover from sales to large corporations were estimated at about EUR 2,300 billion (12%). Turnover by VSME preparers upon request is estimated based on their share of SME population;[79] it amounts to about EUR 300 billion in 2025, and it increases up to EUR 600 billion in 2028 (following the increase in the number of VSME preparers).
- The additional revenue is estimated in the three scenarios. In the central scenario, it goes from EUR 60 billion in 2025 (range EUR 30 – 90 billion) to EUR 120 billion in 2028 (range EUR 60 – 180 billion).

[78] Eurostat (2023) Structural Business Statistics, retrieved from https://ec.europa.eu/eurostat/web/structural-business-statistics/database

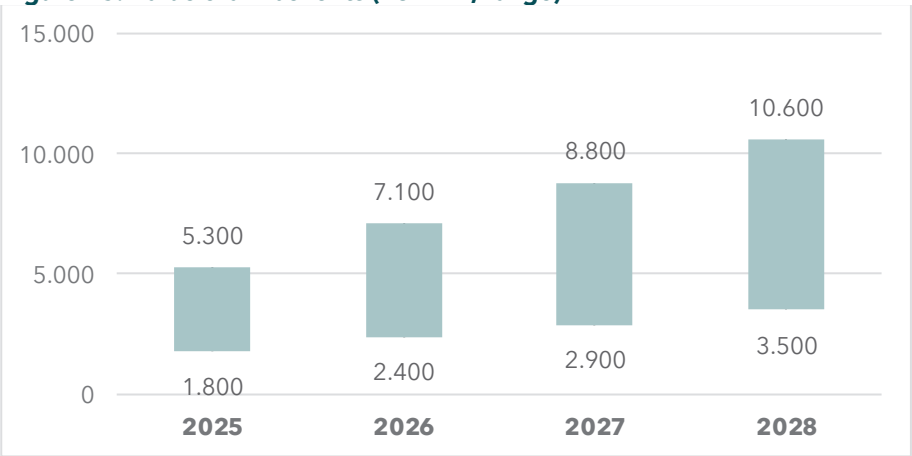
[79] In other words, it is assumed that, on average, there is no difference in sales to large companies among VSME preparers and other companies.

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- Additional revenues are converted into benefits (i.e. profits) using the average ROI for EU SMEs (5.9%).

Estimated benefits from value chain participation amount to about EUR 3.5 billion in 2025 (range EUR 1.8 – 5.3 billion); they grow to EUR 7.1 billion in 2028 (range EUR 3.5 – 10.6 billion). These are shown in Figure 13 below.

Figure 13. Value chain benefits (EUR mn, range)



Source: Authors' own elaboration

7 CONCLUSIONS: CBA OF VSME

The CBA reviews the costs borne by VSME preparers and compares them with the associated benefits. Some of these (financial benefits and benefits stemming from participation in the value chain) lend themselves to monetary quantification, while others, pertaining to broader competitive, managerial or reputational aspects, are dealt with in qualitative terms.

The population of likely VSME preparers is split into two groups:

- **Spontaneous preparers**. These are SMEs perceiving to receive a direct net benefit from issuing detailed and harmonized ESG statements based on the VSME. These are likely to be found among:
    - SMEs active in B2C 'green markets', with a value proposition targeted to environmentally-conscious consumers;
    - SMEs selling products and services centred on sustainability (e.g. advanced manufacturing, ESG-related services), including when active in B2B value-chains;
    - SMEs active on the green public procurement market;
    - SMEs with a special attention to ESG issues (e.g. B-corp).
- **Preparers upon request**. This group includes SMEs receiving requests to provide ESG information from the value chain or financial institutions. In this case, the adoption can be direct, when the SME is requested to provide a VSME statement, or indirect, when the SME is requested to provide ESG information and decides to use VSME statements to this purpose.

As for spontaneous preparers, the choice is 'purely' voluntary. This means that they perceive net benefits from their decision, with qualitative benefits representing the prevailing motivation. In any case, no incremental costs can be attributed to voluntary decisions.

For the analysis of the costs and benefits on preparers upon request, the following approach is adopted:

1. The baseline costs for handling ESG requests and providing ESG information in the baseline scenario (without the VSME) are quantified;
2. The incremental costs of the VSME are measured by quantifying its reporting costs and subtracting the costs borne by SMEs in the baseline scenario;
3. The benefits for VSME preparers (financial benefits and benefits from value chain participation) are quantified;
4. The net impacts are calculated via the CBA. Sensitivity analyses are performed to ensure the robustness of the result.[80]

The cost estimates for the VSME are based on the **targeted consultation with SMEs and their associations, consultants, accountants and platforms. These were triangulated with the results from the EFRAG field test**, that was run independently from the targeted consultation and led to comparable figures. As a result, the two exercises strongly confirm each other's reliability. The costs for a normally efficient firm were estimated using median or average costs, excluding extreme values. The estimates show that, for a smaller preparer (less than 20 employees), the total costs of the Basic Module amount on average to about **EUR 4,000 in the first year and about half in subsequent years**. This results from about 15 days of internal work and some limited support by the SME's accountants or an online platform. The costs for the full VSME, including the comprehensive module amount to about EUR 9,000 per year. For larger preparers (with 20 employees or more), the costs for the Basic Module amount to **between EUR 7,500 and 12,800** in the first year, and about half in subsequent years. Again, costs are higher (about EUR 20,000) when the comprehensive module is also prepared.

These estimates are to be considered as an average cost for preparers; costs for preparers will vary with the features of the reporting company. As preparers upon request include SMEs asking for a bank loan active in value chains with large customers, **they are less likely to include very small service companies**

[80] This involves identifying variables with the largest expected impacts, creating scenarios with alternative values for these impacts, and recalculating the results based on these scenarios. This step has been crucial for verifying and validating the reliability of the CBA findings under different assumptions.

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and more to include SMEs active in the manufacturing or construction sector, which will have to report more disclosures.

In the central scenario, incremental costs are expected to be higher than zero; in other words, the VSME is expected to cost more than ESG questionnaires currently in use. Though the VSME has been carefully designed based on the requests from banks and large corporate customers, including data points requested in various questionnaires, it is broader than most of the requests currently administered to SMEs. Moreover, and differently from typical ESG requests, the VSME is intended to be a basis for a full-fledged ESG report, rather than just providing answers to specific ESG questions. The difference between a report- and questionnaire-based approach explains part of the additional costs, especially in the first year of implementation.

More specifically, incremental costs peak in the year of first implementation of the VSME, because of its higher cost in the first year. Then, they decrease for two reasons, i.e. learning economies and the fact that the costs in the baseline scenario will grow, as more and more SMEs are expected to receive a request to disclose their ESG performance and information. In 2028, incremental costs have decreased at about EUR 5 billion (range: EUR -5.8 – 9.4 billion).

Moreover, there are signs that **ESG requests, particularly from banks, are becoming more complex and sometimes even more complex than the VSME**, and that banks may become more demanding in obtaining replies to their questionnaire. If this turns out to be true, in the future the costs under the baseline scenario will grow significantly and the incremental costs of the VSME will in turn become lower, possibly even negative (as shown by the negative range in 2028), i.e. the costs for handling ESG requests will become higher than the costs of reporting under the VSME.

To estimate the net impacts of the VSME, its incremental costs should be compared with quantifiable benefits:

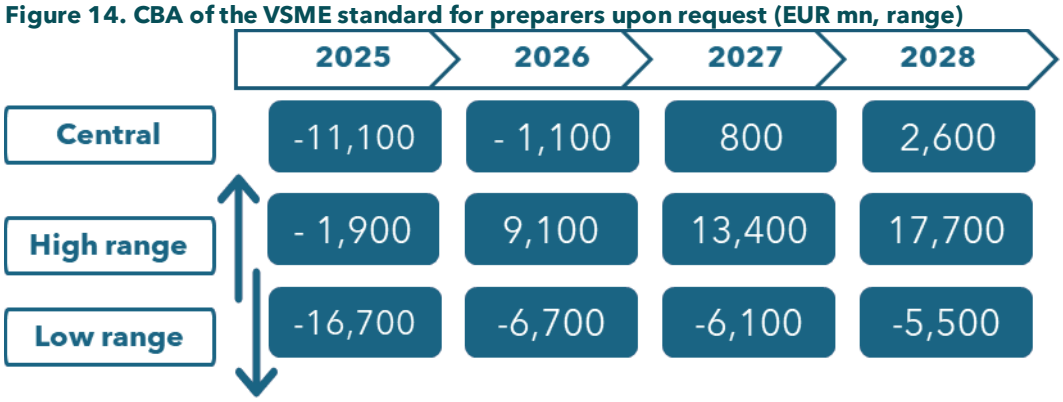
- Financial benefits are primarily estimated based on the relationship between the quality of ESG disclosure and the cost of debt. The analysis incorporates the concept of an 'ESG credit premium', which is quantified at 5 -10 – 25 bp and 10 and 30 bp for concessional lending. Based on those parameters, financial benefits are limited, in line with the feedback from the Targeted Consultation. **They amount to about EUR 100-390 million in 2025 and grow to about EUR 380-1,340 million in 2028**.
- The size of benefits from the value chain participation effects is measured via scenarios relying on national accounts data, which provide information on the supplies from SMEs to large corporations over total sales. The likelihood of these effects is determined based on assumptions about the reaction of large buyers. **Estimated benefits from value chain participation amount to about EUR 1.8-5.3 billion in 2025 and grow to EUR 3.5-10.6 billion in 2028.**

The net impacts for preparers upon request can be calculated as follows: **expected benefits (financial and value chain participation) minus incremental costs (given by the difference between VSME reporting costs and the baseline scenario).** The range for net impacts is shown in Figure 14 overleaf.

Net impacts are negative the first year, due to the implementation costs. In the central scenario, **net impacts become positive from 2027,** and even more so in 2028. The positive results are driven by the lower recurring reporting costs, as well as the increasing benefits. Net benefits amount to EUR 800 million in 2027 and reach EUR 2,600 million in 2028.

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Figure 14. CBA of the VSME standard for preparers upon request (EUR mn, range)



Source: Authors' own elaboration

Figure 15 shows the difference between the CBA of the VSME ED and its final version. The improvement is evident and significant, at about EUR 6.3 billion in the first year (when most of the one-off costs are borne), and about EUR 3 billion in the following years. The streamlining and simplification, the removal of the DMA, as well as the more fitness for use online platforms are instrumental in reducing reporting costs, while benefits remain largely unchanged.

Figure 15. VSME – Variation in net benefits between the ED and the final draft (EUR mn per year)



Source: Authors' own elaboration

7.1 Additional considerations and scenarios

As shown above, with assumptions based on the analysis of the current evidence and situation, the VSME already generates positive net impacts. This comes together with the expected net benefits for those VSME preparers which voluntarily opt for it for market and business considerations. In other words, **the CBA delivers a positive result.**

However, the field of ESG reporting and related consequences is evolving fast, for the evolution of the regulatory framework and its impact on business practices. Hence there are other scenarios, based on non-linear evolutions of the current situation, in which the impact of VSME would become significantly more positive. They are mostly linked to the behaviours of banks, which are considered a key transmission mechanism to nudge SMEs towards disclosing, and eventually improving, their ESG performance. These are presented separately from the above CBA, given the uncertainty associated with their occurrence; however, these far-reaching evolutions which have been mentioned by a significant group of stakeholders (although a minority thereof).

- **Credit curtailment.** Net impacts would become significantly positive in the scenario, mentioned by some financial institutions, of a significant curtailment or increase in the costs of credit for non-compliant SMEs. With an average loan of EUR 200,000, the opportunity cost of curtailed access to bank credit for an SME would be up to EUR 11,800 per preparer, higher than the average cost of the full VSME (basic + comprehensive). This scenario would be justified by the growing pressure on banks to provide data on environmental impacts to regulators. The likelihood and magnitude (in terms of market diffusion) of the risk of curtailment, however, remains unclear.
- **Complexification of requests beyond VSME requirements.** As mentioned before there are there are signs that ESG requests are becoming more complex, sometimes even more complex than the

VSME[81], and that banks may become more demanding in obtaining replies to their questionnaire because, under increasing pressure from supervision authorities. In other words, it can be expected that the VSME will become a module of a broader patterns of ESG requests to SME clients that are also likely to include taxonomy alignment data, particularly if a simplified version is devised for SMEs. In such a framework the benefits and the avoided costs above should be assessed against the entire costs of preparing ESG reporting for banks. This means that baseline costs would be significantly higher than what estimated above, and incremental costs would correspondingly decrease.

In addition to the costs and benefits quantified in the CBA, the Study Team's analysis and the various streams of consultation activities touched upon several additional topics:

1. Market acceptance of the VSME from the viewpoint of users' needs.
2. Market acceptance of the VSME from the viewpoint of preparers' needs

➢ **Acceptance of the VSME by Users**

The VSME pursues **multiple objectives**. It is designed to enable non-listed SMEs to respond to sustainability information requests from customers, banks, investors or other stakeholders, and thereby enabling synergies and cost savings. The VSME is also expected to make these users converge and limit data requests to SMEs to those included in the VSME standard. Finally, the Commission, in its September 2023 SME Relief Package, specifically refers to the VSME as a tool to support SME access to sustainable financing.

This presupposes that:

- a **minimum common denominator** is found among the information needs of users,
- the resulting standard is authoritative enough to **set a boundary for most of these requests**,
- the information contained therein is a sufficient tool to **help SMEs apply for green financing**.

The main users of the VSME will be, on the one hand, banks, which represent by far the most important source of financing for EU SMEs, and, on the other, large corporate customers. Their needs, however, may not be fully aligned.

- Banks' ESG requests to SMEs are mainly dictated by their own reporting requirements under Pillar 3, and this is even more so after the Capital Requirements Regulation (CRR#3)[82] was eventually released. These information needs only partly overlap with those of investment funds that are regulated by the SFDR PAI. If the purpose of the VSME is to help SME apply for green financing, **Pillar 3 reporting requirements should remain prominent,** as the importance of bank lending far outweighs that of SME access to the capital market across the EU.
- However, the VSME is also to ensure some degree of vertical coherence with the ESRS, because ESG requests along the value chain will be largely triggered by the need of large companies to comply with the CSRD. Similarly, the VSME may have to include some of the requirements trickling down from the SFDR PAI, as part of the information may be requested to invested companies, and hence to their suppliers.

The two objectives may be conflicting and the VSME could run two risks:

- If too close to banks' needs, it may result into a leaner, simpler instrument; however, as argued by some stakeholders, it may fall short of the needs of large customers, especially in sectors which have specific disclosure needs (e.g. fashion, luxury). Hence, the VSME may need to be complemented by sector-specific disclosures.

[81] It was anecdotally reported the case of a medium-sized SME that to get a € 1 mn green loan in an ESG critical sector had to fill in a questionnaire considerably more complex than the VSME in the opinion of the accountant who assisted in its preparation. The loan was conditional on having the questionnaire filled in and validated.

[82] Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 Text with EEA relevance

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- If it incorporates the needs of both banks and large customers, it may result into an instrument which is comprehensive but, at the same time, more complex, with higher costs and potentially a lower uptake.

Given this context and considering that the value chain cap for corporate requests is determined only by the LSME, the VSME has possibly achieved one of the best possible results in attempting to limit the potential information requests to SMEs from ESRS preparers and investors' reporting under the SFDR. However, **the VSME capacity to set a boundary on information requests from banks is more uncertain.** It will ultimately depend on some factors which are still unknown, including the final format of EBA guidelines on managing ESG risks, the discussions on the Banking Book Taxonomy Alignment Ratio (BTAR) and the possibility of having a simplified version of the EU Taxonomy for SMEs. As importantly, or possibly even more so, the extent to which concessional lenders (e.g. EIF, EIB, KFW, SACE) will align their own information requests to intermediary banks to what is included in the VSME. The VSME in its current draft format will therefore be launched in a context in which:

- **It is likely to meet the data requirements of both banks and corporates**, but not exhaustively. The rationale behind the basic module is to make it friendly to micro companies and maximise uptake; however, it may not be sufficient for accessing bank credit. To access related benefits, a share of SMEs will have to us the comprehensive module as well.
- The VSME as such **may not allow preparers to meet Pillar 3 information requirements in full, notably taxonomy alignment disclosure, but most related datapoints are already covered**.
- The VSME is less likely to meet information requirements of large corporations. However, a strategy to overcome the issue could be to deal with sector-specific requests via sectoral standards.

As for other considerations, it was anecdotally reported that **some large multinationals might be reluctant to accept the VSME as a valid non-financial disclosure document to be used as basis to meet CSRD requirements if simply endorsed by means of a Commission Recommendation.** This is believed to justify requests not to abandon current data gathering practices accepted by auditors. Importantly, however, the only SME standard to have a clear legal endorsement by means of a delegated act will remain the LSME. In any case, since the consideration was based on hearsay, drawing conclusions about how representative this apparently very cautious attitude might be is difficult. It still may be an extreme position bound to disappear as the VSME gets increasingly acknowledged and accepted by the market.

Finally, and importantly, prospective users are uncertain as to the modalities in which VSME reports will be made available. **Whether they will be published in the European Single Access Point (ESAP) or not remains unclear. As mentioned before, this is deemed to be one of the key factors influencing the degree of market uptake of the VSME**, because users will be greatly encouraged by its availability in a common processable format at little or no cost. This is seen as one of the big competitive advantages of the VSME as compared to other in-house or platform-based solutions. Similar considerations apply to the availability of the VSME in national databases and company registers.

➢ **Acceptance of the VSME by preparers**

The VSME is considered as a **relatively simple tool by most users**, striking a positive balance between complexity, comprehensiveness and most of the needs of the stakeholders. However, **most SMEs will still be likely to need or prefer to get external support for preparation**. This is for various reasons:

- Most SMEs have very little familiarity with ESG topics. This means that they would need to spend a significant amount of time to familiarise with the standard;
- Albeit very simplified compared to the ESRS, the standard is considered complex and technical by some stakeholders, as not all disclosures are immediately understandable in their technicalities (e.g. the disclosures on biodiversity and water).
- Few disclosures remain open-ended. SMEs are typically used to structured questionnaires, mostly consisting of closed numerical questions. Open-ended questions may also be more difficult to process by users. This aspect was thoroughly addressed by the final revision of the VSME.
- Even when SMEs can prepare the report internally, they may prefer to focus on their core activities and hire to this purpose a third party (e.g. their accountant), who is already familiar with company

data. Also, small SMEs may lack internal resources for this job and could need external support regardless of the complexity of the standard.

The targeted consultation confirmed that propensity to delegate ESG reporting preparation is already quite widespread. **No further simplification of the VSME is likely to change this situation**. The above implies that any massive and rapid uptake of the VSME as an ESG reporting standard will face major bottlenecks in the **availability of supporting expertise** in the market. Given the difficulties which most SMEs are likely to experience in preparing the statement internally, the availability of a sufficiently large number of trained accountants - as consultants appear likely to cater to the more lucrative market of larger corporations - will be a key adoption factor. Therefore, a major element influencing the VSME uptake and market acceptance will also be the amount of training provided to SME accountants, the majority of whom reportedly still lack familiarity with ESG concepts and reporting frameworks. In this regard, comments on the readiness to cope with the likely future demand were very diverse depending on the different national or regional contexts.

Moreover, it was reported that SMEs tend to have an understanding of **business confidentiality** that is very broad in scope and possibly goes beyond the relevant VSME clause. This clause allows undertakings to omit classified or sensitive information from their reports if the information has commercial value because it is secret and if its publication is likely to negatively affect the financial performance or position of the undertaking even for matters that might go beyond protection of intellectual property or innovation. It is generally estimated that these companies are unlikely to adopt the VSME in any format that would require publication but would only transmit related information to the relevant counterparts upon request and bound to confidentiality. This is particularly the case for SMEs which are not required to publish their financial accounts. The latter might be an obstacle also irrespective of preparers confidentiality concerns, as it is currently unclear how the VSME can be officially published if the main financial accounts are not[83].

Conversely, the interviews showed that in a number of Member States – particularly in Southern Europe - **requests to have the VSME verified or assured by third parties** may be frequent, either because of explicit demands coming from banks or because the ESG statements are "attracted" within the sphere of the assurance requirements envisaged for the financial accounts. In a similar vein, it was noted that, at least in some jurisdictions, this parallelism with the financial statements, and in particular the possibility of being published as an annex to the financial statements, might push the VSME - or at least its disclosures more directly related to financial materiality - towards the sphere of criminal responsibility for preparers, which might be a deterrent for them to publish the document.

Another challenge relates to the **Scope 1 and Scope 2 GHG emissions** reporting required by disclosure B3, as well as Scope 3 GHG emissions, that must be disclosed in specific circumstances. While Scope 1 and 2 can be tricky for SME preparers and would ideally require an official calculator to convert energy consumption values into GHG emissions Scope 3 information is included as an entity-specific consideration in VSME, and not as a mandatory disclosure; its calculation is indeed deemed very difficult for most SMEs in terms of availability of information and costs of carrying out a detailed analysis. Most VSME statements will not include Scope 3 emissions; however, the very fact that these are mentioned in the standard indicating that their disclosure is necessary in specific, though limited, circumstances risks creating unnecessary complexity and confusion on the subject.

Online platforms are likely to play a key role in facilitating the market uptake of the VSME, as they will account for a large share of VSME early users and key stakeholders, and even more so after the review and the simplifications introduced. The VSME will be used to simplify and harmonize their own data gathering process; even if a public repository is not made readily available, this might mean that VSME contents are integrated within their surveys and translated into a questionnaire format that can be relatively far from the original reporting standard. ESG reporting platforms that currently face challenges in integrating SME data from disparate sources, leading to data quality issues, inconsistencies and gaps in reporting, are certainly more at ease in implementing an even more simplified and checklist-type version of the VSME. Furthermore, users, particularly banks, might decide that increased recourse to platforms is more expedient than having a separate data collection process, as this might trigger substantial savings.

[83] Examples of these companies include *die offene Handelsgesellschaft* and *die Kommanditgesellschaft* in Germany, *societa in nome collettivo* and *società in accomandità semplice* in Italy and their corresponding entities in France, *półka akcyjna, spółka z ograniczoną odpowiedzialnością, spółka komandytowo-akcyjna* in Poland.

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EUROPÄISCHE
KOMMISSION

Brüssel, den 30.7.2025
C(2025) 4984 final

EMPFEHLUNG DER KOMMISSION

vom 30.7.2025

für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

Stand: 01.02.2026

„Empfehlung EU zur Anwendung VSME“ Empfehlung der Kommission vom 30.7.2025 für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen (C(2025) 4984 final (9 Seiten, pdf)

https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme_de.pdf

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vom 30.7.2025

für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

DIE EUROPÄISCHE KOMMISSION —

gestützt auf den Vertrag über die Arbeitsweise der Europäischen Union, insbesondere auf Artikel 292,

in Erwägung nachstehender Gründe:

(1) Die Richtlinie (EU) 2022/2464 des Europäischen Parlaments und des Rates[1] trat am 5. Januar 2023 in Kraft. Durch sie wurden die Richtlinien 2013/34/EU des Europäischen Parlaments und des Rates[2], 2004/109/EG des Europäischen Parlaments und des Rates[3], 2014/56/EU des Europäischen Parlaments und des Rates[4] sowie die Verordnung (EU) Nr. 537/2014 des Europäischen Parlaments und des Rates[5] geändert und dadurch die Nachhaltigkeitsberichterstattungspflichten von Unternehmen verstärkt und modernisiert.

(2) Die Richtlinie (EU) 2022/2464 ist ein wichtiges Element des europäischen Grünen Deals[6] und des Aktionsplans für ein nachhaltiges Finanzwesen[7]. Sie soll sicherstellen, dass die Anleger über die nötigen Informationen zum Verständnis und zur Steuerung der Risiken verfügen, denen die Unternehmen, in die investiert wird, durch den Klimawandel und andere Nachhaltigkeitsaspekte ausgesetzt sind. Sie soll ferner

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1 Richtlinie (EU) 2022/2464 des Europäischen Parlaments und des Rates vom 14. Dezember 2022 zur Änderung der Verordnung (EU) Nr. 537/2014 und der Richtlinien 2004/109/EG, 2006/43/EG und 2013/34/EU hinsichtlich der Nachhaltigkeitsberichterstattung von Unternehmen (ABl. L 322 vom 16.12.2022, S. 15, ELI: http://data.europa.eu/eli/dir/2022/2464/oj).

2 Richtlinie 2013/34/EU des Europäischen Parlaments und des Rates vom 26. Juni 2013 über den Jahresabschluss, den konsolidierten Abschluss und damit verbundene Berichte von Unternehmen bestimmter Rechtsformen und zur Änderung der Richtlinie 2006/43/EG des Europäischen Parlaments und des Rates und zur Aufhebung der Richtlinien 78/660/EWG und 83/349/EWG des Rates (ABl. L 182 vom 29.6.2013, S. 19, ELI: http://data.europa.eu/eli/dir/2013/34/oj).

3 Richtlinie 2004/109/EG des Europäischen Parlaments und des Rates vom 15. Dezember 2004 zur Harmonisierung der Transparenzanforderungen in Bezug auf Informationen über Emittenten, deren Wertpapiere zum Handel auf einem geregelten Markt zugelassen sind, und zur Änderung der Richtlinie 2001/34/EG (ABl. L 390 vom 31.12.2004, S. 38, ELI: http://data.europa.eu/eli/dir/2004/109/oj).

4 Richtlinie 2014/56/EU des Europäischen Parlaments und des Rates vom 16. April 2014 zur Änderung der Richtlinie 2006/43/EG über Abschlussprüfungen von Jahresabschlüssen und konsolidierten Abschlüssen (ABl. L 158 vom 27.5.2014, S. 196, ELI: http://data.europa.eu/eli/dir/2014/56/oj).

5 Verordnung (EU) Nr. 537/2014 des Europäischen Parlaments und des Rates vom 16. April 2014 über spezifische Anforderungen an die Abschlussprüfung bei Unternehmen von öffentlichem Interesse und zur Aufhebung des Beschlusses 2005/909/EG der Kommission (ABl. L 158 vom 27.5.2014, S. 77, ELI: http://data.europa.eu/eli/reg/2014/537/oj).

6 Mitteilung der Kommission an das Europäische Parlament, den Europäischen Rat, den Rat, den Europäischen Wirtschafts- und Sozialausschuss und den Ausschuss der Regionen – Der europäische Grüne Deal (COM(2019) 640 final).

7 Mitteilung der Kommission an das Europäische Parlament, den Europäischen Rat, den Rat, den Europäischen Wirtschafts- und Sozialausschuss und den Ausschuss der Regionen, Aktionsplan: Finanzierung nachhaltigen Wachstums (COM(2018) 97 final).

gewährleisten, dass Anleger und andere Interessenträger über die nötigen Informationen verfügen, um die Auswirkungen von Unternehmen auf Mensch und Umwelt beurteilen zu können.

(3) Nach der Richtlinie (EU) 2022/2464 müssen große Unternehmen, Mutterunternehmen einer großen Gruppe und Unternehmen, deren Wertpapiere zum Handel an einem geregelten Markt in der Union zugelassen sind (außer Kleinstunternehmen), gemäß den Standards für die Nachhaltigkeitsberichterstattung Angaben zur Nachhaltigkeit ihrer Tätigkeiten machen. Nach Artikel 29b dieser Richtlinie muss die Kommission solche Standards im Wege delegierter Rechtsakte erlassen und dabei die fachliche Stellungnahme der EFRAG berücksichtigen. Am 31. Juli 2023 hat die Kommission mit ihrer Delegierten Verordnung (EU) 2023/2772[8] den ersten Satz an Europäischen Standards für die Nachhaltigkeitsberichterstattung (ESRS) angenommen.

(4) Der Richtlinie (EU) 2022/2464 zufolge müssen kleine und mittlere Unternehmen, deren Wertpapiere zum Handel an einem geregelten Markt in der Union zugelassen sind (börsennotierte KMU) bei ihrer Berichterstattung nicht die gesamten ESRS zugrunde legen, sondern können einen gesonderten, weniger umfangreichen und verhältnismäßigeren Satz verwenden. Für kleine und mittlere Unternehmen, deren Wertpapiere nicht zum Handel an einem geregelten Martk in der EU zugelassen sind (nicht börsennotierte KMU), enthält diese Richtlinie keinerlei Verpflichtung zur Nachhaltigkeitsberichterstattung.

(5) Nach der Richtlinie (EU) 2022/2464 müssen Unternehmen, die zur Nachhaltigkeitsberichterstattung verpflichtet sind, Informationen zur Wertschöpfungskette insoweit melden, als diese für das Verständnis der nachhaltigkeitsbezogenen Auswirkungen, Risiken und Chancen ihrer Tätigkeiten erforderlich sind. Wenn nachhaltigkeitsberichtspflichtige Unternehmen zur Erfüllung der Anforderung, Angaben zur Wertschöpfungskette zu machen, bei den Unternehmen in ihrer Wertschöpfungskette Nachhaltigkeitsinformationen anfordern, kann dies zu einem „Trickle-down-Effekt“ führen. Für KMU in der Wertschöpfungskette größerer Unternehmen kann damit eine zusätzliche Belastung einhergehen, selbst wenn sie, wie bei nicht börsennotierten KMU der Fall, selbst nicht zur Nachhaltigkeitsberichterstattung verpflichtet sind. Ein Trickle-down-Effekt kann auch durch andere Faktoren als die Richtlinie (EU) 2022/2464 selbst verursacht werden. So fordern viele Unternehmen bei den Unternehmen in ihrer Wertschöpfungskette Nachhaltigkeitsinformationen z. B. deshalb an, um deren nachhaltigkeitsbezogene Risiken, Auswirkungen oder Chancen besser verstehen und steuern zu können oder um rechtliche Anforderungen zu erfüllen, die an anderen Stellen als in der Richtlinie (EU) 2022/2464 festgelegt sind, was u. a. auch die Sorgfaltspflichten von Unternehmen im Hinblick auf Nachhaltigkeit gemäß der Richtlinie (EU) 2024/1760 betrifft.

(6) Um den Trickle-down-Effekt auf KMU zu begrenzen, wird in der Richtlinie (EU) 2022/2464 eine sogenannte Obergrenze für die Wertschöpfungskette eingeführt, wonach die ESRS keine Berichtspflichten enthalten dürfen, die Unternehmen dazu zwingen würden, von den KMU in ihrer Wertschöpfungskette Informationen

[8] Delegierte Verordnung (EU) 2023/2772 der Kommission vom 31. Juli 2023 zur Ergänzung der Richtlinie 2013/34/EU des Europäischen Parlaments und des Rates durch Standards für die Nachhaltigkeitsberichterstattung (ABl. L, 2023/2772, 22.12.2023, ELI: http://data.europa.eu/eli/reg_del/2023/2772/oj).

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einzuholen, die über die nach dem verhältnismäßigen Standard für börsennotierte KMU (LSME) offenzulegenden Informationen hinausgehen.

(7) Die Kommission hat die EFRAG aufgefordert, unabhängig von dem in der Richtlinie (EU) 2022/2464 vorgesehenen Standard für börsennotierte KMU einen gesonderten, einfacheren Standard für nicht börsennotierte KMU auszuarbeiten, den diese auf freiwilliger Basis nutzen könnten. Am 12. September 2023 legte die Kommission das KMU-Entlastungspaket vor[9]. Im Rahmen von dessen Aktion 14 hat sich die Kommission dazu verpflichtet, einen einfachen und standardisierten Rahmen für KMU zur Berichterstattung über ESG-Aspekte sicherzustellen, dadurch für KMU die Möglichkeiten zur Beschaffung grüner Finanzierungen zu verbessern und so den Übergang zu einer nachhaltigen Wirtschaft zu erleichtern. Dieser standardisierte Rahmen für KMU würde auch das Risiko begrenzen, dass die Angabepflichten durch den Trickle-down-Effekt auch nicht börsennotierte, unter die Richtlinie (EU) 2022/2464 fallende KMU in der Wertschöpfungskette treffen.

(8) Hauptziel dieses freiwilligen Standards ist es, den nicht unter die Richtlinie (EU) 2022/2464 fallenden Unternehmen dabei zu helfen, Auskunftsersuchen von Finanzinstituten, großen Unternehmen und sonstigen Interessenträgern zu beantworten. Er soll für KMU die Notwendigkeit verringern, getrennte Auskunftsersuchen einzelner Gegenparteien zu beantworten, die diese zur Erfüllung ihrer Berichts- oder Sorgfaltspflicht, für die Zwecke ihres Risikomanagements oder für andere Verwendungszwecke von Nachhaltigkeitsinformationen an sie richten. Darüber hinaus kann die freiwillige Nachhaltigkeitsberichterstattung den Zugang zu nachhaltigen Finanzierungen erleichtern und KMU dabei helfen, ihre eigene Nachhaltigkeitsleistung besser einzuschätzen und zu überwachen und so die Widerstandsfähigkeit und Wettbewerbsfähigkeit verbessern.

(9) Ein wesentlicher Aspekt eines Standards für die freiwillige Nachhaltigkeitsberichterstattung für KMU ist dessen Marktakzeptanz sowohl aufseiten der Nutzer (d. h. die Bereitschaft der Geschäfts- und Finanzpartner, für die Beschaffung von Nachhaltigkeitsdaten von KMU anstatt ihrer eigenen Fragebögen den Standard zu verwenden) als auch aufseiten der KMU (d. h. die Akzeptanz des Standards als Instrument für die Berichterstattung durch die KMU).

(10) Die EFRAG hat ihren Entwurf einer fachlichen Stellungnahme zu einem Standard für die freiwillige Nachhaltigkeitsberichterstattung für nicht börsennotierte KMU nach einem strengen förmlichen Verfahren ausgearbeitet, das eine öffentliche Konsultation und Feldversuche zu dem Standardentwurf umfasste. Sowohl die KMU selbst als auch die beabsichtigten Nutzer der gemeldeten Informationen haben sich für den freiwilligen Standard für die Nachhaltigkeitsberichterstattung für KMU (VSME-Standard) ausgesprochen und sehen ihn als vereinfachtes Instrument für die Berichterstattung, das einen erheblichen Teil der Informationsanfragen, die Banken und große Unternehmen häufig an KMU in ihren Wertschöpfungsketten richten, zuverlässig ersetzt. Die EFRAG legte der Kommission den Standard im Dezember 2024 vor.

(11) Der von der EFRAG erarbeitete VSME-Standard umfasst ein Basismodul und ein Zusatzmodul. Die Berichterstattung nach dem Basismodul stellt eine Voraussetzung

[9] Mitteilung der Kommission an das Europäische Parlament, den Rat, den Europäischen Wirtschafts- und Sozialausschuss und den Ausschuss der Regionen: KMU-Entlastungspaket (COM(2023) 535 final vom 12.9.2023.

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für die Berichterstattung nach dem Zusatzmodul dar. Das Basismodul wird als der für Kleinstunternehmen „angestrebte Ansatz“ beschrieben. Dies bedeutet, dass Kleinstunternehmen das Basismodul nicht zur Gänze anwenden müssen, sondern sich auf bestimmte Teile beschränken dürfen. Für kleine und mittlere Unternehmen wird das Basismodul als „Mindestanforderung“ für die Berichterstattung nach dem Standard beschrieben. Ergänzend zum Basismodul und zum Zusatzmodul hat die EFRAG auch praktische Leitlinien ausgearbeitet, die den KMU bei der Umsetzung der Bestimmungen des Standards selbst helfen sollen. Basismodul und Zusatzmodul sind in Anhang I dieser Empfehlung enthalten, während die ergänzenden praktischen Leitlinien in Anhang II enthalten sind.

(12) Am 26. Februar 2025 nahm die Kommission den Vorschlag für eine Richtlinie des Europäischen Parlaments und des Rates zur Änderung der Richtlinien 2006/43/EG, 2013/34/EU, (EU) 2022/2464 und (EU) 2024/1760 im Hinblick auf bestimmte Anforderungen an die Nachhaltigkeitsberichterstattung und die Sorgfaltspflichten von Unternehmen (Omnibus-Vereinfachungspaket[10])an, in dem unter anderem eine Reihe von Änderungen an den mit der Richtlinie (EU) 2022/2464 eingeführten Anforderungen an die Nachhaltigkeitsberichterstattung und an den in der Richtlinie (EU) 2024/1760 des Europäischen Parlaments und des Rates enthaltenen Sorgfaltspflichten im Bereich der Nachhaltigkeit vorgeschlagen werden.

(13) In Bezug auf die Richtlinie (EU) 2022/2464 schlägt die Kommission unter anderem vor, die Zahl der Unternehmen, die zur Nachhaltigkeitsberichterstattung verpflichtet sind, zu verringern. Dem Vorschlag der Kommission zufolge würden nur große Unternehmen mit mehr als 1000 Beschäftigten weiterhin der Pflicht zur Vorlage von Nachhaltigkeitsinformationen unterliegen. Für Unternehmen mit bis zu 1000 Beschäftigten schlägt die Kommission vor, im Wege eines delegierten Rechtsakts einen freiwilligen Standard zu erlassen. Ein solcher freiwilliger Standard würde auf dem von der EFRAG ausgearbeiteten VSME-Standard basieren.

(14) In Bezug auf die Richtlinie (EU) 2022/2464 wird mit dem vorgeschlagenen Omnibus-Vereinfachungspaket auch die Obergrenze für die Wertschöpfungskette ausgeweitet und gestärkt. Diesem Vorschlag zufolge würde die Obergrenze für die Wertschöpfungskette direkt für das berichtende Unternehmen gelten und nicht nur begrenzen, was in den ESRS festgelegt werden kann. Sie würde all diejenigen Unternehmen schützen, die gemäß dem vorgeschlagenen Omnibus-Vereinfachungspaket nicht mehr unter die Artikel 19a und 29a der Richtlinie 2013/34/EU fielen (d. h. Unternehmen mit bis zu 1000 Beschäftigten), und nicht nur KMU, wie derzeit der Fall. Und die Obergrenze würde durch den freiwilligen Standard bestimmt, der von Unternehmen mit bis zu 1000 Beschäftigten verwendet werden kann und von der Kommission im Wege eines delegierten Rechtsakts auf Basis des von der EFRAG ausgearbeiteten VSME-Standards, der Gegenstand dieser Empfehlung ist, zu erlassen ist. Mit dem Omnibus-Vereinfachungspaket wird darüber hinaus vorbehaltlich notwendiger Ausnahmen auch eine mit dem VSME-Standard verknüpfte Obergrenze für die Wertschöpfungskette in die Richtlinie (EU) 2024/1760 über die Sorgfaltspflichten von Unternehmen im Hinblick auf Nachhaltigkeit aufgenommen, die Informationsersuchen im Zusammenhang mit der Erfassung der

[10] Vorschlag für eine Richtlinie des Europäischen Parlaments und des Rates zur Änderung der Richtlinien 2006/43/EG, 2013/34/EU, (EU) 2022/2464 und (EU) 2024/1760 im Hinblick auf bestimmte Anforderungen an die Nachhaltigkeitsberichterstattung von Unternehmen und Sorgfaltspflichten von Unternehmen (COM(2025) 81 final).

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Wertschöpfungskette betrifft. Aus diesem Grund könnte der Inhalt des künftigen Standards für die freiwillige Berichterstattung für Unternehmen mit bis zu 1000 Beschäftigten von der vorliegenden Empfehlung abweichen. Ob der Kommission die Befugnis erteilt wird, diesen Standard im Wege eines delegierten Rechtsakts zu erlassen, und wann ein solcher Standard erlassen wird, hängt vom Abschluss der Verhandlungen zwischen den beiden gesetzgebenden Organen über das vorgeschlagene Omnibus-Vereinfachungspaket ab.

(15) Mit dieser Empfehlung wird eine im KMU-Entlastungspaket 2023 und in der Binnenmarktstrategie von 2025 geäußerte Forderung erfüllt. Sie stellt eine Zwischenlösung dar, um den Forderungen des Marktes nachzukommen, solange noch kein freiwilliger, auf dem von der EFRAG ausgearbeiteten VSME-Standard basierender Standard existiert, der im Wege einer delegierten Verordnung im Rahmen des Omnibus-Vereinfachungspakets zu erlassen ist, dessen Zeitplan wiederum vom Tempo und vom Abschluss der Verhandlungen zwischen den beiden gesetzgebenden Organen abhängt. In der Zwischenzeit muss es den KMU auch weiterhin dringend erleichtert werden, auf Auskunftsersuchen, die sie bereits von Finanzinstituten, Großunternehmen und anderen Interessenträgern erhalten, zu antworten. Durch Bereitstellung von Leitlinien für den Markt, in denen KMU dazu ermutigt werden, Nachhaltigkeitsinformationen anhand des von der EFRAG entwickelten VSME-Standards zu veröffentlichen, und in denen auch all diejenigen, die Nachhaltigkeitsinformationen bei KMU anfordern, zur weitestmöglichen Verwendung dieses Standards angehalten werden, kann die Kommission den Verwaltungsaufwand für KMU und andere Interessenträger verringern.

(16) Die Kommission legt deshalb diese Empfehlung vor, wonach nicht börsennotierte KMU und Kleinstunternehmen, die freiwillig Nachhaltigkeitsinformationen vorlegen möchten, hierbei nach dem von der EFRAG erarbeiteten VSME-Standard verfahren sollten. Zu diesem Zweck werden Selbstauskünfte von nicht börsennotierten KMU und Kleinstunternehmen als verhältnismäßig betrachtet. Somit müssen nicht börsennotierte KMU für die von ihnen gemeldeten Informationen keine Bestätigung vorlegen, sondern reicht eine Selbstauskunft aus. Nicht börsennotierte KMU und Kleinstunternehmen können auch auf die von der EFRAG ausgearbeiteten praktischen Leitlinien zurückgreifen, die dem freiwilligen Standard beigefügt sind und dessen praktische Anwendung erleichtern.

(17) Die Kommission hat große Unternehmen und Finanzintermediäre dazu angehalten, bei Geschäften mit KMU den Grundsatz der Verhältnismäßigkeit anzuwenden und Zurückhaltung zu üben, wenn sie von Partnern in der Lieferkette von KMU Informationen anfordern[11]. Nach Annahme dieser Empfehlung sollten große Unternehmen und Finanzintermediäre solche Anfragen so weit wie möglich auf Informationen beschränken, die mit den im VSME-Standard enthaltenen Angaben in Einklang stehen.

(18) Auch den Mitgliedstaaten kommt eine wichtige Rolle im Hinblick darauf zu, für den VSME-Standard zu sensibilisieren und dessen Anwendung zu fördern, um die Unternehmen zu entlasten und die Informationen, die KMU auf verschiedene Anfragen erteilen müssen, zu straffen. Dem Ziel des grünen und digitalen Wandels

[11] Empfehlung (EU) 2023/1425 der Kommission vom 27. Juni 2023 zur Vereinfachung der Finanzierung für die Umstellung auf eine nachhaltige Wirtschaft, C/2023/3844, ABl. L 174 vom 7.7.2023, S. 19, ELI: http://data.europa.eu/eli/reco/2023/1425/oj.

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von KMU entsprechend ist es wichtig, KMU die Nachhaltigkeitsberichterstattung durch digitale Lösungen und Instrumente zu erleichtern. Zu diesem Zweck prüft die Kommission im Einklang mit dem im Anhang I enthaltenen VSME die Möglichkeit, zur Extraktion der für die Nachhaltigkeitsberichterstattung relevanten Daten die elektronische Rechnungsstellung zu nutzen. Im Rahmen des Instruments für technische Unterstützung (TSI) hat die Kommission ferner 2025 das Vorzeigeprojekt „Improving Sustainability Reporting for Businesses“ (Verbesserung der Nachhaltigkeitsberichterstattung für Unternehmen) gestartet, das die Mitgliedstaaten fachlich dabei unterstützen soll, für die Nachhaltigkeitsberichterstattung von Unternehmen auf nationaler Ebene digitale Unterstützung bereitzustellen und digitale Kapazitäten aufzubauen.

(19) Um ihre Sichtbarkeit für potenzielle Investoren zu erhöhen und so ihre Finanzierungsmöglichkeiten zu verbessern und zu diversifizieren, könnten kleine Unternehmen Informationen zu ihrer Nachhaltigkeit künftig über das zentrale europäische Zugangsportal (ESAP) öffentlich machen wollen. Zu diesem Zweck müssten kleine Unternehmen bestimmte Metadaten zur Verfügung stellen und zur Übermittlung solcher Informationen ein bestimmtes Format verwenden.

(20) Für eine nachhaltige Kreditvergabe oder nachhaltige Anlagen könnten Kreditgeber oder Anleger von KMU möglicherweise andere Arten von Nachhaltigkeitsinformationen als die unter den VSME-Standard fallenden anfordern. Die Kommission wird die im Rahmen des KMU-Entlastungspakets gemachte Zusage, KMU in größerem Maßstab nachhaltige Finanzierungen zu ermöglichen, auch gestützt auf den Bericht „Streamlining Sustainable Finance to SMEs“ der Plattform für ein nachhaltiges Finanzwesen und aufbauend auf bestehenden Rahmenwerken wie dem Anwendungsfalldokument der InvestEU-Nachhaltigkeitsgarantie und dem Green Checker der Europäischen Investitionsbank gesondert weiterverfolgen.

(21) Der in Anhang I enthaltene Standard für die freiwillige Nachhaltigkeitsberichterstattung lässt die Berichtspflichten von Unternehmen, die sich aus anderen Rechtsvorschriften der Union ergeben, unberührt —

EMPFIEHLT:

Begriffsbestimmungen:

Für die Zwecke dieser Empfehlung bezeichnet der Ausdruck

1. „kleine und mittlere Unternehmen (KMU)“ die in Artikel 3 Absätze 2 und 3 der Richtlinie 2013/34/EU genannten Unternehmen;

2. „Kleinstunternehmen“ ein in Artikel 3 Absatz 1 der Richtlinie 2013/34/EU genanntes Unternehmen;

3. „Finanzmarktteilnehmer“

a) ein Versicherungsunternehmen, das ein Versicherungsanlageprodukt (insurance-based investment product, IBIP) anbietet,

b) eine Wertpapierfirma, die Portfolioverwaltung erbringt,

c) eine Einrichtung der betrieblichen Altersversorgung (EbAV),

d) einen Hersteller eines Altersvorsorgeprodukts,

e) einen Verwalter alternativer Investmentfonds (alternative investment fund manager, AIFM),

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f) einen Anbieter eines Paneuropäischen Privaten Pensionsprodukts (pan-European Personal Pension Product, PEPP-Anbieter),

g) einen Verwalter eines qualifizierten Risikokapitalfonds, der gemäß Artikel 14 der Verordnung (EU) Nr. 345/2013 des Europäischen Parlaments und des Rates registriert ist,

h) einen Verwalter eines qualifizierten Fonds für soziales Unternehmertum, der gemäß Artikel 15 der Verordnung (EU) Nr. 346/2013 des Europäischen Parlaments und des Rates registriert ist,

i) eine Verwaltungsgesellschaft für Organismen für gemeinsame Anlagen in Wertpapieren (OGAW-Verwaltungsgesellschaft);

4. „Versicherungsunternehmen“ ein Versicherungsunternehmen, das gemäß Artikel 18 der Richtlinie 2009/138/EG des Europäischen Parlaments und des Rates zugelassen ist;

5. „Finanzinstitut“ ein Finanzinstitut im Sinne von Artikel 4 Absatz 1 Nummer 26 der Verordnung (EU) Nr. 575/2013 des Europäischen Parlaments und des Rates.

Empfehlungen an KMU:

1. Die Kommission empfiehlt nicht börsennotierten KMU und Kleinstunternehmen, die freiwillig Nachhaltigkeitsinformationen vorlegen möchten, hierbei nach dem in Anhang I enthaltenen Standard für die freiwillige Nachhaltigkeitsberichterstattung zu verfahren.

2. Der in Anhang I enthaltene Standard für die freiwillige Nachhaltigkeitsberichterstattung kann auch von KMU und Kleinstunternehmen in Drittländern genutzt werden, die freiwillig Nachhaltigkeitsinformationen bereitstellen möchten.

3. Unternehmen, die den Standard in Anhang I zur freiwilligen Bereitstellung von Nachhaltigkeitsinformationen nutzen, können auch die praktischen Leitlinien in Anhang II verwenden.

Empfehlungen an Finanzinstitute, Finanzmarktteilnehmer, Versicherungsunternehmen, Kreditinstitute und andere Unternehmen, die bei KMU Nachhaltigkeitsinformationen anfordern:

4. Die Kommission empfiehlt, dass Unternehmen, die die in den Artikeln 19a und 29a der Richtlinie 2013/34/EU festgelegten Anforderungen erfüllen müssen und für die Zwecke der Nachhaltigkeitsberichterstattung von KMU in ihrer Wertschöpfungskette Nachhaltigkeitsinformationen benötigen, ihre Informationsersuchen so weit wie möglich auf die Informationen beschränken sollten, die gemäß dem Standard für die freiwillige Nachhaltigkeitsberichterstattung in Anhang I bereitgestellt werden.

5. Die Kommission empfiehlt, dass Finanzinstitute, Finanzmarktteilnehmer, Versicherungsunternehmen und Kreditinstitute, die Nachhaltigkeitsinformationen von KMU benötigen, ihre Informationsersuchen so weit wie möglich auf die Informationen beschränken sollten, die gemäß dem Standard für die freiwillige Nachhaltigkeitsberichterstattung in Anhang I bereitgestellt werden.

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6. Die Kommission empfiehlt den Mitgliedstaaten, KMU in stärkerem Maße für die mit der freiwilligen Bereitstellung von Nachhaltigkeitsinformationen gemäß dem Standard in Anhang I verbunden Vorteile zu sensibilisieren.

7. Die Kommission empfiehlt den Mitgliedstaaten, auf nationaler Ebene geeignete Maßnahmen zur Förderung der Umsetzung und Akzeptanz des Standards für die freiwillige Nachhaltigkeitsberichterstattung von KMU in Anhang I zu treffen.

8. Die Kommission empfiehlt den Mitgliedstaaten ferner, auf nationaler Ebene geeignete Maßnahmen zu treffen, um die in den Absätzen 4 und 5 genannten Unternehmen dazu anzuhalten, ihre für die Zwecke der Nachhaltigkeitsberichterstattung an KMU und Kleinstunternehmen gerichteten Ersuchen um Nachhaltigkeitsinformationen so weit wie möglich auf die Informationen zu beschränken, die gemäß dem Standard für die freiwillige Nachhaltigkeitsberichterstattung in Anhang I bereitgestellt werden.

9. Um einen wirkungsvollen Datenaustausch zu ermöglichen, der der Eigenschaft der KMU als Dateneigentümer Rechnung trägt, empfiehlt die Kommission den Mitgliedstaaten, geeignete Maßnahmen zu treffen, um die automatische Digitalisierung der Nachhaltigkeitsberichterstattung von KMU nach dem Standard in Anhang I zu fördern.

Brüssel, den 30.7.2025

Für die Kommission
Maria Luís Albuquerque
Mitglied der Kommission

Stand: 01.02.2026

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KOMMISSION

Brüssel, den 30.7.2025
C(2025) 4984 final

ANNEX 1

ANHANG

der

Empfehlung der Kommission

für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

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„Anhang I der EU-Empfehlung – VSME“
Anhang I der Empfehlung der Kommission für einen Standard für die freiwillige Berichterstattung kleiner und mittlerer Unternehmen vom 30.07.2025 (33 Seiten, pdf)

https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme-annex-1_de.pdf

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Brüssel, den 30.7.2025
C(2025) 4984 final

ANNEX 1

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der

Empfehlung der Kommission

für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

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ANHANG I

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Ziel dieses Standards und von ihm abgedeckte Unternehmen

1. Ziel dieses freiwilligen Standards ist es, Kleinstunternehmen sowie kleine und mittlere Unternehmen bei Folgendem zu unterstützen:

   (a) Bereitstellung von Informationen, mit denen der Datenbedarf großer Unternehmen, die Nachhaltigkeitsinformationen von ihren Lieferanten verlangen, erfüllt wird;

   (b) Bereitstellung von Informationen, mit denen der Datenbedarf von Banken und Investoren erfüllt wird, wodurch den Unternehmen der Zugang zu Finanzmitteln erleichtert wird;

   (c) Verbesserung der Behandlung von Nachhaltigkeitsaspekten, mit denen Unternehmen umgehen müssen, d. h. ökologische und soziale Herausforderungen wie Umweltverschmutzung, Gesundheitsschutz der Arbeitskräfte und Sicherheit. Dies wird kurz-, mittel- und langfristig ihr wettbewerbsfähiges Wachstum unterstützen und ihre Resilienz stärken;

   (d) Beitrag zu einer nachhaltigeren und inklusiveren Wirtschaft.

2. Dieser Standard ist freiwillig. Er gilt für Unternehmen[1], deren Wertpapiere nicht zum Handel an einem geregelten Markt in der Europäischen Union zugelassen sind (nicht börsennotierte Unternehmen). [In Artikel 3 der Richtlinie 2013/34/EU] werden drei Kategorien kleiner und mittlerer Unternehmen auf der Grundlage ihrer Bilanzsumme, ihres Nettoumsatzerlöses und ihrer durchschnittlichen Zahl der während des Geschäftsjahres ***Beschäftigten*** definiert.

   (a) Ein Unternehmen gilt als Kleinstunternehmen, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. Bilanzsumme: 450 000 EUR;

      ii. Nettoumsatzerlös: 900 000 EUR;

      iii. durchschnittliche Beschäftigtenzahl: 10.

   (b) Ein Unternehmen gilt als kleines Unternehmen, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. Bilanzsumme: 5 Mio. EUR;

      ii. Nettoumsatzerlös: 10 Mio. EUR;

      iii. durchschnittliche Beschäftigtenzahl: 50.

   (c) Ein Unternehmen gilt als mittleres Unternehmen, wenn es zwei der folgenden Schwellenwerte nicht überschreitet:

      i. Bilanzsumme: 25 Mio. EUR;

      ii. Nettoumsatzerlös: 50 Mio. EUR;

      iii. durchschnittliche Beschäftigtenzahl: 250.

3. Diese Unternehmen fallen nicht unter die Richtlinie über die Nachhaltigkeitsberichterstattung von Unternehmen (Corporate Sustainability Reporting Directive – CSRD), ihnen wird allerdings empfohlen, den vorliegenden Standard zu verwenden. Er deckt dieselben Nachhaltigkeitsaspekte ab wie die Europäischen Standards für die Nachhaltigkeitsberichterstattung (European Sustainability Reporting Standards – ESRS) für große Unternehmen. Dabei ist er jedoch verhältnismäßig und trägt somit den grundlegenden Merkmalen von Kleinstunternehmen sowie kleinen und mittleren Unternehmen Rechnung. Kleinstunternehmen steht es offen, nur bestimmte Teile dieses Standards, wie in Nummer 5 Buchstabe a dargelegt, zu verwenden.

4. Bei der Ausarbeitung dieses Standards wurde sorgfältig auf die Kohärenz mit den ESRS für große Unternehmen geachtet und gleichzeitig wurden verhältnismäßige Anforderungen festgelegt. Im Gegensatz zu den ESRS für große Unternehmen besitzt dieser Standard keine Rechtskraft.

[1] Dazu gehören Selbstständige, Unternehmen ohne eigene Rechtspersönlichkeit und börsennotierte Kleinstunternehmen.

Aufbau dieses Standards

5. Dieser Standard umfasst zwei Module, die das Unternehmen zur Erstellung seines Nachhaltigkeitsberichts verwenden kann:

   (a) **Basismodul:** Angaben B1 und B2 sowie Basiskennzahlen (B3 bis B11). Dieses Modul ist der angestrebte Ansatz für Kleinstunternehmen und stellt eine Mindestanforderung für andere Unternehmen dar.

   (b) **Zusatzmodul (umfassendes Modul):** Dieses Modul umfasst Datenpunkte, die über die Angaben B1 bis B11 hinausgehen und von Banken, Anlegern und Firmenkunden des Unternehmens zusätzlich zum Basismodul verlangt werden dürften.

   In Nummer 24 werden die verfügbaren Optionen für die Erstellung eines Nachhaltigkeitsberichts erläutert, bei dem dieser Standard mit einem oder mehreren dieser Module angewendet wird. Ein einmal gewähltes Modul muss vollständig erfüllt werden (mit der in Nummer 22 vorgesehenen Flexibilität); jede Angabe ist jedoch nur zu machen, wenn sie auf die besonderen Umstände des Unternehmens zutrifft.

6. Die Anwendung des Basismoduls ist eine Voraussetzung für die Anwendung des Zusatzmoduls.

7. Anlage A *Begriffsbestimmungen* enthält die Definitionen der in diesem Standard verwendeten Begriffe. Im gesamten VSME-Standard werden Begriffe, die im Glossar der Begriffsbestimmungen (Anlage A) definiert sind, ***fett und kursiv*** dargestellt, es sei denn, ein definierter Begriff wird in demselben Absatz mehr als einmal verwendet.

Grundsätze für die Erstellung des Nachhaltigkeitsberichts (Basismodul und Zusatzmodul)

Einhaltung dieses Standards

8. Dieser Standard legt Anforderungen fest, die es dem Unternehmen ermöglichen, relevante Informationen zu folgenden Fragestellungen bereitzustellen:

   (a) wie es kurz-, mittel- oder langfristig positive oder negative ***Auswirkungen*** auf Menschen oder die Umwelt hatte bzw. haben könnte;

   (b) wie sich ökologische und soziale Aspekte kurz-, mittel- oder langfristig auf seine Finanzlage, Leistung und seinen Cashflow ausgewirkt haben oder auswirken könnten.

9. Das Unternehmen muss in seinem Bericht relevante, wahrheitsgetreue, vergleichbare, verständliche und überprüfbare Informationen angeben.

10. Je nach Art der von dem Unternehmen ausgeübten Tätigkeiten ist es angemessen, mit zusätzlichen Informationen (Kennzahlen und/oder beschreibende Angaben), die nicht in diesem Standard erfasst sind, Nachhaltigkeitsaspekte offenzulegen, die im Tätigkeitsbereich des Unternehmens üblich sind (d. h. die typischerweise bei Unternehmen oder Einrichtungen auftreten, die in einer bestimmten Branche oder einem bestimmten Bereich tätig sind) oder die für das Unternehmen spezifisch sind, da dies die Erstellung relevanter, wahrheitsgetreuer, vergleichbarer, verständlicher und überprüfbarer Informationen unterstützt. Dies schließt auch die Berücksichtigung von Informationen über Scope-3-Treibhausgasemissionen (siehe Nummern 50 bis 53) ein. Anlage B enthält eine Liste möglicher Nachhaltigkeitsaspekte.

11. Das Unternehmen darf die Kennzahlen des Basismoduls und des Zusatzmoduls gegebenenfalls durch zusätzliche qualitative und/oder quantitative Informationen nach Nummer 10 ergänzen.

Vergleichsinformationen

12. Das Unternehmen gibt in seinem Bericht außer in Bezug auf erstmals angegebene Kennzahlen Vergleichsinformationen für das Vorjahr an. Das Unternehmen gibt Vergleichsinformationen ab dem zweiten Jahr der Berichterstattung an.

„Falls-zutreffend"-Grundsatz

13. Bestimmte Angaben sind nur unter besonderen Umständen bereitzustellen[2]. In den Anleitungen zu jeder Angabe werden diese Umstände und die Informationen, die nur dann zu melden sind, wenn das Unternehmen sie als „zutreffend" ansieht, im Einzelnen spezifiziert. Wird eine dieser Angaben ausgelassen, so wird davon ausgegangen, dass sie nicht zutreffend ist.

Einbeziehung von Tochterunternehmen in die Berichtsdaten

14. Ist das Unternehmen ein Mutterunternehmen einer Gruppe, wird empfohlen, dass es seinen Nachhaltigkeitsbericht auf konsolidierter Basis mit Angaben zu seinen Tochterunternehmen erstellt.

15. Wenn das Mutterunternehmen seinen Nachhaltigkeitsbericht auf konsolidierter Basis mit Angaben zu seinen Tochterunternehmen erstellt, sind die Tochterunternehmen von der Berichterstattung befreit.

Zeitpunkt und Ort der Erstellung des Nachhaltigkeitsberichts

16. Wird ein Nachhaltigkeitsbericht erstellt, um den Anforderungen großer Unternehmen oder Banken gerecht zu werden, die eine jährliche Aktualisierung verlangen, so wird er jährlich erstellt. Stellt das Unternehmen Abschlüsse auf, wird der Nachhaltigkeitsbericht in Bezug auf einen Zeitraum erstellt, der mit der Erstellung des Jahresabschlusses kohärent ist. Haben sich bestimmte Datenpunkte gegenüber dem vorangegangenen Berichtsjahr nicht geändert, darf das Unternehmen angeben, dass keine Änderungen eingetreten sind, und auf die für diesen spezifischen Datenpunkt im Vorjahresbericht bereitgestellten Informationen verweisen.

17. Dieser Bericht dient in erster Linie dazu, Informationen für tatsächliche oder potenzielle Geschäftspartner bereitzustellen. Das Unternehmen kann beschließen, seinen Nachhaltigkeitsbericht der Öffentlichkeit zugänglich zu machen. In diesem Fall kann das Unternehmen seinen Nachhaltigkeitsbericht in einem

[2] Zum Beispiel wenn die gesetzliche Verpflichtung zur Offenlegung bestimmter Informationen besteht oder wenn bestimmte Informationen bereits freiwillig im Rahmen eines Umweltmanagementsystems offengelegt werden.

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gesonderten Abschnitt des Managementberichts vorlegen, wenn es über einen solchen verfügt. Andernfalls kann das Unternehmen seinen Nachhaltigkeitsbericht als gesondertes Dokument vorlegen.

18. Um zu vermeiden, dass dieselben Informationen doppelt veröffentlicht werden, kann das Unternehmen in seinem Nachhaltigkeitsbericht auf Angaben verweisen, die in anderen Dokumenten veröffentlicht wurden, die zur gleichen Zeit wie der Nachhaltigkeitsbericht zugänglich sind[3].

Verschlusssachen und vertrauliche Informationen

19. Würden die in diesem Standard vorgesehenen Angaben die Offenlegung von ***Verschlusssachen*** oder ***vertraulichen Informationen*** erfordern, so kann das Unternehmen diese Informationen auslassen. Entscheidet sich das Unternehmen für die Auslassung dieser Informationen, teilt es diesen Umstand unter Angabe B1 mit (siehe Nummer 24).

Kohärenz und Verknüpfungen mit den Angaben in Abschlüssen

20. Erstellt das Unternehmen auch Abschlüsse, müssen die in seinem Nachhaltigkeitsbericht nach diesem Standard enthaltenen Informationen

    (a) mit den Angaben in den Abschlüssen für denselben Zeitraum übereinstimmen und

    (b) in einer Weise dargestellt werden, die das Verständnis der Zusammenhänge mit den in den Abschlüssen ausgewiesenen Informationen erleichtert, z. B. durch geeignete Querverweise.

[3] In einer künftigen Online-Tool-Version des VSME-Standards kann das Unternehmen gegebenenfalls auf Angaben verweisen, die nicht im Nachhaltigkeitsbericht, sondern in anderen Dokumenten veröffentlicht wurden, indem es diese Dokumente durch Verweis einbezieht. Dieser Verweis erfolgt durch Aufnahme der Seitennummer der betreffenden Quelle, sofern das Quelldokument im PDF-Format ebenfalls in der Online-Tool-Version zur Verfügung gestellt wird.

Basismodul

21. Das Unternehmen erstattet über Aspekte seiner Umwelt- Sozial- und ***Unternehmenspolitik*** (zusammen „Nachhaltigkeitsaspekte“) anhand der nachstehenden Angaben B1 bis B11 Bericht.

22. Wenn das Unternehmen umfassendere Informationen bereitstellen möchte, kann es die unter B1 bis B11 geforderten Kennzahlen auch mit Angaben zusammenführen, die es aus dem Zusatzmodul auswählt.

23. Zusätzliche Erläuterungen zu den Angaben B1 bis B11 enthalten die Nummern 1 bis 144 in Anhang II.

Basismodul – Allgemeine Informationen

B1 – Grundlagen für die Erstellung

24. Das Unternehmen gibt Folgendes an:

    (a) welche der folgenden Optionen es gewählt hat:

        i. OPTION A: Basismodul (ausschließlich) oder

        ii. Option B: Basismodul und Zusatzmodul;

    (b) ob das Unternehmen Angaben ausgelassen hat, weil diese als ***Verschlusssachen*** oder ***vertrauliche Informationen*** eingestuft werden (siehe Nummer 19), und, falls dies zutrifft, um welche Angaben es sich handelt;

    (c) ob der Nachhaltigkeitsbericht auf individueller Basis (d. h. der Bericht ist auf Informationen über das Unternehmen beschränkt) oder auf konsolidierter Basis (d. h. der Bericht enthält Informationen über das Unternehmen und seine Tochterunternehmen) erstellt wurde;

    (d) im Falle eines konsolidierten Nachhaltigkeitsberichts, eine Liste der im Bericht erfassten Tochterunternehmen mit ihrer eingetragenen Anschrift[4];

    (e) die folgenden Informationen:

        i. Rechtsform des Unternehmens,

        ii. NACE-Code(s) zur Klassifikation der Wirtschaftszweige,

        iii. Bilanzsumme (Gesamtvermögen in Geldeinheiten),

        iv. Umsatzerlöse (in Geldeinheiten),

        v. Zahl der ***Beschäftigten*** als Anzahl der Personen oder in Vollzeitäquivalenten,

        vi. Land der Hauptgeschäftstätigkeit und Standort des/der wesentlichen Vermögenswerte(s),

        vii. Geoposition von ***Standorten***, die das Unternehmen besitzt, gepachtet hat oder bewirtschaftet.

25. Hat das Unternehmen eine Nachhaltigkeitszertifizierung oder ein Nachhaltigkeitssiegel erhalten, sind diese Zertifikate oder Siegel kurz zu beschreiben (falls relevant, unter Angabe der Aussteller der Zertifizierung oder des Siegels, des Datums und der Bewertungsnote).

B2 – Verfahrensweisen, Richtlinien und künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

26. Hat das Unternehmen spezifische Verfahrensweisen, Richtlinien oder künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft eingeführt, ist dies anzugeben. Das Unternehmen muss angeben, ob es

    (a) über Verfahrensweisen verfügt. Verfahrensweisen können in diesem Zusammenhang beispielsweise Bemühungen zur Senkung des Wasser- und Stromverbrauchs des Unternehmens, zur Verringerung der Treibhausgasemissionen (im Folgenden auch „THG-Emissionen“) oder zur Vermeidung von Umweltverschmutzung umfassen sowie Initiativen zur Verbesserung der Produktsicherheit, laufende Maßnahmen zur Verbesserung der Arbeitsbedingungen und der Gleichbehandlung am Arbeitsplatz,

[4] Die eingetragene Anschrift ist die offizielle Anschrift des Unternehmens.

Schulungen für die Arbeitskräfte des Unternehmens im Bereich Nachhaltigkeit sowie Partnerschaften im Zusammenhang mit Nachhaltigkeitsprojekten;

(b) über ***Richtlinien*** zu Nachhaltigkeitsaspekten verfügt, ob diese öffentlich zugänglich sind und ob es über gesonderte Richtlinien in den Bereichen Umwelt, Soziales oder Governance verfügt, die für Nachhaltigkeitsthemen angewendet werden;

(c) künftige Initiativen oder zukunftsorientierte Pläne gibt, die zu Nachhaltigkeitsaspekten umgesetzt werden;

(d) ***Ziele*** festgelegt hat, anhand derer die Umsetzung der ***Richtlinien*** überwacht werden, und welche Fortschritte im Hinblick auf die Zielerreichung erzielt wurden.

27. Diese Verfahrensweisen, Richtlinien und künftigen Initiativen umfassen alle Maßnahmen, die das Unternehmen ergreift, um seine negativen ***Auswirkungen*** auf Mensch und Umwelt zu verringern und seine positiven Auswirkungen zu verstärken, um so zu einer nachhaltigeren Wirtschaft beizutragen. Anlage B enthält eine Liste möglicher Nachhaltigkeitsaspekte, die Gegenstand dieser Angabe sein könnten. Das Unternehmen kann für die Bereitstellung dieser Informationen den Meldebogen in Anhang II Nummer 14 verwenden.

28. Wenn das Unternehmen auch im Rahmen des Zusatzmoduls Bericht erstattet, ergänzt es die unter B2 bereitgestellten Informationen durch die in C2 aufgeführten Datenpunkte.

Basismodul – Umweltkennzahlen

B3 – Energie und Treibhausgasemissionen

29. Das Unternehmen legt seinen Gesamtenergieverbrauch in MWh offen und schlüsselt die Angaben entsprechend der nachstehenden Tabelle auf, wenn es die für eine solche Aufschlüsselung erforderlichen Informationen beschaffen kann:

	Erneuerbar	Nicht erneuerbar	Insgesamt
Strom (wie in den Rechnungen der Versorgungsunternehmen angegeben)			
Kraft-/Brennstoffe			

30. Das Unternehmen gibt seine geschätzten ***Treibhausgas-(THG-)Bruttoemissionen*** in Tonnen CO_2-Äquivalent (tCO_2eq) nach den Festlegungen des Unternehmensstandards des THG-Protokolls (GHG Protocol, Corporate Standard) (Version 2004) an, einschließlich

(a) der Scope-1-Treibhausgasemissionen in tCO_2eq (aus Quellen, die sich im Eigentum oder unter der Kontrolle des Unternehmens befinden);

(b) der ***standortbezogenen Scope-2-Emissionen*** in tCO_2eq (d. h. Emissionen aus der Erzeugung erworbener Energie wie Elektrizität, Wärme, Dampf oder Kühlung).

31. Das Unternehmen gibt seine Treibhausgasintensität an, die berechnet wird, indem die unter Nummer 30 angegebenen „***Treibhausgas-(THG-)Bruttoemissionen***“ durch die unter Nummer 24 Buchstabe e Ziffer iv angegebenen „Umsatzerlöse (in Geldeinheiten)“ dividiert werden[5].

B4 – Luft-, Wasser- und Bodenverschmutzung

32. Ist das Unternehmen aufgrund rechtlicher oder sonstiger nationaler Vorschriften bereits verpflichtet, den zuständigen Behörden seine Schadstoffemissionen zu melden, oder meldet es diese Emissionen freiwillig im Rahmen eines Umweltmanagementsystems, so gibt es die Schadstoffe, die es im Rahmen seiner eigenen Tätigkeiten in Luft, Wasser und Boden emittiert, mit der jeweiligen Menge jedes Schadstoffs an. Sind diese Informationen bereits öffentlich zugänglich, kann das Unternehmen alternativ auf das Dokument verweisen,

[5] In einer künftigen Online-Tool-Version des VSME-Standards wird dieser Wert automatisch berechnet.

in dem sie enthalten sind, z. B. durch Angabe des entsprechenden URL-Links oder durch Einbettung eines Hyperlinks.

B5 – Biodiversität

33. Das Unternehmen gibt die Anzahl und die Fläche (in Hektar oder m^2) der ***Standorte*** an, die es in oder ***in der Nähe von*** einem ***Gebiet mit schutzbedürftiger Biodiversität*** besitzt, gepachtet hat oder bewirtschaftet.

34. Das Unternehmen kann Kennzahlen in Bezug auf die ***Flächennutzung*** (in Hektar oder m^2) angeben:

    (a) gesamter Flächenverbrauch,

    (b) gesamte versiegelte Fläche,

    (c) gesamte ***naturnahe Fläche*** auf dem Gelände des Standorts,

    (d) gesamte ***naturnahe Fläche*** abseits des Standorts.

B6 – Wasser

35. Das Unternehmen gibt seine gesamte ***Wasserentnahme*** an, d. h. die Menge an Wasser, das in die Systemgrenzen der Organisation (oder Anlage) eingebracht wird; darüber hinaus weist das Unternehmen gesondert die Menge des Wassers aus, das an ***Standorten*** in Gebieten mit hohem Wasserstress entnommen wird.

36. Wendet das Unternehmen Produktionsverfahren mit erheblichem Wasserverbrauch an (z. B. thermische Energieprozesse wie Trocknung oder Stromerzeugung, Herstellung von Waren, landwirtschaftliche Bewässerung usw.), gibt es seinen ***Wasserverbrauch*** an, der als Differenz zwischen der ***Wasserentnahme*** und der Ableitung von Wasser aus seinen Produktionsverfahren berechnet wird.

B7 – Ressourcennutzung, Kreislaufwirtschaft und Abfallbewirtschaftung

37. Das Unternehmen gibt an, ob und, wenn ja, wie es die ***Grundsätze der Kreislaufwirtschaft*** anwendet.

38. Das Unternehmen gibt Folgendes an:

    (a) das jährliche Gesamtabfallaufkommen, aufgeschlüsselt nach Art (nicht gefährlich und gefährlich),

    (b) die jährliche Gesamtmenge der Abfälle, die zum ***Recycling*** oder zur Wiederverwendung umgeleitet werden,

    (c) wenn das Unternehmen in einem Wirtschaftszweig mit erheblichen Materialflüssen tätig ist (z. B. Herstellung, Baugewerbe/Bau, Abfüllen/Verpacken u. a.), den jährlichen Massenstrom der verwendeten relevanten Materialien.

<u>Basismodul – Sozialkennzahlen</u>

B8 – Arbeitskräfte – Allgemeine Merkmale

39. Das Unternehmen gibt die Zahl der ***Beschäftigten*** als Anzahl der Personen oder in Vollzeitäquivalenten zu den folgenden Kennzahlen an:

    (a) Art des Arbeitsvertrags (befristet oder unbefristet),

    (b) Geschlecht,

    (c) Land des Arbeitsvertrags, wenn das Unternehmen in mehr als einem Land tätig ist.

40. Hat das Unternehmen 50 ***Beschäftigte*** oder mehr, so gibt es die Beschäftigtenfluktuation im Berichtszeitraum an.

B9 – Arbeitskräfte – Gesundheitsschutz und Sicherheit

41. Das Unternehmen gibt in Bezug auf seine ***Beschäftigten*** Folgendes an:

    (a) die Zahl und die Quote der ***meldepflichtigen Arbeitsunfälle***,

    (b) die Zahl der Todesfälle infolge arbeitsbedingter Verletzungen und arbeitsbedingter Erkrankungen.

B10 – Arbeitskräfte – Vergütung, Tarifverhandlungen und Schulung

42. Das Unternehmen gibt Folgendes an:

    (a) ob die ***Beschäftigten*** ein ***Entgelt*** mindestens in Höhe des Mindestlohns erhalten, der in dem Land gilt, auf das sich der Bericht bezieht, und der direkt durch das nationale Mindestlohngesetz oder in einem Tarifvertrag festgelegt wird,

    (b) das prozentuale Entgeltgefälle zwischen weiblichen und männlichen ***Beschäftigten***. Das Unternehmen kann diese Angabe auslassen, wenn seine Beschäftigtenzahl unter 150 liegt, wobei zu beachten ist, dass dieser Schwellenwert ab dem 7. Juni 2031 auf 100 Beschäftigte gesenkt wird,

    (c) den prozentualen Anteil der ***Beschäftigten***, die von Tarifverträgen abgedeckt sind,

    (d) die durchschnittliche jährliche Stundenzahl der ***Schulungen*** je ***Beschäftigtem***, aufgeschlüsselt nach Geschlecht.

Basismodul – Governance-Kennzahlen

B11 – Verurteilungen und Geldstrafen wegen Korruption und Bestechung

43. Falls im Berichtszeitraum wegen Verstößen gegen Rechtsvorschriften zur Bekämpfung von ***Korruption*** und ***Bestechung*** Verurteilungen erfolgt sind oder Geldstrafen verhängt wurden, gibt das Unternehmen die Anzahl der Verurteilungen bzw. den Gesamtbetrag der Geldstrafen an.

Zusatzmodul

44. Dieses Modul bezieht sich auf Angaben, mit denen der Informationsbedarf von Geschäftspartnern des Unternehmens, wie Investoren, Banken und Unternehmenskunden, zusätzlich zu den im Basismodul abgedeckten Informationen umfassend erfüllt wird. Die Angaben in diesem Modul spiegeln die jeweiligen Pflichten von Finanzmarktteilnehmern und Unternehmenskunden entsprechend den einschlägigen rechtlichen und sonstigen Vorschriften wider. Sie betreffen auch die Informationen, die die Geschäftspartner benötigen, um das Nachhaltigkeitsrisikoprofil des Unternehmens, z. B. als (potenzieller) Lieferant oder (potenzieller) Kreditnehmer, zu bewerten.

45. Nachstehend folgt die Liste der Angaben C1 bis C9, die zu berücksichtigen und im Bericht bereitzustellen sind, sofern sie auf die Geschäftstätigkeit und Organisation des Unternehmens anwendbar sind. Wird eine dieser Angaben ausgelassen, so wird davon ausgegangen, dass sie nicht zutreffend ist.

46. Zusätzliche Erläuterungen zu den Angaben C1 bis C9 enthalten die Nummern 145 bis 180 in Anhang II.

Zusatzmodul – Allgemeine Informationen

C1 – Strategie: Geschäftsmodell und Nachhaltigkeit – Zugehörige Initiativen

47. Das Unternehmen gibt die Kernelemente seines Geschäftsmodells und seiner Geschäftsstrategie an, was Folgendes einschließt:

    (a) eine Beschreibung bedeutender Gruppen von angebotenen Produkten und/oder Dienstleistungen,

    (b) eine Beschreibung des bedeutenden Marktes bzw. der bedeutenden Märkte, auf denen das Unternehmen tätig ist (z. B. B2B, Großhandel, Einzelhandel, Länder),

    (c) eine Beschreibung der wesentlichen Geschäftsbeziehungen (z. B. wichtige Lieferanten, Kunden, Vertriebskanäle),

    (d) wenn die Strategie Kernelemente enthält, die Nachhaltigkeitsaspekte betreffen oder beeinflussen, eine kurze Beschreibung dieser Kernelemente.

C2 – Beschreibung von Verfahrensweisen, Richtlinien und künftigen Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

48. Hat das Unternehmen spezifische Verfahrensweisen, ***Richtlinien*** oder künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft eingeführt, die es bereits im Basismodul unter B2 angegeben hat, sind diese kurz zu beschreiben. Das Unternehmen kann zu diesem Zweck den Meldebogen in Anhang II Nummer 149 verwenden.

49. Das Unternehmen kann die höchste Personalebene angeben, die für die Umsetzung der Richtlinien verantwortlich ist, sofern im Unternehmen Festlegungen dazu bestehen.

Zusatzmodul – Umweltkennzahlen

Erwägungen bei der Angabe von Treibhausgasemissionen unter B3 (Basismodul)

50. Je nach Art der Tätigkeiten des Unternehmens kann eine Quantifizierung seiner Scope-3-Treibhausgasemissionen angemessen sein (siehe Nummer 10), um einschlägige Informationen über die ***Auswirkungen*** des Unternehmens auf den Klimawandel entlang seiner ***Wertschöpfungskette*** zu erhalten.

51. Scope-3-Emissionen sind ***indirekte Treibhausgasemissionen*** (ausgenommen Scope 2), die aus der ***Wertschöpfungskette*** eines Unternehmens stammen. Sie ergeben sich aus Tätigkeiten, die der Unternehmenstätigkeit vorgelagert (z B. eingekaufte Waren und Dienstleistungen, eingekaufte Investitionsgüter, Transport eingekaufter Waren usw.) oder nachgelagert (z. B. Transport und Vertrieb der Produkte des Unternehmens, Verwendung der verkauften Produkte, Investitionen usw.) sind.

52. Entscheidet sich das Unternehmen für die Angabe dieses Parameters, sollte es sich auf die 15 Arten von Scope-3-Treibhausgasemissionen beziehen, die im Unternehmensstandard des THG-Protokolls aufgeführt sind und im Rechnungslegungs- und Berichterstattungsstandard des THG-Protokolls für die Wertschöpfungskette von Unternehmen (Scope 3) erläutert werden. Gibt das Unternehmen seine Scope-3-Treibhausgasemissionen an, bezieht es die Scope-3-Kategorien ein, die es auf der Grundlage seiner eigenen Bewertung als signifikant (gemäß dem *Rechnungslegungs- und Berichterstattungsstandard für die Wertschöpfungskette von Unternehmen (Scope 3)*) einstuft. Weitere Anleitungen zu spezifischen

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Berechnungsmethoden für jede Kategorie können Unternehmen dem technischen Leitfaden des THG-Protokolls zur Berechnung von Scope-3-Emissionen (Technical Guidance for Calculating Scope 3 Emissions) entnehmen.

53. Gibt das Unternehmen bei der Berichterstattung über seine Scope-1- und Scope-2-Emissionen unternehmensspezifische Informationen über seine Scope-3-Emissionen an, so stellt es diese zusammen mit den unter B3 – Energie und Treibhausgasemissionen anzugebenden Informationen bereit.

C3 – THG-Reduktionsziele und Übergang für den Klimaschutz

54. Hat das Unternehmen ***Ziele*** zur Reduktion der THG-Emissionen festgelegt, so gibt es diese in absoluten Werten für Scope-1- und Scope-2-Emissionen an. Im Einklang mit den Nummern 50 bis 53 und sofern das Unternehmen Ziele zur Reduktion der Scope-3-Emissionen festgelegt hat, gibt es auch Ziele für seine signifikanten Scope-3-Kategorien an. Insbesondere gibt es Folgendes an:

    (a) das Zieljahr und den dafür festgelegten Zielwert,

    (b) das Basisjahr und den Bezugswert für das Basisjahr,

    (c) die für die ***Ziele*** verwendeten Einheiten,

    (d) den Anteil der Scope-1-, Scope-2- und, falls offengelegt, der Scope-3-Emissionen, auf den sich das Ziel bezieht;

    (e) eine Auflistung der wesentlichen Maßnahmen, die das Unternehmen zur Erreichung seiner ***Ziele*** durchzuführen beabsichtigt.

55. Ist ein Unternehmen in klimaintensiven Sektoren[6] tätig und hat einen Übergangsplan für den Klimaschutz angenommen, so kann es Informationen darüber vorlegen, mit denen u. a. erläutert wird, wie der Plan zur Verringerung der Treibhausgasemissionen beiträgt.

56. Ist ein Unternehmen in klimaintensiven Sektoren tätig und hat keinen Übergangsplan für den Klimaschutz, so gibt es an, ob und gegebenenfalls wann es einen solchen Übergangsplan annehmen wird.

C4 – Klimabedingte Risiken

57. Hat das Unternehmen klimabedingte Gefahren und klimabedingte Übergangsereignisse ermittelt, aus denen sich bei Bruttobetrachtung klimabedingte Risiken für das Unternehmen ergeben, gibt es Folgendes an:

    (a) eine kurze Beschreibung dieser klimabedingten Gefahren und klimabedingten Übergangsereignisse,

    (b) wie es die Exposition und Anfälligkeit seiner Vermögenswerte, Tätigkeiten und ***Wertschöpfungskette*** gegenüber diesen Gefahren und Übergangsereignissen bewertet hat,

    (c) die ***Zeithorizonte*** etwaiger ermittelter klimabedingter Gefahren und Übergangsereignisse,

    (d) ob es in Bezug auf klimabedingte Gefahren und Übergangsereignisse Maßnahmen zur ***Anpassung an den Klimawandel*** ergriffen hat.

58. Das Unternehmen kann angeben, welche nachteiligen Auswirkungen auf seine finanzielle Leistungsfähigkeit oder seine Geschäftstätigkeit sich kurz-, mittel- oder langfristig aus den klimabedingten Risiken ergeben könnten und ob es die Risiken als hoch, mittel oder niedrig einschätzt.

<u>Zusatzmodul – Sozialkennzahlen</u>

C5 – Zusätzliche (allgemeine) Merkmale der Arbeitskräfte

59. Hat das Unternehmen 50 ***Beschäftigte*** oder mehr, so kann es für den Berichtszeitraum das zahlenmäßige Verhältnis von Frauen zu Männern auf Führungsebene angeben.

60. Hat das Unternehmen 50 ***Beschäftigte*** oder mehr, so kann es die Anzahl der Selbstständigen, die ausschließlich für das Unternehmen tätig sind und kein eigenes Personal haben, und der Zeitarbeitskräfte,

[6] Klimaintensive Sektoren sind die Sektoren, die in den NACE-Abschnitten A bis H und im NACE-Abschnitt M gemäß dem Anhang der Delegierten Verordnung (EU) 2023/137 aufgeführt sind.

die von Unternehmen bereitgestellt werden, die in erster Linie im Bereich der „Vermittlung und Überlassung von Arbeitskräften“ tätig sind, angeben.

C6 – Zusätzliche Informationen über die Arbeitskräfte des Unternehmens – Richtlinien für die Achtung der Menschenrechte und diesbezügliche Prozesse

61. Das Unternehmen beantwortet folgende Fragen:

    (a) Verfügt das Unternehmen über einen Verhaltenskodex oder ***Richtlinien*** für die Achtung der Menschenrechte bei seinen ***eigenen Arbeitskräfte***n? (JA/NEIN)

    (b) Falls ja, sind folgende Aspekte abgedeckt:

        i. Kinderarbeit (JA/NEIN),

        ii. Zwangsarbeit (JA/NEIN),

        iii. Menschenhandel (JA/NEIN),

        iv. Diskriminierung (JA/NEIN),

        v. Unfallverhütung (JA/NEIN),

        vi. Sonstiges? (JA/NEIN – falls ja, ausführen).

    (c) Verfügt das Unternehmen über ein Verfahren zur Bearbeitung von Beschwerden der ***eigenen Arbeitskräfte***? (JA/NEIN)

C7 – Schwerwiegende Vorfälle im Zusammenhang mit Menschenrechten

62. Das Unternehmen beantwortet folgende Fragen:

    (a) Sind unter den **Arbeitskräften des Unternehmens** bestätigte Vorfälle im Zusammenhang mit Folgendem aufgetreten:

        i. Kinderarbeit (JA/NEIN),

        ii. Zwangsarbeit (JA/NEIN),

        iii. Menschenhandel (JA/NEIN),

        iv. Diskriminierung (JA/NEIN),

        v. Sonstiges? (JA/NEIN – falls ja, ausführen).

    (b) Falls ja, kann das Unternehmen die ***Maßnahmen*** beschreiben, die zur Behebung der aufgeführten ***Vorfälle*** ergriffen wurden.

    (c) Sind dem Unternehmen bestätigte ***Vorfälle*** bekannt, an denen ***Arbeitskräfte in der Wertschöpfungskette***, ***betroffene Gemeinschaften***, ***Verbraucher*** und ***Endnutzer*** beteiligt sind? Falls ja, sind Einzelheiten anzugeben.

<u>Zusatzmodul – Governance-Kennzahlen</u>

C8 – Umsatzerlöse aus bestimmten Tätigkeiten und Ausnahme von EU-Referenzwerten

63. Ist das Unternehmen in einem oder mehreren der folgenden Sektoren tätig, gibt es die damit verbundenen Umsatzerlöse aus Tätigkeiten in folgenden Bereichen an:

    (a) umstrittene Waffen (Antipersonenminen, Streumunition, chemische und biologische Waffen),

    (b) Anbau und Produktion von Tabak,

    (c) fossile Brennstoffe (Kohle, Erdöl und Erdgas) (d. h. das Unternehmen erzielt Umsatzerlöse aus der Exploration, Förderung, Gewinnung, Herstellung, Verarbeitung, Lagerung, Raffination oder dem Vertrieb, einschließlich Transport, Lagerung und Handel, von fossilen Brennstoffen im Sinne des

Artikels 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates[7]), mit einer Aufschlüsselung der Erlöse aus Kohle, Erdöl und Erdgas,

(d) Herstellung von Chemikalien, wenn das Unternehmen ein Hersteller von Pestiziden und anderen agrochemischen Erzeugnissen ist.

64. Das Unternehmen gibt an, ob es von mit dem Übereinkommen von Paris-abgestimmten EU-Referenzwerten ausgenommen ist, wie in Anhang II Nummer 177 beschrieben.

C9 – Geschlechtervielfalt im Leitungsorgan

65. Verfügt das Unternehmen über ein Leitungsorgan, gibt es das dort bestehende zahlenmäßige Verhältnis der Geschlechter an.

[7] Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates vom 11. Dezember 2018 über das Governance-System für die Energieunion und für den Klimaschutz, zur Änderung der Verordnungen (EG) Nr. 663/2009 und (EG) Nr. 715/2009 des Europäischen Parlaments und des Rates, der Richtlinien 94/22/EG, 98/70/EG, 2009/31/EG, 2009/73/EG, 2010/31/EU, 2012/27/EU und 2013/30/EU des Europäischen Parlaments und des Rates, der Richtlinien 2009/119/EG und (EU) 2015/652 des Rates und zur Aufhebung der Verordnung (EU) Nr. 525/2013 des Europäischen Parlaments und des Rates (ABl. L 328 vom 21.12.2018, S. 1).

Anlage A: Begriffsbestimmungen

Diese Anlage ist integraler Bestandteil des Standards.

Begriff	Definition
Unfallverhütung	Unfallverhütung bezieht sich auf Richtlinien und Initiativen zur Verhütung von Arbeitsunfällen und zum Schutz der Sicherheit und des Wohlergehens der Beschäftigten. Dies umfasst nicht nur Maßnahmen zur Verringerung körperlicher Risiken, sondern auch die Förderung eines sicheren und inklusiven Arbeitsumfelds, das frei von Diskriminierung und Belästigung ist.
Maßnahmen	Maßnahmen bezieht sich auf i) Maßnahmen und Aktionspläne (einschließlich Übergangspläne), die durchgeführt werden, um sicherzustellen, dass das Unternehmen festgelegte Ziele erreicht, und mit denen das Unternehmen auf wesentliche Auswirkungen, Risiken und Chancen reagiert, und ii) Entscheidungen, diese mit finanziellen, personellen oder technologischen Mitteln zu unterstützen.
Betroffene Gemeinschaften	Personen oder Gruppen, die in demselben geografischen Gebiet leben oder arbeiten und von den Tätigkeiten eines berichtenden Unternehmens oder seiner vor- und nachgelagerten Wertschöpfungskette betroffen sind oder sein könnten. Betroffene Gemeinschaften können von Gemeinschaften, die unmittelbar neben der Betriebsstätte des Unternehmens leben (lokale Gemeinschaften), bis zu in weiterer Entfernung lebenden Gemeinschaften reichen. Betroffene Gemeinschaften umfassen tatsächlich und potenziell betroffene indigene Völker.
Gebiet mit schutzbedürftiger Biodiversität	Gebiete mit schutzbedürftiger Biodiversität sind Natura-2000-Netz geschützte Gebiete, UNESCO-Welterbestätten und Biodiversitäts-Schwerpunktgebiete (Key Biodiversity Areas, KBA) sowie andere Schutzgebiete nach Anhang II Anlage D der Delegierten Verordnung (EU) 2021/2139 der Kommission.
Bestechung	Unredliche Überzeugung einer Person durch eine andere Person, zu deren Gunsten zu handeln, indem ihr ein Geldgeschenk oder ein anderer Anreiz gegeben wird.
Unternehmenspolitik	Folgende Aspekte werden zusammen als „Unternehmenspolitik“ oder „Aspekte der Unternehmenspolitik“ bezeichnet: a) Unternehmensethik und Unternehmenskultur, einschließlich der Bekämpfung von Korruption und Bestechung, des Schutzes von Hinweisgebern und des Tierwohls; b) Management der Beziehungen zu Lieferanten, einschließlich Zahlungspraktiken, insbesondere im Hinblick auf Zahlungsverzug an kleine und mittlere Unternehmen, c) Tätigkeiten und Verpflichtungen des Unternehmens im Zusammenhang mit der Ausübung seines politischen Einflusses, einschließlich seiner Lobbytätigkeiten.
Kinderarbeit	Arbeit, die Kinder ihrer Kindheit, ihres Potenzials und ihrer Würde beraubt und ihre körperliche und geistige Entwicklung beeinträchtigt. Der Begriff bezieht sich auf Arbeit, die geistig, körperlich, sozial oder moralisch gefährlich und schädlich für Kinder ist und/oder ihre Schulbildung beeinträchtigt (indem ihnen die Möglichkeit genommen wird, die Schule zu besuchen).
Tarifverhandlungen	Tarifverhandlungen sind alle Verhandlungen, die zwischen einem Arbeitgeber, einer Gruppe von Arbeitgebern oder einer oder mehreren Arbeitgeberorganisationen einerseits und einer oder mehreren Gewerkschaften

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Begriff	Definition
	oder in deren Abwesenheit den von ihnen gemäß den einzelstaatlichen Rechts- und Verwaltungsvorschriften ordnungsgemäß gewählten und ermächtigten Arbeitnehmervertretern andererseits stattfinden, um in einem Tarifvertrag i) die Arbeits- und Beschäftigungsbedingungen festzulegen und/oder ii) die Verhältnisse zwischen Arbeitgebern und Arbeitnehmern zu regeln und/oder die Verhältnisse zwischen Arbeitgebern oder ihren Organisationen und einer oder mehreren Arbeitnehmerorganisationen zu regeln.
Korruption	Missbrauch übertragener Befugnis aus persönlichem Gewinninteresse, der von Einzelpersonen oder Organisationen ausgehen kann. Dazu zählen Praktiken wie Bestechungsgelder, Betrug, Erpressung, geheime Absprachen und Geldwäsche. Außerdem umfasst Korruption das Anbieten oder die Annahme von Geschenken, Darlehen, Gebühren, Belohnungen oder sonstigen Vorteilen für eine oder von einer Person als Anreiz, etwas zu tun, das unredlich, rechtswidrig oder ein Vertrauensbruch in Bezug auf die Geschäftstätigkeit des Unternehmens ist. Dies kann Geld- oder Sachleistungen wie unentgeltliche Waren, Geschenke und Urlaub oder besondere persönliche Dienstleistungen umfassen, die zwecks eines ungerechtfertigten Vorteils erbracht werden oder zu einem moralischen Druck hinsichtlich der Erlangung eines solchen Vorteils führen können.
Verbraucher	Personen, die Waren und Dienstleistungen für den persönlichen Gebrauch entweder für sich selbst oder für Dritte erwerben, verbrauchen oder nutzen, nicht aber für den Weiterverkauf, den Handel oder für gewerbliche, geschäftliche, handwerkliche oder berufliche Zwecke.
Verschlusssachen	EU-Verschlusssachen gemäß der Definition im Beschluss des Rates vom 23. September 2013 über die Sicherheitsvorschriften für den Schutz von EU-Verschlusssachen (2013/488/EU) oder als von einem Mitgliedstaat als solche eingestuft und gemäß Anlage B dieses Beschlusses gekennzeichnet. „EU-Verschlusssachen“ bezeichnet alle mit einem EU-Geheimhaltungsgrad gekennzeichneten Informationen, deren unbefugte Weitergabe den Interessen der Europäischen Union oder eines oder mehrerer ihrer Mitgliedstaaten in unterschiedlichem Maße schaden könnte. Verschlusssachen können in vier Geheimhaltungsgrade eingestuft werden: TOP SECRET, SECRET, CONFIDENTIAL, RESTRICTED (wie in dem Beschluss des Rates definiert).
Grundsätze der Kreislaufwirtschaft	Die Grundsätze der europäischen Kreislaufwirtschaft sind: Wiederverwendbarkeit, Reparierbarkeit, Demontage, Wiederaufarbeitung oder Aufbereitung, Recycling, Rückführung in den biologischen Kreislauf, sonstige Möglichkeiten zur Optimierung der Produkt- und Materialnutzung.
Anpassung an den Klimawandel	Der Vorgang der Anpassung an den tatsächlichen und den erwarteten Klimawandel und dessen Auswirkungen.
Klimabedingte physische Risiken (Physische Risiken aufgrund des Klimawandels)	Risiken aufgrund des Klimawandels, bei denen es sich um ereignisbedingte (akut) oder längerfristige (chronische) Verschiebungen von Klimamustern handeln kann. Akute physische Risiken ergeben sich aus besonderen Gefahren, insbesondere Wetterereignissen wie Stürmen, Überschwemmungen, Bränden oder Hitzewellen. Chronische physische Risiken entstehen durch längerfristige Klimaveränderungen, beispielsweise Temperaturänderungen, und ihre Auswirkungen auf den Anstieg der Meeresspiegel, eine geringere Verfügbarkeit von Wasser, den Verlust an Biodiversität und Veränderungen in der Ertragsfähigkeit von Flächen und Böden.

Begriff	Definition
Direkte Treibhausgasemissionen (Scope 1)	Direkte Treibhausgasemissionen aus Quellen, die sich im Eigentum oder unter der Kontrolle des Unternehmens befinden.
Diskriminierung	Diskriminierung kann unmittelbar oder mittelbar erfolgen. Eine unmittelbare Diskriminierung liegt vor, wenn eine Person gegenüber anderen Personen, die sich in einer vergleichbaren Situation befinden, auf weniger günstige Weise behandelt wird. Eine mittelbare Diskriminierung liegt vor, wenn eine dem Anschein nach neutrale Regelung eine Person oder eine Gruppe, deren Angehörige gleiche Merkmale aufweisen, benachteiligt.
Beschäftigte	Einzelpersonen, die mit dem Unternehmen in einem Beschäftigungsverhältnis stehen, das den nationalen Rechtsvorschriften oder Gepflogenheiten entspricht.
Endnutzer	Personen, die ein bestimmtes Produkt oder eine bestimmte Dienstleistung letztlich nutzen oder die für die Nutzung vorgesehen sind.
Zwangsarbeit	Jede Arbeit oder Dienstleistung, die von einer Person unter Androhung von Strafe verlangt wird und für die sie sich nicht freiwillig zur Verfügung gestellt hat, nach der Definition des IAO-Übereinkommens über Zwangs- oder Pflichtarbeit von 1930 (Nr. 29). Der Begriff bezieht sich auf alle Situationen, in denen Personen mit allen Mitteln zur Ausübung einer Arbeit gezwungen werden.
Beschwerdemechanismen	Alle routinisierten, staatlichen oder nichtstaatlichen, gerichtlichen oder außergerichtlichen Verfahren, über die Interessenträger Beschwerden geltend machen und Rechtsmittel einlegen können. Beispiele für staatliche gerichtliche und außergerichtliche Beschwerdemechanismen sind Gerichte, Arbeitsgerichte, nationale Menschenrechtsinstitutionen, nationale Kontaktstellen gemäß den OECD-Leitsätzen für multinationale Unternehmen, Ombudsstellen, Verbraucherschutzbehörden, Regulierungsaufsichtsbehörden und staatliche Beschwerdestellen. Zu den nichtstaatlichen Beschwerdemechanismen gehören diejenigen, die von dem Unternehmen allein oder gemeinsam mit Interessenträgern verwaltet werden, wie Beschwerdemechanismen auf betrieblicher Ebene und Tarifverhandlungen, einschließlich der durch Tarifverträge geschaffenen Mechanismen. Dazu gehören auch Mechanismen, die von Industrieverbänden, internationalen Organisationen, Organisationen der Zivilgesellschaft oder Zusammenschlüssen von Interessenträgern verwaltet werden. Beschwerdemechanismen auf operativer Ebene werden von der Organisation entweder allein oder in Zusammenarbeit mit anderen Parteien verwaltet und sind für die Interessenträger der Organisation direkt zugänglich. Sie ermöglichen es, Beschwerden frühzeitig und direkt wahrzunehmen und anzugehen, wodurch eine Eskalation der Schäden und Beschwerden verhindert werden kann. Darüber hinaus bieten sie wichtige Rückmeldungen zur Wirksamkeit der von der Organisation wahrgenommenen Sorgfaltspflicht gegenüber den unmittelbar betroffenen Personen. Gemäß dem VN-Leitprinzip 31 müssen wirksame Beschwerdemechanismen legitim, zugänglich, berechenbar, gerecht, transparent, mit den Rechten vereinbar und eine Quelle für kontinuierliches Lernen sein. Zusätzlich zu diesen Kriterien beruhen wirksame Beschwerdemechanismen auf operativer Ebene auch auf Engagement und Dialog. Für die Organisation kann es schwieriger sein, die Wirksamkeit der Beschwerdemechanismen, an denen sie beteiligt ist, zu beurteilen, als die Wirksamkeit der Mechanismen, die sie selbst geschaffen hat.
Treibhausgase (THG)	Für die Zwecke dieses Standards sind Treibhausgase die sechs im Kyoto-Protokoll aufgeführten Gase: Kohlendioxid (CO_2), Methan (CH_4), Distickstoffoxid (N_2O), Stickstofftrifluorid (NF_3), teilfluorierte

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Begriff	Definition
	Kohlenwasserstoffe (HFKW), perfluorierte Kohlenwasserstoffe (FKW) und Schwefelhexafluorid (SF_6).
Governance	Governance ist das System von Regeln, Verfahrensweisen und Prozessen, durch die ein Unternehmen gelenkt und kontrolliert wird.
Treibhausgas-(THG-)Bruttoemissionen	Treibhausgas-(THG-)Bruttoemissionen bezeichnen die THG-Gesamtemissionen, die das Unternehmen in die Atmosphäre abgibt, ohne dass Abzüge für CO_2-Entnahmen oder andere Anpassungen berücksichtigt werden.
Gefährliche Abfälle	Abfall, der eine oder mehrere der in Anhang III Richtlinie 2008/98/EG des Europäischen Parlaments und des Rates über Abfälle aufgeführten gefährlichen Eigenschaften aufweist.
Menschenhandel	Die Anwerbung, Beförderung, Verbringung, Beherbergung oder Aufnahme von Personen, einschließlich der Übergabe oder Übernahme der Kontrolle über diese Personen, durch die Androhung oder Anwendung von Gewalt oder anderer Formen der Nötigung, durch Entführung, Betrug, Täuschung, Missbrauch von Macht oder Ausnutzung besonderer Schutzbedürftigkeit oder durch Gewährung oder Entgegennahme von Zahlungen oder Vorteilen zur Erlangung des Einverständnisses einer Person, die die Kontrolle über eine andere Person hat, zum Zwecke der Ausbeutung.
Vorfall	Eine Klage oder Beschwerde, die im Rahmen eines förmlichen Verfahrens bei dem Unternehmen oder den zuständigen Behörden eingegangen ist, oder ein Fall der Nichteinhaltung, den das Unternehmen im Rahmen etablierter Verfahren festgestellt hat. Etablierte Verfahren zur Feststellung von Nichteinhaltungen können Prüfungen des Managementsystems, formelle Überwachungsprogramme oder Beschwerdemechanismen umfassen.
Indirekte Treibhausgasemissionen (Scope 2)	Indirekte Treibhausgasemissionen sind Emissionen, die infolge der Tätigkeiten des Unternehmens entstehen, aber an Quellen, die sich im Eigentum oder unter der Kontrolle eines anderen Unternehmens befinden. Scope-2-Treibhausgasemissionen sind indirekte Emissionen aus der Erzeugung von erworbener/m oder erhaltener/m Elektrizität, Wärme, Dampf oder Kühlung, die/den das Unternehmen verbraucht.
Auswirkungen	Der Begriff bezieht sich auf die Auswirkungen, die eine Organisation aufgrund ihrer Tätigkeiten oder Geschäftsbeziehungen auf die Wirtschaft, die Umwelt und die Menschen hat oder haben könnte, einschließlich der Auswirkungen auf ihre Menschenrechte. Die Auswirkungen können tatsächlich oder potenziell, negativ oder positiv, kurz- oder langfristig, beabsichtigt oder unbeabsichtigt, direkt oder indirekt sowie umkehrbar oder unumkehrbar sein. Diese Auswirkungen geben den negativen oder positiven Beitrag der Organisation zur nachhaltigen Entwicklung an. Die Auswirkungen auf die Wirtschaft, die Umwelt und die Menschen sind miteinander verknüpft. Die Auswirkungen der Organisation auf die Umwelt beziehen sich auf die Auswirkungen auf lebende Organismen und nichtlebende Elemente, einschließlich Luft, Land, Wasser und Ökosysteme. Eine Organisation kann Auswirkungen auf die Umwelt haben, z. B. durch ihre Nutzung von Energie, Land, Wasser und anderen natürlichen Ressourcen. Die Auswirkungen der Organisation auf Menschen beziehen sich auf die Auswirkungen auf Einzelpersonen und Gruppen wie Gemeinschaften, schutzbedürftige Gruppen oder die Gesellschaft. Dazu gehören auch die Auswirkungen der Organisation auf die Menschenrechte. Eine Organisation kann sich beispielsweise durch ihre Beschäftigungspraxis (z. B. die den Beschäftigten

Begriff	Definition
	gezahlten Löhne), ihre Lieferkette (z. B. die Arbeitsbedingungen der Arbeitskräfte von Zulieferern) und ihre Produkte und Dienstleistungen (z. B. ihre Sicherheit oder Zugänglichkeit) auf die Menschen auswirken.
Flächennutzung / Landnutzungsänderung	„Flächennutzung“ bezieht sich auf die menschliche Nutzung einer spezifischen Fläche für einen bestimmten Zweck (beispielsweise als Wohngebiet, für die Landwirtschaft, zur Erholung, zu industriellen Zwecken usw.). Sie wird durch die Bodenbedeckung (Gras, Asphalt, Bäume, unbewachsener Boden, Wasser usw.) beeinflusst. „Landnutzungsänderung“ bezieht sich auf eine veränderte Nutzung oder Bewirtschaftung von Land durch Menschen, wodurch sich auch die Landbedeckung ändern kann.
Standortbezogene Scope-2-Emissionen	Emissionen aus Elektrizität, Wärme, Dampf oder Kühlung, die/den das Bericht erstattende Unternehmen erwirbt oder erhält und verbraucht, berechnet nach der standortbezogenen „Zuweisungsmethode“, bei der die Erzeugeremissionen den Endnutzern zugewiesen werden. Sie spiegeln die durchschnittliche Emissionsintensität der Netze wider, in denen der Energieverbrauch stattfindet, und beruhen hauptsächlich auf Daten zu den durchschnittlichen Emissionsfaktoren des Netzes. Typische Quellen von Scope-2-Emissionen sind alle Betriebseinrichtungen, die Elektrizität (Elektromotoren, Beleuchtung, Gebäude usw.), Wärme (Heizung in industriellen Prozessen, Gebäuden usw.), Dampf (industrielle Prozesse) oder Kälte (industrielle Prozesse, Gebäude usw.) verbrauchen.
Naturnahe Fläche	„Naturnahe Flächen“ bezeichnen Bereiche, die in erster Linie der Erhaltung oder Wiederherstellung der Natur dienen. Sie können sich auf dem Gelände des Standorts befinden und Elemente wie Dächer, Fassaden oder Wasserableitungssysteme umfassen, die zur Förderung der Biodiversität konzipiert wurden. Naturnahe Flächen können sich auch abseits des Standorts der Organisation befinden, sofern sie im Eigentum der Organisation stehen oder von dieser bewirtschaftet werden und in erster Linie der Förderung der Biodiversität dienen.
In der Nähe von (Gebiet mit schutzbedürftiger Biodiversität)	Im Kontext von „B5 – Biodiversität“ bezieht sich „in der Nähe von“ auf ein Gebiet, das sich mit einem Gebiet mit schutzbedürftiger Biodiversität (teilweise) überschneidet oder an ein solches angrenzt.
Arbeitskräfte des Unternehmens	Arbeitskräfte, die in einem Arbeitsverhältnis mit dem Unternehmen stehen („Beschäftigte“) und Fremdarbeitskräfte, bei denen es sich entweder um Einzelunternehmer handelt, die dem Unternehmen Arbeitskräfte zur Verfügung stellen („Selbstständige“), oder Personen, die von Unternehmen zur Verfügung gestellt werden, die in erster Linie Tätigkeiten im Bereich der „Vermittlung und Überlassung von Arbeitskräften“ ausüben (NACE-Code O78).
Entgelt	Die üblichen Grund- oder Mindestlöhne und -gehälter sowie alle sonstigen Vergütungen, die ein Arbeitgeber aufgrund des Dienstverhältnisses einem Arbeitnehmer unmittelbar oder mittelbar („ergänzende oder variable Bestandteile“) als Geld- oder Sachleistung zahlt. „Entgelthöhe“ bezeichnet das Bruttojahresentgelt und das entsprechende Bruttostundenentgelt. „Median-Entgelthöhe“ bezeichnet die Entgelthöhe, von der aus die Zahl der Beschäftigten, die mehr verdienen, gleich groß ist wie die der Beschäftigten, die weniger verdienen.
Richtlinie	Eine Reihe oder ein Rahmen von allgemeinen Zielen und Managementprinzipien, die das Unternehmen für die Entscheidungsfindung nutzt. Die Strategie oder die Managemententscheidungen des Unternehmens in Bezug auf einen Nachhaltigkeitsaspekt werden im Rahmen einer Unternehmensrichtlinie

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Begriff	Definition
	umgesetzt. Jede Richtlinie unterliegt der Verantwortung einer oder mehrerer definierter Personen, hat einen festgelegten Anwendungsbereich und umfasst ein oder mehrere Ziele (gegebenenfalls in Verbindung mit messbaren Zielen). Eine Richtlinie wird mittels Maßnahmen oder Aktionsplänen umgesetzt. Beispielsweise haben Unternehmen mit geringeren Ressourcen möglicherweise nur wenige (oder gar keine) Richtlinien schriftlich niedergelegt, was aber nicht heißen muss, dass sie über keine Richtlinien verfügen. Hat das Unternehmen noch keine Richtlinie förmlich festgelegt, aber Maßnahmen durchgeführt oder Ziele festgelegt, mit denen Nachhaltigkeitsaspekte behandelt werden sollen, gibt es diese an.
Radioaktive Abfälle	Jede Art von radioaktivem Material in gasförmiger, flüssiger oder fester Form, für das eine Weiterverwendung nicht vorgesehen ist, wie in Artikel 3 Nummer 7 der Richtlinie 2011/70/Euratom des Rates[8] definiert.
Meldepflichtiger Arbeitsunfall / meldepflichtige arbeitsbedingte Verletzung oder Erkrankung	Ein Arbeitsunfall ist ein Ereignis, das zu einer körperlichen oder geistigen Schädigung und damit zu einer Verletzung oder Erkrankung führt und das während der Ausübung einer beruflichen Tätigkeit oder während der Arbeitszeit eintritt. „Meldepflichtig“ bedeutet, dass die Diagnose von einem Arzt oder einem anderen zugelassenen Angehörigen der Gesundheitsberufe zu stellen ist. Arbeitsbedingte Verletzungen oder Erkrankungen können zu Folgendem führen: Tod, Arbeitsunfähigkeitstage, eingeschränkte Arbeitsfähigkeit oder Versetzung an einen anderen Arbeitsplatz, medizinische Behandlung über die Erste Hilfe hinaus oder Verlust des Bewusstseins. Verletzungen, die keine über die Erste Hilfe hinausgehende medizinische Behandlung erfordern, sind in der Regel nicht meldepflichtig.
Recycling	Ein Verwertungsverfahren, durch das Abfallmaterialien zu Erzeugnissen, Materialien oder Stoffen entweder für den ursprünglichen Zweck oder für andere Zwecke aufbereitet werden. Es schließt die Aufbereitung organischer Materialien ein, aber nicht die energetische Verwertung und die Aufbereitung zu Materialien, die für die Verwendung als Brennstoff oder zur Verfüllung bestimmt sind.
Erneuerbare Energie	Energie aus erneuerbaren, nichtfossilen Energiequellen, das heißt Wind, Sonne (Solarthermie und Fotovoltaik), geothermische Energie, Umgebungsenergie, Gezeiten-, Wellen- und sonstige Meeresenergie, Wasserkraft, und Energie aus Biomasse, Deponiegas, Klär- und Biogas[9].
Versiegelte Fläche	Eine versiegelte Fläche ist eine Fläche, auf der der ursprüngliche Boden abgedeckt wurde (z. B. Straßen), wodurch dieser undurchlässig wird. Diese Undurchlässigkeit kann Auswirkungen auf die Umwelt haben.
Vertrauliche Informationen	Vertrauliche Informationen im Sinne der Verordnung (EU) 2021/697 des Europäischen Parlaments und des Rates vom 29. April 2021 zur Einrichtung des Europäischen Verteidigungsfonds. Der Begriff „vertrauliche Informationen“ bezeichnet Informationen und Daten, einschließlich Verschlusssachen, die aufgrund von Verpflichtungen gemäß dem Unionsrecht oder dem nationalen Recht zum Schutz der Privatsphäre oder der Sicherheit einer natürlichen oder juristischen Person vor unbefugtem Zugriff oder

[8] Richtlinie 2011/70/Euratom des Rates vom 19. Juli 2011 über einen Gemeinschaftsrahmen für die verantwortungsvolle und sichere Entsorgung abgebrannter Brennelemente und radioaktiver Abfälle.

[9] Artikel 2 Nummer 1 der Richtlinie (EU) 2018/2001 des Europäischen Parlaments und des Rates vom 11. Dezember 2018 zur Förderung der Nutzung von Energie aus erneuerbaren Quellen (ABl. L 328 vom 21.12.2018, S. 82).

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Begriff	Definition
	unbefugter Weitergabe zu schützen sind.
Standort	Der Ort, an dem sich eine oder mehrere physische Anlagen befinden. Gibt es mehr als eine physische Anlage desselben oder verschiedener Eigentümer oder Betreiber und werden bestimmte Infrastrukturen und Einrichtungen gemeinsam genutzt, kann das gesamte Gebiet, in dem sich die physische Anlage befindet, einen Standort darstellen.
Ziele	Messbare, ergebnisorientierte und terminierte Zielsetzungen, die das KMU in Bezug auf Nachhaltigkeitsaspekte erreichen will. Sie können vom KMU freiwillig festgelegt werden oder sich aus rechtlichen Anforderungen an das Unternehmen ergeben.
Zeithorizonte	Bei der Erstellung seines Nachhaltigkeitsberichts bezieht sich das Unternehmen auf folgende Zeithorizonte: (a) kurzfristiger Zeithorizont: ein Jahr, (b) mittelfristiger Zeithorizont: zwei bis fünf Jahre und (c) langfristiger Zeithorizont: mehr als fünf Jahre.
Schulung(en)	Initiativen, die das Unternehmen zur Erhaltung und/oder Verbesserung der Fähigkeiten und Kenntnisse seiner eigenen Arbeitskräfte ergreift. Dies kann verschiedene Methoden umfassen, z. B. Schulungen vor Ort und Online-Schulungen.
Wertschöpfungskette	Das gesamte Spektrum der Tätigkeiten, Ressourcen und Beziehungen im Zusammenhang mit dem Geschäftsmodell des Unternehmens und dem externen Umfeld, in dem es tätig ist. Eine Wertschöpfungskette umfasst die Tätigkeiten, Ressourcen und Beziehungen, die das Unternehmen nutzt und auf die es angewiesen ist, um seine Produkte oder Dienstleistungen von der Konzeption über die Lieferung und den Verbrauch bis zum Ende der Lebensdauer zu gestalten. Zu den einschlägigen Tätigkeiten, Ressourcen und Beziehungen gehören Folgende: a) diejenigen im Rahmen der eigenen Geschäftstätigkeit des Unternehmens, z. B. Personalwesen, b) diejenigen entlang seiner Liefer-, Vermarktungs- und Vertriebskanäle, z. B. Beschaffung von Materialien und Dienstleistungen sowie Verkauf und Lieferung von Produkten und Dienstleistungen, und c) das finanzielle, geografische, geopolitische und regulatorische Umfeld, in dem das Unternehmen tätig ist. Die Wertschöpfungskette umfasst Akteure, die dem Unternehmen vor- und nachgelagert sind. Ein vorgelagerter Akteur bietet Produkte oder Dienstleistungen an, die bei der Entwicklung der eigenen Produkte oder Dienstleistungen des Unternehmens verwendet werden (z. B. Lieferanten). Betriebe, die dem Unternehmen nachgelagert sind, erhalten Produkte oder Dienstleistungen von dem Unternehmen (z. B. Vertreiber, Kunden).
Lohn	Bruttolohn ohne variable Komponenten wie Überstunden und Anreizvergütung und ohne Zulagen, sofern sie nicht garantiert sind.
Wasserverbrauch	Die Menge an Wasser, das im Laufe des Berichtszeitraums in die Systemgrenzen des Unternehmens (oder der Anlage) eingebracht und nicht in die Wasserumwelt zurückgeführt oder an Dritte weitergeleitet wird.
Wasserentnahme	Die Summe des Wassers, das während des Berichtszeitraums aus allen Quellen und für alle Verwendungszwecke in die Systemgrenzen des Unternehmens eingebracht wurde.

Begriff	Definition
Arbeitskraft in der Wertschöpfungskette	Eine Person, die in der Wertschöpfungskette des Unternehmens tätig ist, unabhängig vom Bestehen oder der Art einer vertraglichen Beziehung zu dem Unternehmen. Die ESRS decken alle Arbeitskräfte in der vor- und nachgelagerten Wertschöpfungskette des Unternehmens ab, auf die das Unternehmen wesentliche Auswirkungen hat oder haben kann. Dies schließt Auswirkungen ein, die mit den eigenen Tätigkeiten und der Wertschöpfungskette des Unternehmens verbunden sind, auch durch seine Produkte oder Dienstleistungen sowie durch seine Geschäftsbeziehungen. Dazu gehören alle Arbeitskräfte, die nicht den „Arbeitskräften des Unternehmens“ zuzurechnen sind (die „Arbeitskräfte des Unternehmens“ umfassen sowohl Personen, die in einem Arbeitsverhältnis mit dem Unternehmen stehen („Beschäftigte“), als auch Fremdarbeitskräfte, bei denen es sich entweder um Personen handelt, die mit dem Unternehmen einen Vertrag über die Erbringung von Arbeitsleistungen geschlossen haben („Selbstständige“), oder Personen, die von Unternehmen bereitgestellt werden, die in erster Linie im Bereich der Vermittlung und Überlassung von Arbeitskräften tätig sind (NACE-Code O78).

Anlage B: Liste möglicher Nachhaltigkeitsaspekte

Die nachstehende Anlage ist integraler Bestandteil dieses Standards und enthält eine Liste möglicher Nachhaltigkeitsaspekte.

Thema	Nachhaltigkeitsaspekt: Unterthema	Nachhaltigkeitsaspekt: Unter-Unterthema
Klimawandel	– Anpassung an den Klimawandel – Klimaschutz – Energie	
Umwelt-verschmutzung	– Luftverschmutzung – Wasserverschmutzung – Bodenverschmutzung – Verschmutzung von lebenden Organismen und Nahrungsressourcen – Besorgniserregende Stoffe – Besonders besorgniserregende Stoffe – Mikroplastik	
Wasser- und Meeres-ressourcen	– Wasser – Meeresressourcen	– Wasserverbrauch – Wasserentnahme – Ableitung von Wasser – Ableitung von Wasser in die Ozeane – Gewinnung und Nutzung von Meeresressourcen
Biodiversität und Ökosysteme	– Direkte Ursachen des Biodiversitätsverlusts	– Klimawandel – Landnutzungsänderungen, Süßwasser- und Meeresnutzungsänderungen – Direkte Ausbeutung – Invasive gebietsfremde Arten – Umweltverschmutzung – Sonstiges
	– Auswirkungen auf den Zustand der Arten	– Beispiele: – Populationsgröße von Arten – Globales Ausrottungsrisiko von Arten
	– Auswirkungen auf den Umfang und den Zustand von Ökosystemen	– Beispiele: – Landdegradation – Wüstenbildung – Bodenversiegelung
	– Auswirkungen und Abhängigkeiten von Ökosystemdienstleistungen	
Kreislauf-wirtschaft	– Ressourcenzuflüsse, einschließlich Ressourcennutzung – Ressourcenabflüsse im Zusammenhang mit Produkten und Dienstleistungen – Abfälle	
Arbeitskräfte des Unternehmens	– Arbeitsbedingungen	– Sichere Beschäftigung – Arbeitszeit – Angemessene Entlohnung – Sozialer Dialog

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Thema	Nachhaltigkeitsaspekt: Unterthema	Nachhaltigkeitsaspekt: Unter-Unterthema
		– Vereinigungsfreiheit, Existenz von Betriebsräten und Rechte der Arbeitnehmer auf Information, Anhörung und Mitbestimmung – Tarifverhandlungen, einschließlich der Quote der durch Tarifverträge abgedeckten Arbeitskräften – Vereinbarkeit von Berufs- und Privatleben – Gesundheitsschutz und Sicherheit
	– Gleichbehandlung und Chancengleichheit für alle	– Gleichstellung der Geschlechter und gleicher Lohn für gleiche Arbeit – Schulungen und Kompetenzentwicklung – Beschäftigung und Inklusion von Menschen mit Behinderungen – Maßnahmen gegen Gewalt und Belästigung am Arbeitsplatz – Vielfalt
	– Sonstige arbeitsbezogene Rechte	– Kinderarbeit – Zwangsarbeit – Angemessene Unterbringung – Privatsphäre
Arbeitskräfte in der Wertschöpfungskette	– Arbeitsbedingungen	– Sichere Beschäftigung – Arbeitszeit – Angemessene Entlohnung – Sozialer Dialog – Vereinigungsfreiheit, einschließlich der Existenz von Betriebsräten – Tarifverhandlungen – Vereinbarkeit von Berufs- und Privatleben – Gesundheitsschutz und Sicherheit
	– Gleichbehandlung und Chancengleichheit für alle	– Gleichstellung der Geschlechter und gleicher Lohn für gleiche Arbeit – Schulungen und Kompetenzentwicklung – Beschäftigung und Inklusion von Menschen mit Behinderungen – Maßnahmen gegen Gewalt und Belästigung am Arbeitsplatz – Vielfalt
	– Sonstige arbeitsbezogene Rechte	– Kinderarbeit – Zwangsarbeit – Angemessene Unterbringung – Wasser- und Sanitäreinrichtungen – Privatsphäre
Betroffene Gemeinschaften	– Wirtschaftliche, soziale und kulturelle Rechte von Gemeinschaften	– Angemessene Unterbringung – Angemessene Ernährung – Wasser- und Sanitäreinrichtungen – Bodenbezogene Auswirkungen

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Thema	**Nachhaltigkeitsaspekt: Unterthema**	**Nachhaltigkeitsaspekt: Unter-Unterthema**
		– Sicherheitsbezogene Auswirkungen
	– Bürgerrechte und politische Rechte von Gemeinschaften	– Meinungsfreiheit – Versammlungsfreiheit – Auswirkungen auf Menschenrechtsverteidiger
	– Rechte indigener Gemeinschaften	– Freiwillige und in Kenntnis der Sachlage erteilte vorherige Zustimmung – Selbstbestimmung – Kulturelle Rechte
Verbraucher und Endnutzer	– Informationsbezogene Auswirkungen für Verbraucher und/oder Endnutzer	– Privatsphäre – Meinungsfreiheit – Zugang zu (hochwertigen) Informationen
	– Persönliche Sicherheit von Verbrauchern und/oder Endnutzern	– Gesundheitsschutz und Sicherheit – Persönliche Sicherheit – Kinderschutz
	– Soziale Inklusion von Verbrauchern und/oder Endnutzern	– Nichtdiskriminierung – Zugang zu Produkten und Dienstleistungen – Verantwortliche Vermarktungspraktiken
Unternehmens-politik	– Unternehmenskultur – Schutz von Hinweisgebern (Whistleblowers) – Tierwohl – Politisches Engagement – Management der Beziehungen zu Lieferanten, einschließlich Zahlungspraktiken	
	– Korruption und Bestechung	– Vermeidung und Aufdeckung einschließlich Schulung – Vorfälle

Anlage C: Hintergrundinformationen für Finanzmarktteilnehmer, die die nach diesem Standard erstellten Informationen nutzen (Abgleich mit anderen EU-Vorschriften)

66. Diese Anlage ist für die Nutzer des Nachhaltigkeitsberichts relevant. Die nachstehende Tabelle veranschaulicht die Datenpunkte für ein nachhaltiges Finanzwesen, die in verschiedenen Modulen dieses Standards enthalten sind und den Anforderungen verschiedener Nutzertypen (Banken, Investoren, große Unternehmen) entsprechen.

67. In der Spalte „Angabepflicht – Nummer und Bezeichnung“ sind die Angaben aufgeführt, die in den verschiedenen Modulen (d. h. dem Basismodul und dem Zusatzmodul) enthalten sind und bei denen es sich um Datenpunkte für ein nachhaltiges Finanzwesen handelt. In der Spalte „SFDR Tabelle 1 und/oder EBA Säule 3 und/oder Benchmark-Verordnung“ wird veranschaulicht, wie diese Angaben mit den genannten Rechtsvorschriften zusammenhängen, die für die Nutzer des Nachhaltigkeitsberichts (Banken, andere Investoren) relevant sind.

<table>
<tr><th>Thema: Umwelt / Soziales / Governance</th><th>Angabepflicht – Nummer und Bezeichnung</th><th>SFDR Tabelle 1
und/oder
EBA Säule 3
und/oder
Benchmark-Verordnung</th></tr>
<tr><td colspan="3">Basismodul</td></tr>
<tr><td>Allgemeine Angaben</td><td>B1 – Grundlagen für die Erstellung
Das Unternehmen gibt Folgendes an:
vii) Geoposition von Standorten, die das Unternehmen besitzt, gepachtet hat oder bewirtschaftet.</td><td>EBA Säule 3[10]</td></tr>
<tr><td>Umwelt</td><td>B3 – Energie und Treibhausgasemissionen
Das Unternehmen legt seinen Gesamtenergieverbrauch in MWh offen und schlüsselt die Angaben entsprechend der nachstehenden Tabelle auf, wenn es die für eine solche Aufschlüsselung erforderlichen Informationen beschaffen kann:
<table>
<tr><th></th><th>Erneuerbar</th><th>Nicht erneuerbar</th><th>Insgesamt</th></tr>
<tr><td>Strom (wie in den Rechnungen der Versorgungsunternehmen angegeben)</td><td></td><td></td><td></td></tr>
<tr><td>Kraft-/Brennstoffe</td><td></td><td></td><td></td></tr>
</table></td><td>SFDR[11]</td></tr>
</table>

[10] Diese Angabepflicht steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission – Meldebogen 5: Anlagebuch – Indikatoren für potenzielle physische Risiken aus dem Klimawandel: Risikopositionen mit physischem Risiko.

[11] Anhang I Tabelle 1 der Verordnung (EU) 2019/2088 (SFDR), verpflichtender Indikator Nr. 5 („Anteil des Energieverbrauchs und der Energieerzeugung aus nicht erneuerbaren Energiequellen“).

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Umwelt	**B3 – Energie und Treibhausgasemissionen** Das Unternehmen gibt seine geschätzten ***Treibhausgas-(THG-)Bruttoemissionen*** in Tonnen CO_2-Äquivalent (tCO_2eq) nach den Festlegungen des Unternehmensstandards des THG-Protokolls (GHG Protocol, Corporate Standard) (Version 2004) an, einschließlich (a) der Scope-1-Treibhausgasemissionen in tCO_2eq (aus Quellen, die sich im Eigentum oder unter der Kontrolle des Unternehmens befinden); und (b) der standortbezogenen Scope-2-Emissionen in tCO_2eq (d. h. Emissionen aus der Erzeugung erworbener Energie wie Elektrizität, Wärme, Dampf oder Kühlung).	**SFDR**[12] **Benchmark**[13]
Umwelt	**B3 – Energie und Treibhausgasemissionen** Das Unternehmen gibt seine Treibhausgasintensität an, die berechnet wird, indem die unter Nummer 30 angegebenen „THG-Gesamtemissionen“ durch die unter Nummer 24 Buchstabe e Ziffer iv angegebenen „Umsatzerlöse (in Geldeinheiten)“ geteilt werden.	**SFDR**[14] **Benchmark**[15]
Umwelt	**B4 – Luft-, Wasser- und Bodenverschmutzung** Ist das Unternehmen aufgrund rechtlicher oder sonstiger nationaler Vorschriften bereits verpflichtet, den zuständigen Behörden seine Schadstoffemissionen zu melden, oder meldet es diese Emissionen freiwillig im Rahmen eines Umweltmanagementsystems, so gibt es die Schadstoffe, die es im Rahmen seiner eigenen Tätigkeiten in Luft, Wasser und Boden emittiert, mit der jeweiligen Menge jedes Schadstoffs an. Sind diese Informationen bereits öffentlich zugänglich, kann das Unternehmen alternativ auf das Dokument verweisen, in dem sie enthalten sind, z. B. durch Angabe des entsprechenden URL-Links oder durch Einbettung eines Hyperlinks.	**SFDR**[16]
Umwelt	**B5 – Biodiversität** Das Unternehmen gibt die Anzahl und die Fläche (in Hektar) der Standorte an, die es in oder in der Nähe von einem Gebiet mit schutzbedürftiger Biodiversität besitzt, gepachtet hat oder bewirtschaftet.	**SFDR**[17]

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[12] Anhang I Tabelle 1 der Verordnung (EU) 2019/2088 (SFDR), verpflichtende Indikatoren Nr. 1 und Nr. 2 („THG-Emissionen“; CO_2-Fußabdruck“).

[13] Artikel 5 Absatz 1, Artikel 6 und Artikel 8 Absatz 1 der Verordnung (EU) 2020/1816 (Benchmark-Verordnung).

[14] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem verpflichtenden Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 3 in Anhang I Tabelle 1 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („THG-Emissionsintensität der Unternehmen, in die investiert wird“)) abgeleitet werden.

[15] Diese Informationen stehen im Einklang mit Artikel 8 Absatz 1 der Delegierten Verordnung (EU) 2020/1818 der Kommission (Verordnung über Referenzwerte für den klimabedingten Wandel).

[16] Verordnung (EU) 2019/2088 (SFDR), da abgeleitet von a) einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen gemäß dem Indikator Nr. 2 in Anhang I Tabelle 2 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Emissionen von Luftschadstoffen“); b) Indikator Nr. 8 in Anhang I Tabelle 1 („Emissionen in Wasser“); c) Indikator Nr. 1 in Anhang I Tabelle 2 („Emissionen von anorganischen Schadstoffen“) und d) Indikator Nr. 3 in Anhang I Tabelle 2 („Emissionen ozonabbauender Stoffe“).

[17] Anhang I Tabelle 1 der Verordnung (EU) 2019/2088 (SFDR), verpflichtender Indikator Nr. 7 („Tätigkeiten, die sich nachteilig auf Gebiete mit schutzbedürftiger Biodiversität auswirken“).

Umwelt	**B7 – Ressourcennutzung, Kreislaufwirtschaft und Abfallbewirtschaftung** Das Unternehmen gibt Folgendes an: (a) das jährliche Gesamtabfallaufkommen, aufgeschlüsselt nach Art (nicht gefährlich und gefährlich),	**SFDR**[18]
Soziales	**B9 – Arbeitskräfte – Gesundheitsschutz und Sicherheit** Das Unternehmen gibt in Bezug auf seine ***Beschäftigten*** Folgendes an: (a) die Zahl und die Quote der ***meldepflichtigen Arbeitsunfälle***, (b) die Zahl der Todesfälle infolge arbeitsbedingter Verletzungen und arbeitsbedingter Erkrankungen.	**SFDR**[19] **Benchmark**[20]
Soziales	**B10 – Arbeitskräfte – Vergütung, Tarifverhandlungen und Schulung** Das Unternehmen gibt Folgendes an: (b) das prozentuale Entgeltgefälle zwischen weiblichen und männlichen ***Beschäftigten***. Das Unternehmen kann diese Angabe auslassen, wenn seine Beschäftigtenzahl unter 150 liegt, wobei zu beachten ist, dass dieser Schwellenwert ab dem 7. Juni 2031 auf 100 Beschäftigte gesenkt wird,	**SFDR**[21]
Governance	**B11 – Verurteilungen und Geldstrafen wegen Korruption und Bestechung** Falls im Berichtszeitraum wegen Verstößen gegen Rechtsvorschriften zur Bekämpfung von Korruption und Bestechung Verurteilungen erfolgt sind oder Geldstrafen verhängt wurden, gibt das Unternehmen die Anzahl der Verurteilungen bzw. den Gesamtbetrag der Geldstrafen an.	**Benchmark**[22]
Zusatzmodul		

[18] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem verpflichtenden Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 9 in Anhang I Tabelle 1 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Anteil gefährlicher und radioaktiver Abfälle")) abgeleitet werden.

[19] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der **Verordnung (EU) 2019/2088** unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (**Indikator Nr. 2** in Anhang I **Tabelle 3** der entsprechenden Delegierten Verordnung in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Unfallquote")) abgeleitet werden.

[20] Referenzwert-Administratoren müssen ESG-Faktoren, die der Verordnung (EU) 2020/1816 unterliegen, gemäß dem Indikator „Gewichtetes durchschnittliches Verhältnis von Unfällen, Verletzungen und Todesfällen" in Anhang II Abschnitte 1 und 2 offenlegen.

[21] Anhang I Tabelle 1 der Verordnung (EU) 2019/2088 (SFDR), verpflichtender Indikator Nr. 12 („Unbereinigtes geschlechtsspezifisches Verdienstgefälle") und Anhang II Abschnitte 1 und 2 der Verordnung (EU) 2020/1816 (Benchmark-Verordnung), Indikator „Gewichtetes durchschnittliches Gehaltsgefälle zwischen Frauen und Männern".

[22] Anhang II Abschnitte 1 und 2 der Benchmark-Verordnung (EU) 2020/1816, Indikator „Anzahl der Verurteilungen und Höhe der Geldstrafen für Verstöße gegen Korruptions- und Bestechungsvorschriften".

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Umwelt	**Erwägungen bei der Angabe von Treibhausgasemissionen unter B3 (Basismodul)** Gibt das Unternehmen bei der Berichterstattung über seine Scope-1- und Scope-2-Emissionen unternehmensspezifische Informationen über seine Scope-3-Emissionen an, so stellt es diese zusammen mit den unter B3 – Energie und Treibhausgasemissionen anzugebenden Informationen bereit.	**SFDR**[23] **Benchmark**[24]
Umwelt	**C3 – THG-Emissionsreduktionsziel** Hat das Unternehmen Ziele zur Reduktion der THG-Emissionen festgelegt, so gibt es diese in absoluten Werten für Scope-1- und Scope-2-Emissionen an. Im Einklang mit den Nummern 50 bis 53 und sofern das Unternehmen Ziele zur Reduktion der Scope-3-Emissionen festgelegt hat, gibt es auch Ziele für seine signifikanten Scope-3-Kategorien an. Insbesondere gibt es Folgendes an: (a) das Zieljahr und den dafür festgelegten Zielwert, (b) das Basisjahr und den Bezugswert für das Basisjahr, (c) die für die Ziele verwendeten Einheiten, (d) den Anteil der Scope-1-, Scope-2- und, falls offengelegt, der Scope-3-Emissionen, auf den sich das Ziel bezieht; (e) eine Auflistung der wesentlichen Maßnahmen, die das Unternehmen zur Erreichung seiner Ziele durchzuführen beabsichtigt. Ist ein Unternehmen in klimaintensiven Sektoren[25] tätig und hat einen Übergangsplan für den Klimaschutz angenommen, so kann es Informationen darüber vorlegen, mit denen u. a. erläutert wird, wie der Plan zur Verringerung der Treibhausgasemissionen beiträgt. Ist ein Unternehmen in klimaintensiven Sektoren tätig und hat keinen Übergangsplan für den Klimaschutz, so gibt es an, ob und gegebenenfalls wann es einen solchen Übergangsplan annehmen wird.	**SFDR**[26] **Benchmark**[27] **EBA Säule 3**[28] **Benchmark**[29]

[23] Anhang I Tabelle 1 der Verordnung (EU) 2019/2088 (SFDR), verpflichtende Indikatoren Nr. 1 und Nr. 2 („THG-Emissionen"; CO_2-Fußabdruck").

[24] Artikel 5 Absatz 1, Artikel 6 und Artikel 8 Absatz 1 der Verordnung (EU) 2020/1816 (Benchmark-Verordnung).

[25] Klimaintensive Sektoren sind die Sektoren, die in den NACE-Abschnitten A bis H und im NACE-Abschnitt M gemäß dem Anhang der Delegierten Verordnung (EU) 2023/137) aufgeführt sind.

[26] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 4 in Anhang I Tabelle 2 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Investitionen in Unternehmen ohne Initiativen zur Verringerung der CO_2-Emissionen")) abgeleitet werden.

[27] Diese Informationen stehen im Einklang mit Artikel 6 der Delegierten Verordnung (EU) 2020/1818 der Kommission (Verordnung über Referenzwerte für den klimabedingten Wandel).

[28] Diese Informationen stehen im Einklang mit Artikel 449a der Verordnung (EU) Nr. 575/2013; Durchführungsverordnung (EU) 2022/2453 der Kommission – Meldebogen 3: Anlagebuch – Übergangsrisiko im Zusammenhang mit dem Klimawandel: Angleichungskennzahlen.

[29] Diese Informationen stehen im Einklang mit Artikel 2 Absatz 1 der Verordnung (EU) 2021/1119 des Europäischen Parlaments und des Rates (EU-Klimagesetz) und mit Artikel 2 der Delegierten Verordnung (EU) 2020/1818 der Kommission (Verordnung über Referenzwerte für den klimabedingten Wandel).

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Umwelt	**C4 – Klimabedingte Risiken** Hat das Unternehmen klimabedingte Gefahren und klimabedingte Übergangsereignisse ermittelt, aus denen sich bei Bruttobetrachtung klimabedingte Risiken für das Unternehmen ergeben, gibt es Folgendes an: (a) eine kurze Beschreibung dieser klimabedingten Gefahren und klimabedingten Übergangsereignisse, (b) wie es die Exposition und Anfälligkeit seiner Vermögenswerte, Tätigkeiten und Wertschöpfungskette gegenüber diesen Gefahren und Übergangsereignissen bewertet hat, (c) die Zeithorizonte etwaiger ermittelter klimabedingter Gefahren und Übergangsereignisse, (d) ob es in Bezug auf klimabedingte Gefahren und Übergangsereignisse Maßnahmen zur Anpassung an den Klimawandel ergriffen hat. Das Unternehmen kann angeben, welche nachteiligen Auswirkungen auf seine finanzielle Leistungsfähigkeit oder seine Geschäftstätigkeit sich kurz-, mittel- oder langfristig aus den klimabedingten Risiken ergeben könnten und ob es die Risiken als hoch, mittel oder niedrig einschätzt.	**Benchmark**[30] **EBA Säule 3**[31]
Soziales	**C6 – Zusätzliche Informationen über die Arbeitskräfte des Unternehmens – Richtlinien für die Achtung der Menschenrechte und diesbezügliche Prozesse** Das Unternehmen beantwortet folgende Fragen: (a) Verfügt das Unternehmen über einen Verhaltenskodex oder Richtlinien für die Achtung der Menschenrechte bei seinen eigenen Arbeitskräften? (JA/NEIN) (b) Falls ja, sind folgende Aspekte abgedeckt: i. Kinderarbeit (JA/NEIN), ii. Zwangsarbeit (JA/NEIN), iii. Menschenhandel (JA/NEIN), iv. Diskriminierung (JA/NEIN), v. Unfallverhütung (JA/NEIN),	**Benchmark**[32] **SFDR**[33]

[30] Anhang II der Benchmark-Verordnung (EU) 2020/1816: Zu berücksichtigende Umweltfaktoren nach zugrunde liegendem Vermögenswert des Referenzwerts.

[31] EBA Säule 3: Technischer Durchführungsstandard (implementing technical standard – ITS) – Meldebogen 5: Anlagebuch – Indikatoren für potenzielle physische Risiken aus dem Klimawandel: Risikopositionen mit physischem Risiko; EBA Säule 3: ITS – Meldebogen 2: Anlagebuch – Übergangsrisiken im Zusammenhang mit dem Klimawandel: Durch Immobilien besicherte Darlehen – Energieeffizienz der Sicherheiten.

[32] Diese Informationen tragen zur Deckung des Bedarfs der Referenzwert-Administratoren bei, ESG-Faktoren im Rahmen der Verordnung (EU) 2020/1816 offenzulegen (Indikator „Risikoposition des Referenzwert-Portfolios gegenüber Unternehmen ohne Vorschriften zur Sorgfaltsprüfung in Bezug auf Fragen, die in den Konventionen 1 bis 8 der Internationalen Arbeitsorganisation behandelt werden“ in Anhang II Abschnitte 1 und 2).

[33] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem verpflichtendem Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 11 in Anhang I Tabelle 1 („Anteil der Investitionen in Unternehmen, in die investiert wird, die keine Richtlinien zur Überwachung der Einhaltung der UNGC-Grundsätze und der OECD-Leitsätze für multinationale Unternehmen oder keine Verfahren zur Bearbeitung von Beschwerden wegen Verstößen gegen die UNGC-Grundsätze und OECD-Leitsätze für multinationale Unternehmen eingerichtet haben“), Indikator Nr. 5 in Anhang I Tabelle 3 („Anteil der Investitionen in Unternehmen, in die investiert wird, die keine Verfahren zur Bearbeitung von Beschwerden im Zusammenhang mit Arbeitnehmerbelangen eingerichtet haben“) und Indikator Nr. 9 in Anhang I Tabelle 3 („Anteil der Investitionen in Unternehmen ohne Menschenrechtspolitik“) der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen) abgeleitet werden.

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	vi. Sonstiges? (JA/NEIN – falls ja, ausführen). Verfügt das Unternehmen über ein Verfahren zur Bearbeitung von Beschwerden der eigenen Arbeitskräfte? (JA/NEIN)	
Soziales	**C7 – Schwerwiegende Vorfälle im Zusammenhang mit Menschenrechten** Das Unternehmen beantwortet folgende Fragen: (a) Sind unter den Arbeitskräften des Unternehmens bestätigte Vorfälle im Zusammenhang mit Folgendem aufgetreten: i. Kinderarbeit (JA/NEIN), ii. Zwangsarbeit (JA/NEIN), iii. Menschenhandel (JA/NEIN), iv. Diskriminierung (JA/NEIN), v. Sonstiges? (JA/NEIN – falls ja, ausführen). (b) Falls ja, kann das Unternehmen die Maßnahmen beschreiben, die zur Behebung der aufgeführten Vorfälle ergriffen wurden. Sind dem Unternehmen bestätigte Vorfälle bekannt, an denen Arbeitskräfte in der Wertschöpfungskette, betroffene Gemeinschaften, Verbraucher und Endnutzer beteiligt sind? Falls ja, sind Einzelheiten anzugeben.	**SFDR**[34] **Benchmark**[35]
Governance	**C8 – Umsatzerlöse aus bestimmten Sektoren und Ausnahme von EU-Referenzwerten** Ist das Unternehmen in einem oder mehreren der folgenden Sektoren tätig, so gibt es die entsprechenden Umsatzerlöse in dem/den Sektor(en) an: (a) umstrittene Waffen (Antipersonenminen, Streumunition, chemische und biologische Waffen),	**SFDR**[36] **Benchmark**[37]

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[34] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem verpflichtendem und zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 10 in Anhang I Tabelle 1 und Indikator Nr. 14 in Anhang I Tabelle 3 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Verstöße gegen die UNGC-Grundsätze und gegen die Leitsätze der Organisation für wirtschaftliche Zusammenarbeit und Entwicklung (OECD) für multinationale Unternehmen“ und „Anzahl der Fälle von schwerwiegenden Menschenrechtsverletzungen und sonstigen Vorfällen“)) abgeleitet werden.

[35] Diese Informationen unterstützen den Bedarf der Referenzwert-Administratoren, ESG-Faktoren im Rahmen der Verordnung (EU) 2020/1816 offenzulegen, gemäß dem Indikator „Anzahl der Referenzwert-Bestandteile, die sozialen Verstößen ausgesetzt sind (absolute Zahl und relativer Anteil geteilt durch alle Referenzwert-Bestandteile), nach Maßgabe internationaler Verträge und Konventionen, der Grundsätze der Vereinten Nationen und, falls anwendbar, nationaler Rechtsvorschriften“ in Anhang II Abschnitte 1 und 2.

[36] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 14 in Anhang I Tabelle 1 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Exposition gegenüber umstrittenen Waffen (Antipersonenminen, Streumunition, chemische Waffen und biologische Waffen)“) abgeleitet werden.

[37] Artikel 12 Absatz 1 der Verordnung (EU) 2020/1818 über Referenzwerte für den klimabedingten Wandel: „Die Administratoren von Paris-abgestimmten EU-Referenzwerten schließen alle folgenden Unternehmen von diesen Referenzwerten aus: Unternehmen, die an Aktivitäten im Zusammenhang mit umstrittenen Waffen beteiligt sind“ und Benchmark-Verordnung (EU) 2020/1816, Anhang II: „Gewichteter durchschnittlicher Prozentsatz der Referenzwert-Bestandteile im Sektor der umstrittenen Waffen“.

	(b) Anbau und Produktion von Tabak,	**EBA Säule 3**[38] **Benchmark**[39]
	(c) fossile Brennstoffe (Kohle, Erdöl und Erdgas) (d. h. das Unternehmen erzielt Umsatzerlöse aus der Exploration, Förderung, Gewinnung, Herstellung, Verarbeitung, Lagerung, Raffination oder dem Vertrieb, einschließlich Transport, Lagerung und Handel, von fossilen Brennstoffen im Sinne des Artikels 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates), mit einer Aufschlüsselung der Erlöse aus Kohle, Erdöl und Erdgas,	**SFDR**[40] **EBA Säule 3**[41] **Benchmark**[42]
	(d) Herstellung von Chemikalien, wenn das Unternehmen ein Hersteller von Pestiziden und anderen agrochemischen Erzeugnissen ist.	**SFDR**[43] **EBA Säule 3**[44]
	Das Unternehmen gibt an, ob es von mit dem Übereinkommen von Paris-abgestimmten EU-Referenzwerten ausgenommen ist, wie in Anhang II Nummer 177 beschrieben.	**EBA Säule 3**[45] **Benchmark**[46]

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[38] EBA Säule 3: Meldebogen 1: Anlagebuch – Übergangsrisiken im Zusammenhang mit dem Klimawandel: Unternehmen, die Tabakerzeugnisse herstellen und nach Artikel 12 Absatz 1 Buchstaben d bis g und Artikel 12 Absatz 2 der Verordnung über Referenzwerte für den klimabedingten Wandel von den Paris-abgestimmten EU-Referenzwerten ausgeschlossen sind.

[39] Diese Informationen tragen zur Deckung des Bedarfs der Referenzwert-Administratoren bei, ESG-Faktoren nach Artikel 12 Absatz 1 Buchstabe b der Verordnung (EU) 2020/1818 sowie nach Anhang II der Benchmark-Verordnung (EU) 2020/1816: „Gewichteter durchschnittlicher Prozentsatz der Referenzwert-Bestandteile im Sektor Tabak“ offenzulegen.

[40] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 4 in Anhang I Tabelle 1 der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Risikopositionen gegenüber Unternehmen, die im Sektor fossiler Brennstoffe tätig sind“)) abgeleitet werden.

[41] EBA Säule 3: Meldebogen 1: Anlagebuch – Übergangsrisiken im Zusammenhang mit dem Klimawandel: Unternehmen, die im Bergbau und in der Gewinnung von Steinen und Erden tätig sind und nach Artikel 12 Absatz 1 Buchstaben d bis g und Artikel 12 Absatz 2 der Verordnung über Referenzwerte für den klimabedingten Wandel von den Paris-abgestimmten EU-Referenzwerten ausgeschlossen sind.

[42] Artikel 12 Absatz 1 der Verordnung (EU) 2020/1818 über Referenzwerte für den klimabedingten Wandel.

[43] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 9 in Anhang I Tabelle II der Delegierten Verordnung (EU) 2022/1288 der Kommission in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Investitionen in Unternehmen, die Chemikalien herstellen“)) abgeleitet werden.

[44] EBA Säule 3: Meldebogen 1: Anlagebuch – Übergangsrisiken im Zusammenhang mit dem Klimawandel: Unternehmen, die im Bergbau und in der Gewinnung von Steinen und Erden tätig sind und nach Artikel 12 Absatz 1 Buchstaben d bis g und Artikel 12 Absatz 2 der Verordnung über Referenzwerte für den klimabedingten Wandel von den Paris-abgestimmten EU-Referenzwerten ausgeschlossen sind.

[45] Diese Angabepflicht steht im Einklang mit den Anforderungen der Durchführungsverordnung (EU) 2022/2453 der Kommission (Meldebogen 1: Übergangsrisiko im Zusammenhang mit dem Klimawandel).

[46] Diese Angabepflicht steht im Einklang mit Artikel 12 Absatz 1 der Delegierten Verordnung (EU) 2020/1818 der Kommission (Verordnung über Referenzwerte für den klimabedingten Wandel.

Governance	**C9 – Geschlechtervielfalt im Leitungsorgan** Verfügt das Unternehmen über ein Leitungsorgan, gibt es das dort bestehende zahlenmäßige Verhältnis der Geschlechter an.	**SFDR**[47] **/ Benchmark**[48]

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[47] Diese Informationen tragen zur Deckung des Informationsbedarfs von Finanzmarktteilnehmern bei, die der Verordnung (EU) 2019/2088 unterliegen, da sie von einem zusätzlichen Indikator in Bezug auf die wichtigsten negativen Auswirkungen (Indikator Nr. 13 in Anhang I Tabelle 1 der Delegierten Verordnung (EU) 2022/1288 der Kommission vom 6. April 2022 zur Ergänzung der Verordnung (EU) 2019/2088 des Europäischen Parlaments und des Rates in Bezug auf Offenlegungsvorschriften für nachhaltige Investitionen („Geschlechtervielfalt in den Leitungs- und Kontrollorganen")) abgeleitet werden.

[48] Diese Informationen unterstützen den Bedarf der Referenzwert-Administratoren, ESG-Faktoren im Rahmen der Delegierten Verordnung (EU) 2020/1816 der Kommission vom 17. Juli 2020 zur Ergänzung der Verordnung (EU) 2016/1011 des Europäischen Parlaments und des Rates offenzulegen, wie durch den Indikator „Gewichtetes durchschnittliches Verhältnis von weiblichen zu männlichen Mitgliedern in Leitungsorganen" in Anhang II Abschnitte 1 und 2 festgelegt.

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KOMMISSION

Brüssel, den 30.7.2025
C(2025) 4984 final

ANNEX 2

ANHANG

der

Empfehlung der Kommission

für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

„Anhang II der EU-Empfehlung – Praktische Leitlinien“
Anhang II der Empfehlung der Kommission für einen Standard für die freiwillige Berichterstattung kleiner und mittlerer Unternehmen vom 30.07.2025 (46 Seiten, pdf)

https://ec.europa.eu/finance/docs/law/250730-recommendation-vsme-annex-2_de.pdf

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KOMMISSION

Brüssel, den 30.7.2025
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ANNEX 2

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für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen

Stand: 01.02.2026

ANHANG II

Praktische Leitlinien für die Anwendung des Standards für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen in Anhang I

Dieser Anhang enthält praktische Leitlinien für die Anwendung des in Anhang I festgelegten Standards für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen.

In diesen Leitlinien wird klargestellt, wie bestimmte, in dem genannten Standard enthaltene Angabepflichten anzuwenden sind. Unternehmen und anderen Interessengruppen wird darüber hinaus empfohlen, die von der EFRAG veröffentlichten Leitlinien zur Umsetzung der ESRS zu konsultieren.

Durch die Bereitstellung der Leitlinien in diesem Anhang beabsichtigt die Kommission, kleinen und mittleren Unternehmen die kosteneffiziente Erfüllung der Angabepflichten zu erleichtern und die Nutzbarkeit und Vergleichbarkeit der offengelegten Nachhaltigkeitsinformationen sicherzustellen. Durch mehr Klarheit und Sicherheit für Unternehmen werden diese Leitlinien zu dem von der Kommission verfolgten Ziel beitragen, die Anforderungen an die Nachhaltigkeitsberichterstattung zu vereinfachen und den mit der Nachhaltigkeitsberichterstattung verbundenen Verwaltungsaufwand für Unternehmen zu verringern.

Mit den Leitlinien in diesem Anhang werden die Bestimmungen der Kommissionsempfehlung und des in Anhang I dieser Empfehlung enthaltenen Standards für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen in keiner Weise erweitert oder ergänzt. Sie dienen lediglich dazu, Unternehmen bei der praktischen Umsetzung der einschlägigen Angabepflichten zu unterstützen.

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Basismodul: Leitlinien

1. Die in den folgenden Abschnitten enthaltenen Leitlinien sollen die Anwendung der Angabepflichten erleichtern, die in Anhang I Nummern 21 bis 43 der Empfehlung der Kommission für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen dargelegt sind.
2. Die nachstehenden Leitlinien sind als Teil eines Ökosystems vorgesehen, das auch die Entwicklung weiterer Unterstützungsleitlinien durch die EFRAG, weitere digitale Instrumente und Unterstützung bei der Umsetzung (Bildungstätigkeiten, Einbeziehung der Interessenträger) umfassen könnte, mit denen das Verständnis einiger der technischen Elemente der Leitlinien erleichtert wird.
3. Diese Leitlinien unterstützt Unternehmen, die das Basismodul anwenden möchten.

1.1. Leitlinien zum Basismodul – Allgemeine Informationen

B1 – Grundlagen für die Erstellung

4. Bei der Angabe der Rechtsform des Unternehmens entsprechend den nationalen Rechtsvorschriften nach Nummer 24 Buchstabe e Ziffer i kann das Unternehmen aus einer der folgenden Unternehmensstrukturen wählen:
   (a) Gesellschaft mit beschränkter Haftung
   (b) Personengesellschaft
   (c) Partnerschaftsgesellschaft
   (d) Genossenschaft
   (e) andere (bitte auf der Grundlage der länderspezifischen Vorschriften zu Rechtsformen erläutern).
5. Bei der Angabe des/der NACE-Code(s) des Unternehmens nach Nummer 24 Buchstabe e Ziffer ii ist auf die Statistische Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (Nomenclature statistique des Activités économiques dans la Communauté Européenne – NACE) Bezug zu nehmen. Die NACE-Codes bieten einen standardisierten Rahmen für die Klassifizierung von Wirtschaftstätigkeiten nach Wirtschaftszweigen und ermöglichen so Vergleichbarkeit und ein gemeinsames Verständnis zwischen den verschiedenen EU-Ländern.
6. NACE-Codes bestehen aus einer Ziffernfolge, die je nach dem Grad der Spezifität, mit dem die Wirtschaftstätigkeit identifiziert wird, zwischen 2 und 5 Ziffern lang ist. Die Liste der NACE-Codes ist im folgenden Dokument zu finden: Verordnung (EU) 2023/137.

Nr. Ebene	Identifikator	Beschreibung
1	Abschnitt	Die Abschnitte werden mit einem Buchstaben gekennzeichnet und bezeichnen 21 allgemeine Wirtschaftsbereiche wie Landwirtschaft, verarbeitendes Gewerbe oder Handel.

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2	Abteilung	Die Abteilung wird durch einen zweistelligen numerischen Code gekennzeichnet und bezeichnet einen bestimmten Wirtschaftszweig innerhalb des allgemeinen Wirtschaftsbereichs. Insgesamt gibt es 88 Abteilungen.
3	Gruppe	Die Gruppe wird durch einen dreistelligen numerischen Code (auch unter Berücksichtigung der beiden Ziffern für die Abteilung) gekennzeichnet und bezeichnet einen bestimmten Bereich innerhalb des Wirtschaftszweigs. Es gibt etwa 270 Gruppen.
4	Klasse	Die Klasse wird durch einen vierstelligen numerischen Code (unter Berücksichtigung der Ziffern für Abteilung und Gruppe) gekennzeichnet und bezeichnet eine spezifische Tätigkeit innerhalb der Gruppe. Es gibt etwa 450 Klassen.

7. Bei der Angabe der Zahl der ***Beschäftigten*** nach Nummer 24 Buchstabe e Ziffer v entsprechen Vollzeitäquivalente (VZÄ) der **Zahl der Vollzeitstellen in einem Unternehmen**. Sie **können berechnet werden, indem die geplante Arbeitszeit eines Beschäftigten (effektiv in einer Woche geleistete Gesamtarbeitsstunden) durch die vom Arbeitgeber für eine Vollzeitarbeitswoche festgelegte Arbeitszeit (von Vollzeitbeschäftigten geleistete Gesamtarbeitsstunden) geteilt wird**. Wenn ein Beschäftigter 25 Wochenstunden in einem Unternehmen arbeitet, in dem die Vollzeitwoche 40 Stunden beträgt, entspricht dies beispielsweise 0,625 VZÄ (d. h. 25/40 Stunden).
8. Die Beschäftigtenzahl ist die Gesamtzahl der Beschäftigten des Unternehmens, wobei entweder der Stand am Ende des Berichtszeitraums oder der über den Berichtszeitraum hinweg ermittelte Durchschnittswert angegeben wird.
9. Bei der Angabe des Landes der Hauptgeschäftstätigkeit und des Standorts der wesentlichen Vermögenswerte nach Nummer 24 Buchstabe e Ziffern vi und vii gibt das Unternehmen diese Informationen für jeden seiner ***Standorte*** entsprechend der nachstehenden Tabelle an:

Standorte	Anschrift	Postleitzahl	Ort	Land	Koordinaten (Geoposition)
Geschäftssitz (z. B.)					
Lager (z. B.)					
Industrieanlage (z. B.)					

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10. Die Geoposition eines Unternehmens dürfte für Interessengruppen ein wertvoller Datenpunkt sein, um die mit dem KMU verbundenen Chancen und Risiken zu bewerten, insbesondere in Bezug auf die Nachhaltigkeitsaspekte in den Bereichen ***Anpassung an den Klimawandel***, Wasser, Ökosysteme und Biodiversität.
11. Die Angabe der Geoposition erfolgt mithilfe von Flächenpunkten im Falle einzelner Einheiten bzw. Polygonpunkten, mit denen die Grenzen eines größeren, weniger einer Einheit ähnelnden ***Standorts***, z. B. eines landwirtschaftlichen Betriebs, eines Bergwerks oder einer Anlage, abgesteckt werden. Das Unternehmen kann auch ein Punktcluster angeben, um eine einfache Identifizierung des betreffenden Gebiets zu ermöglichen. Die Flächenpunkte sind als Koordinaten mit fünf Dezimalstellen anzugeben (z. B. 0° 00′ 0.036″).
12. In Bezug auf die Geoposition von ***Standorten***, die das Unternehmen besitzt, gepachtet hat oder bewirtschaftet, gibt das Unternehmen die in der Tabelle nach Nummer 73 aufgeführten Standortkoordinaten an. Das Unternehmen kann Webkartierungsinstrumente verwenden, um die Koordinaten der Standorte zu ermitteln, die es besitzt, gepachtet hat oder bewirtschaftet. Das Unternehmen kann auch geeignete Software-Tools oder Plattformen verwenden, um die Umgrenzung oder die Fläche größerer Standorte näher zu bestimmen.
13. Als Nachhaltigkeitszertifizierung nach Nummer 25 können eingetragene Umweltzeichen eines Kennzeichnungssystems auf EU-, nationaler oder internationaler Ebene angegeben werden, die die Haupttätigkeit eines KMU betreffen. Beispielsweise deckt das EU-Umweltzeichen bestimmte Produkte wie Textilien und Schuhe, Beläge (z. B. Bodenbeläge aus Holz), Reinigungs- und Körperpflegeprodukte, elektronische Geräte oder Möbel ab. Für weitere Informationen über die Produktgruppen des EU-Umweltzeichens kann das Unternehmen *EU Ecolabel Product Groups* und den *EU Ecolabel Product Catalogue*konsultieren.

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B2 – Verfahrensweisen, Richtlinien und künftige Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

14. Bei der Angabe von Datenpunkten zu B2 können Unternehmen die folgende Vorlage verwenden.

	Bestehen in Ihrem Unternehmen bereits nachhaltigkeitsbezogene Verfahrensweisen / Richtlinien / künftige Initiativen, die sich auf einen der folgenden Nachhaltigkeitsaspekte beziehen? [JA/NEIN]	Sind diese öffentlich zugänglich? [JA/NEIN]	Sind in Verbindung mit den Richtlinien Ziele festgelegt? [JA/NEIN]
Klimawandel			
Umweltverschmutzung			

Wasser- und Meeresressourcen			
Biodiversität und Ökosysteme			
Kreislaufwirtschaft			
Arbeitskräfte des Unternehmens			
Arbeitskräfte in der Wertschöpfungskette			
Betroffene Gemeinschaften			
Verbraucher und Endnutzer			
Unternehmenspolitik			

15. Handelt es sich bei dem Unternehmen um eine Genossenschaft, können Angaben gemacht werden zu

    (a) der wirksamen Beteiligung von Arbeitskräften, Nutzern oder anderen interessierten Parteien oder Gemeinschaften an der Governance,
    (b) den in der Empfehlung des Rates vom 29. September 2023 genannten finanziellen Investitionen in Kapital oder Vermögenswerte sozialwirtschaftlicher Einrichtungen (ausgenommen Spenden und Zuwendungen),
    (c) etwaigen Beschränkungen der Gewinnausschüttung im Zusammenhang mit dem gegenseitigen Charakter oder der Art der Tätigkeiten, die in Dienstleistungen von allgemeinem wirtschaftlichem Interesse (DAWI) bestehen.

Leitlinien im Zusammenhang mit den Arbeitskräften des Unternehmens, Arbeitskräften in der Wertschöpfungskette, betroffenen Gemeinschaften, Verbrauchern und Endnutzern

16. Zum besseren Verständnis der Nachhaltigkeitsaspekte in den Bereichen Soziales und Menschenrechte enthält Anhang B eine Liste möglicher Nachhaltigkeitsaspekte. Anhand dieser Liste könnte festgestellt werden, ob die Verfahrensweisen, Richtlinien oder künftigen Initiativen darauf ausgerichtet sind, umfassend gegen negative ***Auswirkungen*** auf die Menschenrechte vorzugehen, oder ob sie auf bestimmte betroffene Akteure beschränkt sind (z. B. auf Arbeitskräfte in der vorgelagerten ***Wertschöpfungskette***). In diesem Zusammenhang können Unternehmen auch angeben, ob sie über ein Verfahren zur Behandlung menschenrechtsbezogener Beschwerden verfügen.

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1.2. Leitlinien zum Basismodul – Umweltkennzahlen

B3 – Energie und Treibhausgasemissionen

Auswirkungen auf das Klima: Energieverbrauch und Treibhausgasemissionen

17. Unter den Nummern 29 und 30 erstattet das Unternehmen Bericht über seine ***Auswirkungen*** auf das Klima, indem es Informationen über seinen Energieverbrauch und seine ***Treibhausgasemissionen*** bereitstellt. Diese Leitlinien zu Angabe B3 stellen keinen zusätzlichen Datenpunkt zu den in den Nummern 29 (Energieverbrauch) und 30 (THG-Emissionen) beschriebenen Angaben dar, sondern geben vielmehr ein übergeordnetes Ziel für die Basisangabe B3 vor und liefern entsprechenden Kontext.

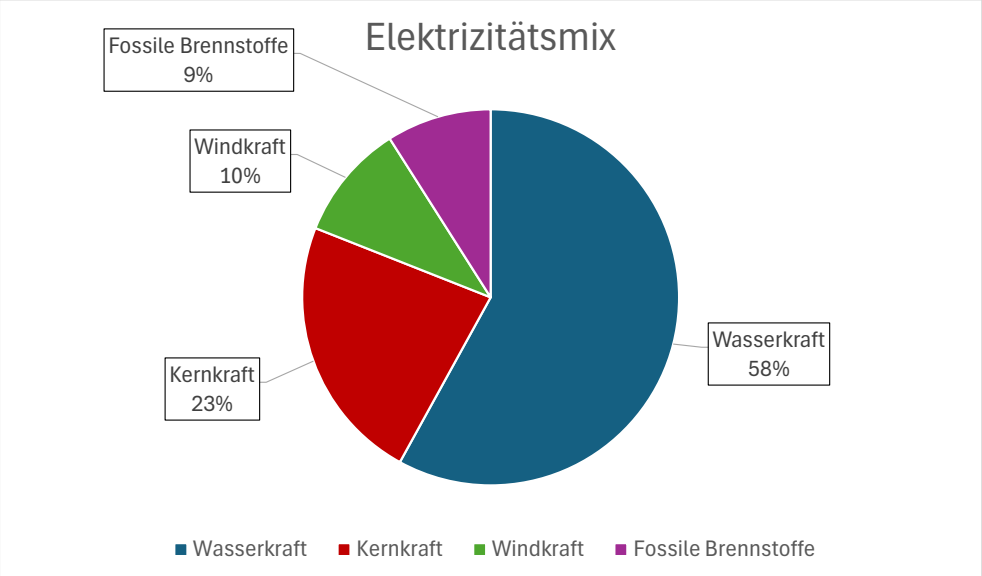
Energieverbrauch

18. Klimabezogene ***Auswirkungen*** werden in erheblichem Maße durch den Energieverbrauch bestimmt. Daher ist es wichtig, sowohl die Menge als auch die Art – z. B. fossile Brennstoffe wie Kohle, Erdöl und Erdgas oder ***erneuerbare Energie*** – und den Energiemix anzugeben. Ein Beispiel für energiebezogene Angaben ist der Gesamtenergieverbrauch, aufgeschlüsselt nach fossilen Brennstoffen und Strom. Auch andere Aufschlüsselungen können angegeben werden, z. B. Verbrauch von gekauftem oder selbst erzeugtem Strom aus erneuerbaren Quellen. Es folgt ein Beispiel für die Angabepflicht nach Nummer 29.

	Verbrauch erneuerbarer Energien (MWh)	**Verbrauch nicht erneuerbarer Energie (MWh)**	**Gesamtenergieverbrauch 202(x) (MWh)**
Strom (wie in den Rechnungen der Versorgungsunternehmen angegeben)	300	186	486
Kraft-/Brennstoffe	3	7	10

19. Erwirbt das Unternehmen fossile Brennstoffe (z. B. Erdgas, Erdöl) oder erneuerbare Kraftstoffe (z. B. Biokraftstoffe wie Biodiesel und Bioethanol), um Strom, Wärme oder Kälte für seinen Eigenverbrauch zu erzeugen, muss es Doppelzählungen vermeiden. Deshalb wird der Energiegehalt des erworbenen Brennstoffs nur beim Brennstoffverbrauch berücksichtigt, während der Verbrauch an aus diesem Brennstoff erzeugtem/r Strom bzw. Wärme nicht noch einmal erfasst oder angegeben wird. Wenn Strom aus erneuerbaren Energien wie Solar- oder Windenergie erzeugt wird – und kein Brennstoff verbraucht werden muss – berücksichtigt das Unternehmen die Menge des erzeugten und verbrauchten Stroms als Stromverbrauch.

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20. Das Unternehmen darf seinen Energieverbrauch nicht durch seine Energieerzeugung ausgleichen, selbst wenn die an einem ***Standort*** erzeugte Energie an Dritte verkauft und von diesen genutzt wird. Auch bei den Angaben zum Verbrauch selbst erzeugter Energie ist eine Doppelzählung des Brennstoffverbrauchs zu vermeiden. Erzeugt das Unternehmen Strom aus einer nicht erneuerbaren oder einer erneuerbaren Brennstoffquelle und verbraucht den erzeugten Strom anschließend selbst, so wird der Energieverbrauch nur einmal beim Brennstoffverbrauch berücksichtigt. Der Anteil des Verbrauchs an ***erneuerbarer Energie*** kann auf der Grundlage von Herkunftsnachweisen, Zertifikaten für erneuerbare Energien oder der in der Stromrechnung angegebenen Stromzusammensetzung berechnet werden. Die Stromrechnung kann sich auf die verbrauchten Stromeinheiten beziehen und den prozentualen Anteil des Stroms aus erneuerbaren Energiequellen ausweisen, wie in der folgenden Abbildung beispielhaft dargestellt.

21. Bei der Erarbeitung der nach Nummer 29 erforderlichen Informationen über den Energieverbrauch klammert das Unternehmen Einsatzstoffe und Brennstoffe aus, die nicht für energetische Zwecke verbrannt werden. Ein Unternehmen, das Brennstoffe als Einsatzstoffe verbraucht, kann Informationen über diesen Verbrauch getrennt von den Pflichtangaben vorlegen.

Umrechnung zwischen verschiedenen Energieeinheiten

22. Die Unternehmen müssen ihren Energieverbrauch endenergiebezogen angeben, d. h. als die an das Unternehmen gelieferte Energiemenge, z. B die vom Versorgungsunternehmen gekauften Megawattstunden (MWh) Strom, der von einer nahe gelegenen Industrieanlage bezogene Dampf oder der an Tankstellen gekaufte Diesel. Strom bezieht sich ausdrücklich auf Wärme, Dampf und Kühlung. Unter Brennstoffe fallen alle Stoffe, die verbrannt werden, z. B. Gas, Erdgas, Biomasse usw.

23. In Nummer 29 ist MWh als bevorzugte Maßeinheit für den Energieverbrauch angegeben. Im Falle von Brennstoffen oder Biomasse muss bei Daten, die in anderen Einheiten ausgedrückt werden, wie Energiegehalt (z. B. kJ, BTU), Volumen (z. B. Liter, m^3) oder Masse (z. B. metrische Tonnen, Kurztonnen), eine Umrechnung in MWh erfolgen.

24. Für den in Masse ausgedrückten Brennstoffverbrauch (z. B. Holz, Kohle) sollte das Unternehmen

(a) den unteren Heizwert (z. B. kJ/metrische Tonne, TJ/g) des Brennstoffs ermitteln (dies kann ein typischer Wert sein, der von zuverlässigen Quellen, z. B. IPCC, veröffentlicht wird, oder er kann vom Lieferanten bereitgestellt oder intern ermittelt werden);

(b) den unteren Heizwert in MWh/Tonne umrechnen, z. B.

$1\ TJ = 10^{12}\ J = 277{,}78\ MWh$; $1\ Gg = 10^{9}\ g = 1\ 000\ t$

11,9 TJ/Gg = 11,9 * 277,78/1000 t = 3,31 MWh/Tonne und

(c) den Energiegehalt der Masse berechnen, z. B.

1 245 345 t * 3,31 MWh/Tonne = 4 117 111 MWh.

25. Bei flüssigen Brennstoffen sollte das Unternehmen

(a) Volumenangaben durch Multiplikation des Volumens mit der Kraftstoffdichte in Masse umrechnen, z. B.

Diesel = 4 456 000 l; Dichte von Diesel = 0,84 kg/l

4 456 000 (l) * 0,84 (kg/l) = 3 743 040 kg = 3 743 t;

(b) den Energiegehalt durch Multiplikation der Masse mit dem unteren Heizwert berechnen, z. B. 3743 [t] * 43 [TJ/Gg] = 3743 t * 43 TJ/(1000 [t]) = 160,95 [TJ] und

(c) TJ in MWh umrechnen, z. B. $1\ TJ = 10^{12}\ J = 277{,}778\ MWh$

160,95 [TJ] = 277,78 [MWh/TJ] * 160,95 [TJ] = 44 708 MWh.

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Dokumentationsquelle:

Daten	*Dokumentationsquelle*
CDP	CDP Technical Note: Conversion of fuel data to MWh (Umrechnung von Brennstoffdaten in MWh)

Treibhausgasemissionen

26. Was die ***Treibhaus-(THG-)Bruttoemissionen*** aus den Tätigkeiten des Unternehmens anbelangt, stütz t sich die Anforderung in Nummer 30 auf die Definitionen und Regeln des THG-Protokolls, dem führenden Standard für die Bilanzierung Berechnung von THG-Emissionen. Unter Nummer 30 sollen die Unternehmen ihre Scope-1- und Scope-2-Emissionen angeben. Scope-1-Treibhausgasemissionen sind direkte Emissionen aus Quellen, die sich im Eigentum oder unter der Kontrolle des Unternehmens befinden. Scope-2-Emissionen sind ***indirekte THG-Emissionen***, die infolge der Tätigkeiten des Bericht erstattenden Unternehmens entstehen (da sie aus der vom Unternehmen verbrauchten Energie stammen), aber deren Quellen sich im Eigentum oder unter der Kontrolle eines anderen Unternehmens befinden. In den folgenden Abschnitten sind weitere Leitlinien zur Berechnung der Scope-1- und Scope-2-Emissionen dargelegt.

27. Scope-1- und Scope-2-Emissionen können im folgenden Format angegeben werden.

	THG-Emissionen 202(x) (tCO_2eq)
Scope 1	45
Scope 2	6
Insgesamt	51

28. Das THG-Protokoll (GHG Protocol) ist ein globaler Standard, auf dessen Grundlage THG-Emissionen auf kohärente und transparente Weise gemessen, erfasst und gesteuert werden können. Der Unternehmensstandard (Corporate Standard) enthält Leitlinien für Unternehmen und andere Organisationen (NRO, staatliche Einrichtungen usw.) in Bezug auf ihre Scope-1-, Scope-2- und Scope-3-Emissionen.

29. Um eine ordnungsgemäße Bilanzierung der Emissionen von Unternehmen sicherzustellen, ist im THG-Protokoll eine Reihe von Grundsätzen für die Berichterstattung festgelegt:

    (a) Relevanz: stellt sicher, dass das Treibhausgasinventar die THG-Emissionen der Organisation widerspiegelt;

    (b) Vollständigkeit: stellt sicher, dass im Treibhausgasinventar alle THG-Emissionsquellen und Tätigkeiten innerhalb der gewählten Systemgrenze erfasst werden;

    (c) Konstanz: stellt die Beständigkeit der verwendeten Methodik sicher und ermöglicht so Vergleiche im Zeitverlauf;

    (d) Transparenz: d. h. Angaben zu den Annahmen, Referenzen und Methoden, die bei der Berechnung der THG-Emissionen verwendet werden; und

    (e) Genauigkeit: stellt sicher, dass die Daten über die THG-Emissionen ausreichend präzise für die Entscheidungsfindung der Nutzer sind.

30. Alternativ zum THG-Protokoll können Unternehmen die Norm ISO 14064-1 heranziehen, wenn diese für ihre Berichterstattung besser geeignet ist.

31. Bei den Angaben über THG-Emissionen ist es wichtig, geeignete Systemgrenzen festzulegen, um sicherzustellen, dass das Treibhausgasinventar korrekt ist, und eine Doppelzählung von Emissionen zu vermeiden. Im THG-Protokoll werden im Wesentlichen zwei Arten von Systemgrenzen definiert: Organisationsgrenzen und Betriebsgrenzen.

    (a) Organisationsgrenzen: Diese werden im THG-Protokoll als die Grenzen definiert, nach denen sich – je nach Konsolidierungsansatz – die Tätigkeiten bestimmen, die im Eigentum oder unter der Kontrolle des Bericht erstattenden Unternehmens stehen. Die Konsolidierung von Emissionen kann auf zweierlei Weise erfolgen: nach dem Eigenkapitalansatz oder nach dem Kontrollansatz. Das Unternehmen wählt den Ansatz entsprechend seinen jeweiligen Umständen.

    (b) Beim Eigenkapitalansatz werden THG-Betriebsemissionen ausgehend vom Eigenkapitalanteil des Unternehmens an der entsprechenden Geschäftstätigkeit bilanziert.

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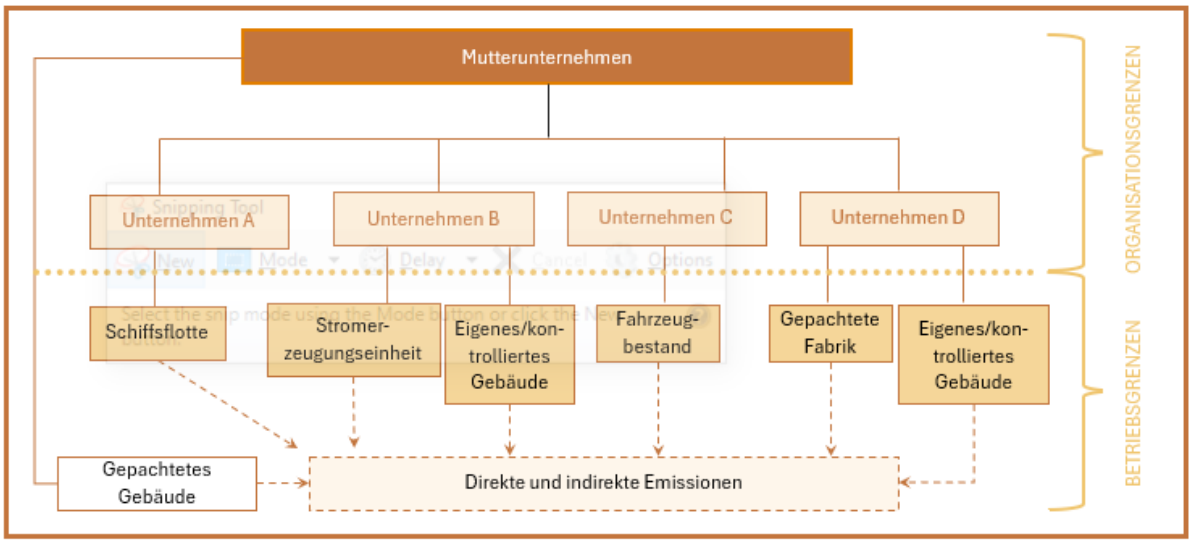
(c) Beim Kontrollansatz berücksichtigt das Unternehmen die THG-Betriebsemissionen aus Tätigkeiten, über die es die finanzielle oder operative Kontrolle ausübt. Folgt das Unternehmen bei der Konsolidierung und Erfassung seiner Emissionen im Bericht dem Kontrollansatz, legt es entweder die Kriterien der operativen Kontrolle oder die Kriterien der finanziellen Kontrolle zugrunde.

i. Ein Unternehmen übt finanzielle Kontrolle über eine Geschäftstätigkeit aus, wenn es in der Lage ist, die Finanz- und Geschäftspolitik für diese Geschäftstätigkeit so zu steuern, dass es wirtschaftlichen Nutzen aus den entsprechenden Aktivitäten zieht.

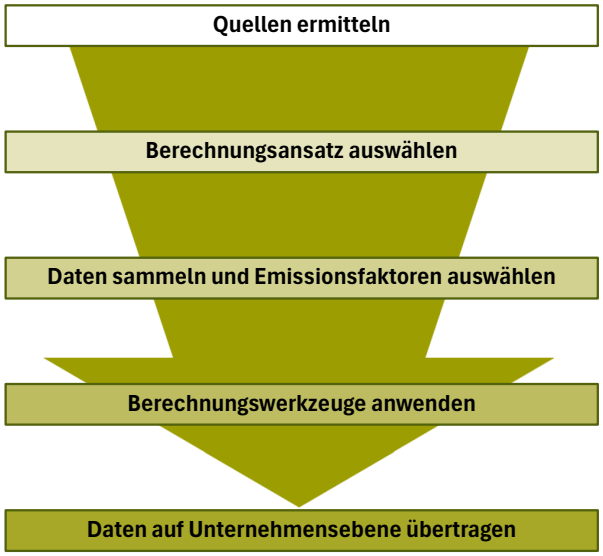
ii. Ein Unternehmen übt operative Kontrolle über eine Geschäftstätigkeit aus, wenn es selbst oder eines seiner Tochterunternehmen die uneingeschränkte Befugnis hat, seine Geschäftspolitik in Bezug auf diese Tätigkeit einzuführen und umzusetzen.

(d) Betriebsgrenzen: Diese werden im THG-Protokoll als die Grenzen definiert, nach denen sich die direkten und indirekten Emissionen im Zusammenhang mit Geschäftstätigkeiten bestimmen, die sich im Eigentum oder unter der Kontrolle des Bericht erstattenden Unternehmens befinden. Diese Bewertung ermöglicht es einem Unternehmen, festzustellen, welche Geschäftstätigkeiten und Quellen direkte Emissionen (Scope 1) bzw. indirekte Emissionen (Scope 2 und Scope 3) verursachen, und zu entscheiden, welche indirekten Emissionen aus seinen Geschäftstätigkeiten einzubeziehen sind.

(e) Die Erwägungen zu Systemgrenzen müssen sich an den oben genannten Grundsätzen (Beständigkeit im Zeitverlauf, Transparenz bei der Dokumentation der Grenzen und Vollständigkeit) orientieren und sind im nachstehenden Bild dargestellt[1].



[1] THG-Protokoll. *GHG Protocol Corporate Accounting and Reporting Standard – Revised Edition*. World Resources Institute und Weltwirtschaftsrat für Nachhaltige Entwicklung, USA.



32. Mit dem THG-Protokoll werden auch Leitlinien und Schritte zur Ermittlung, Berechnung und Nachverfolgung von THG-Emissionen eingeführt, wie im nachstehenden Bild dargestellt[2].

33. Im Rahmen privater und öffentlicher Initiativen wurden verschiedene Instrumente entwickelt, um Unternehmen dabei zu unterstützen, ihr Treibhausgasinventar zu erarbeiten und die damit verbundenen Herausforderungen zu bewältigen. Die EFRAG unterhält auf ihrer Website eine Reihe empfohlener Treibhausgasrechner.

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Leitlinien zu Scope-1-Emissionen und standortbezogenen Scope-2-Emissionen

34. Typische Scope-1-Emissionen schließen CO_2-Emissionen (sowie CH_4- und N_2O-Emissionen) aus der Verbrennung von Brennstoffen (z. B. in Heizkesseln, Öfen, Fahrzeugen usw.) und flüchtige Emissionen aus Klimaanlagen und industriellen Prozessen ein.

35. ***Standortbezogene Scope-2-Emissionen*** umfassen Emissionen aus Elektrizität, Wärme, Dampf und Kälte, die das Bericht erstattende Unternehmen erwirbt oder erhält und verbraucht. Sie spiegeln die durchschnittliche Emissionsintensität der Netze wider, in denen der Energieverbrauch stattfindet, und beruhen hauptsächlich auf Daten zu den durchschnittlichen Emissionsfaktoren des Netzes. Typische Quellen von Scope-2-Emissionen sind alle Betriebseinrichtungen, die Elektrizität (Elektromotoren, Beleuchtung, Gebäude usw.), Wärme (Heizung in industriellen Prozessen, Gebäuden usw.), Dampf (industrielle Prozesse) oder Kälte (industrielle Prozesse, Gebäude usw.) verbrauchen.

36. Die Bewertung der THG-Emissionen kann auf verschiedene Weise erfolgen, unter anderem mithilfe des Berechnungsansatzes, durch Messung oder eine Kombination aus beidem. Ein gängiger Ansatz basiert auf der Berechnung mithilfe von Emissionsfaktoren (EF) – die das Erderwärmungspotenzial (global warming potential – GWP) des Treibhausgases einbeziehen können. Auch eine direkte Messung mit Sensoren

[2] THG-Protokoll. *GHG Protocol Corporate Accounting and Reporting Standard – Revised Edition*. World Resources Institute und Weltwirtschaftsrat für Nachhaltige Entwicklung, USA.

(Durchfluss und Konzentration) ist möglich. In der nachstehenden Tabelle sind die gängigsten Methoden zusammengefasst.

Methode zur THG-Bewertung	Beschreibung	Erforderliche Daten
Messung	Die direkt gemessenen Gasmengen werden mit ihrem jeweiligen Erderwärmungspotenzial multipliziert.	Direkte Menge des emittierten Gases aus Gasmessungen (Durchfluss, Konzentration, Volumen) Erderwärmungspotenzial (GWP) der Gase
Berechnung	Die Tätigkeitsdaten werden mit dem Emissionsfaktor (EF), der das Erderwärmungspotenzial (GWP) integriert, multipliziert.	Tätigkeitsdaten Emissionsfaktoren (EF)

37. Die vorstehende Tabelle enthält folgende Begriffe:

(a) „Tätigkeitsdaten“, die sich in der Regel auf die verbrauchte Brennstoffmenge beziehen. Sie können in Energieeinheiten (z. B. MWh), Volumen (z. B. m³ oder l) oder Masse (z. B. Tonnen oder kg) ausgedrückt werden. Das Unternehmen kann sie anhand von Kaufbelegen für Brennstoffe oder Rechnungen der Versorgungsunternehmen ermitteln;

(b) „Erderwärmungspotenzial“, mit dem die klimabezogenen ***Auswirkungen*** des jeweiligen Treibhausgases im Vergleich zu einer äquivalenten Einheit Kohlendioxid quantifiziert werden;

(c) „Emissionsfaktoren“ (EF), mit denen die THG-Emissionsmenge je Tätigkeitseinheit quantifiziert wird. Bei den Emissionsfaktoren ist das Erderwärmungspotenzial des Treibhausgases häufig bereits einberechnet und muss dann vom Unternehmen nicht mehr berücksichtigt werden.

38. Die nachstehende Tabelle enthält eine nicht erschöpfende Auflistung von Quellen, aus denen die Unternehmen Emissionsfaktoren (EF) und Erderwärmungspotenziale (GWP) leicht entnehmen können. Unternehmen können sich auch auf maßgebliche nationale Quellen beziehen, die für ihre Umstände gegebenenfalls relevanter sind.

Emissionsfaktoren (EF)	*ADEME – Base Empreinte®* *IPCC – Emissions Factor Database* *IPCC – Guidelines for National Greenhouse Gas Inventories (Leitlinien für nationale Treibhausgasinventare)* *Association of Issuing Bodies (AIB) – Residual Mix Grid Emission Factors (Residualmix-Netz-Emissionsfaktoren)* *JRC – Historical GHG emissions factor for electricity consumption (Historischer THG-Emissionsfaktor für den Stromverbrauch)* *IEA – Annual GHG emission factors for World countries from*

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	electricity and heat generation (Jährliche THG-Emissionsfaktoren aus der Strom- und Wärmeerzeugung für die Länder der Welt) (kostenpflichtiger Datensatz))
Erderwärmungspotenzial (GWP)	*IPCC – Global Warming Potential*

39. Auf der Website des SME Climate Hub finden die Unternehmen noch weitere Leitlinien und Hilfsmittel für den Umgang mit ihren THG-Emissionen und deren klimabezogenen ***Auswirkungen*** und die diesbezügliche Berichterstattung.

Beispiel für die Berechnung der Scope-1-Emissionen

40. Unternehmen A verbrennt Heizöl Nr. 4 in einem Industriekessel. Im Rahmen der Finanzbuchhaltung erfasst das Unternehmen seine Kosten, und für die Zwecke der THG-Bilanzierung erfasst es die in den Brennstoffbelegen angegebenen Volumina (m^3). Aus den Belegen entnimmt es die jährlich gekauften Heizölmengen und dokumentiert zusätzlich den Heizölbestand am ersten Kalendertag des Jahres. Im Jahr 2023 kaufte das Unternehmen 100 m^3 Heizöl. Laut seinen Aufzeichnungen enthielten seine Reservoirs am 1. Januar 2023 2,5 m^3 und am 1. Januar 2024 1 m^3. Daraus ermittelt das Unternehmen (aus den Einkäufen und der Messung der Bestände) für das Jahr 2023 einen Heizölverbrauch von insgesamt 101,5 m^3.

41. Auf der Grundlage der IPCC-Liste der Emissionsfaktoren (Tabelle 2.3, Seite 2.18) setzt es den Emissionsfaktor für eine 1:1-Mischung aus Dieselöl und Restöl mit 75,75 tCO_2/TJ an. Für den unteren Heizwert des Brennstoffs ermittelt es anhand veröffentlichter Energiestatistiken einen Wert von 0,03921 TJ/m^3. Da das Erderwärmungspotenzial von CO_2 gleich eins ist, ergeben sich für diese spezifische Scope-1-Quelle folgende CO_2-Emissionen:

$$101{,}5\ m^3 * 0{,}03921\ TJ/m^3 * 75{,}75\ tCO_2/TJ * 1 = 301{,}5\ tCO_2$$

42. Der Vollständigkeit halber werden in diesem Beispiel auch die CH_4- und N_2O-Emissionen berechnet. Ein Blick auf die IPCC-Liste der Emissionsfaktoren zeigt, dass diese 3 kg CH_4/TJ bzw. 0,6 kg N_2O/TJ betragen, woraus sich folgende Emissionen ergeben:

$$CH_4\text{-Emissionen} = 101{,}5\ m^3 * 0{,}03921\ TJ/m^3 * 3\ kg\ CO_2/TJ * 29{,}8 = 0{,}36\ tCO_2eq$$

$$N_2O\text{-Emissionen} = 101{,}5\ m^3 * 0{,}039\ 21\ TJ/m^3 * 0{,}6\ kg\ CO_2/TJ * 273 = 0{,}65\ tCO_2eq$$

43. Die CH_4- und N_2O-Emissionen erhöhen den CO_2-Wert von 301,5 tCO_2 um etwa 1 tCO_2eq, was rund 0,3 % der Gesamtmenge ausmacht. Dies könnte als annehmbarer Berichterstattungsfehler betrachtet werden und hätte daher nicht berechnet und angegeben werden müssen. Die Erderwärmungspotenziale für CH_4 und N_2O stammen aus: *IPCC Sixth Assessment Report, Chapter 7SM*.

Beispiel für die Berechnung der Scope-2-Emissionen

44. Unternehmen A nutzt ein Bürogebäude mit einer Grundfläche von 2000 m^2 in Paris, in dem es den Strom bezahlt, der für Zentralheizung und -kühlung, Beleuchtung, Computer und andere elektrische Betriebsmittel wie Elektrogeräte verbraucht wird. Anhand der Stromrechnungen veranschlagte das Unternehmen den Stromverbrauch des Gebäudes im Jahr 2022 auf 282 MWh. Unter Anwendung eines Emissionsfaktors von 73 g CO_2eq/kWh

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für Frankreich im Jahr 2022 berechnete es seine Scope-2-Emissionen aus dem Stromverbrauch für das Gebäude wie folgt:

$$Emissionen_{THG} = 282\,000\ [kWh] * 73\left[\frac{gCO_2eq}{kWh}\right] = 20.6\ \text{t}\ CO2_2eq$$

45. Unternehmen können auch ihre marktbasierten Scope-2-Zahlen ausweisen. Emissionsfaktoren für marktbasierte Scope-2-Emissionen ergeben sich aus den vertraglichen Vereinbarungen des Unternehmens mit seinen Energieversorgern. Marktbasierte Emissionsfaktoren können von ihren Strom- oder Wärmeversorgern bereitgestellt sowie durch den Erwerb von Energieherkunftsnachweisen (Energy Attribute Certificates) oder Stromabnahmeverträgen (Power Purchase Agreements) oder durch die Nutzung von Residualmix-Emissionsfaktoren (*AIB – Residual Mix Grid Emission Factors, 2024*) gestützt werden.

B4 – Luft-, Wasser- und Bodenverschmutzung

Leitlinien dazu, welche Unternehmen über Umweltverschmutzung Bericht erstatten müssen und welche Schadstoffe dabei zu berücksichtigen sind.

46. Nach Nummer 32 muss das Unternehmen über Schadstoffe, die es im Rahmen seiner eigenen Tätigkeit in Luft, Wasser und Boden emittiert, Bericht erstatten, wenn es aufgrund rechtlicher Vorschriften bereits verpflichtet ist, diese Informationen den zuständigen Behörden zu melden, oder sie im Rahmen eines Umweltmanagementsystems meldet. Daher sollte das Unternehmen zunächst prüfen, ob es diese Informationen bereits meldet – sei es aufgrund einer rechtlichen Anforderung oder freiwillig. Wenn das Unternehmen Informationen über Schadstoffemissionen bereits meldet (oder rechtlich dazu verpflichtet ist), legt es weitere Informationen über diese Emissionen nach den Anforderungen in Nummer 32 vor. Meldet das Unternehmen solche Informationen jedoch noch nicht (und ist rechtlich auch nicht dazu verpflichtet), so muss es dies lediglich angeben.

47. In der Regel wird diese Anforderung für Unternehmen gelten, die Betreiber einer Industrieanlage oder eines Intensivtierhaltungsbetriebs sind, die unter die Richtlinie über Emissionen aus Industrie und Viehzucht (IED 2.0 – Richtlinie (EU) 2024/1785) zur Änderung der Richtlinie über Industrieemissionen (IED – Richtlinie 2010/75/EU) fallen. Die IED 2.0 gilt für etwa 75 000 Anlagen in Europa, in denen Tätigkeiten wie Verbrennung von Brennstoffen in Kesseln mit einer Nennleistung von mehr als 50 MW, Gießen in Metallgießereien, Verarbeitung von Nichteisenmetallen, die Kalkproduktion, Herstellung keramischer Erzeugnisse durch Brennen, Herstellung von Pflanzenschutzmitteln oder Bioziden, Aufzucht von Schweinen oder Geflügel ab 380 Großvieheinheiten, Gerben von Häuten, Schlachthoftätigkeiten usw. ausgeführt werden. Für solche Anlagen müssen die in Luft, Wasser und Boden emittierten Schadstoffe der zuständigen Behörde bereits gemeldet werden, und diese Daten sind öffentlich zugänglich auf dem Industrieemissionsportal (IEP – Verordnung 2024/1244/EU), das an die Stelle des Europäischen Schadstofffreisetzungs- und -verbringungsregisters (E-PRTR – Verordnung 166/2006/EG) getreten ist. Unternehmen, die mehr als eine Betriebseinrichtung betreiben, müssen im Rahmen der E-PRTR-Verordnung nicht über ihre konsolidierten unternehmensweiten Emissionen Bericht erstatten, da die Berichterstattung nur auf Ebene der Betriebseinrichtung erfolgt. Nach dem vorliegenden Standard ist die Gesamtmenge der in allen Betriebseinrichtungen anfallenden Schadstoffe anzugeben. Ebenso müssen Unternehmen, die Eigentümer einer

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Betriebseinrichtung sind, diese aber nicht betreiben, keine Meldung an das E-PRTR abgeben, sollten die in der Einrichtung erzeugten Emissionen jedoch in ihrem Nachhaltigkeitsbericht angeben.

48. Das Gleiche gilt, wenn ein Unternehmen im Rahmen eines Umweltmanagementsystems wie dem System für Umweltmanagement und Umweltbetriebsprüfung (Eco-Management and Audit Scheme – EMAS) oder einer Zertifizierung nach ISO 14001 verpflichtet ist, die vom E-PRTR abgedeckten Schadstoffe zu überwachen und zu melden. Diese Aspekte gelten grundsätzlich als relevante Informationen, die das Unternehmen in seinen Nachhaltigkeitsbericht aufnehmen sollte.

49. Besitzt oder betreibt ein Unternehmen nur eine Betriebseinrichtung und sind seine Verschmutzungsdaten bereits öffentlich zugänglich, so kann es auf das Dokument verweisen, in dem diese Informationen bereitgestellt werden, und muss sie im Bericht nicht erneut angeben. Ebenso kann das Unternehmen, wenn es einen organisationsweiten Bericht, z. B. einen EMAS-Bericht, veröffentlicht, der Daten über die Umweltverschmutzung enthält, im Nachhaltigkeitsbericht auf diesen verweisen.

50. In Bezug auf Schadstoffe sollte das Unternehmen in seinem Nachhaltigkeitsbericht die Art des Schadstoffs zusammen mit der in Luft, Wasser bzw. Boden emittierten Menge in einer geeigneten Masseneinheit (z. B. t oder kg) angeben.

51. Nachstehend ist ein Beispiel angegeben, wie Unternehmen die Informationen über ihre Emissionen in Luft, Wasser und Boden, aufgeschlüsselt nach Schadstoffarten, darstellen können.

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Schadstoff	**Emissionen [kg]**	**Freisetzungsmedium (Luft, Wasser, Boden)**
z. B. Cadmium und Verbindungen	10	Wasser
Schadstoffart 2		
Schadstoffart 3		

52. In Bezug auf die Schadstoffarten, die bei den Angaben nach Nummer 32 zu berücksichtigen sind, kann sich das Unternehmen auf die folgenden Hauptschadstoffe beziehen, die derzeit im EU-Recht geregelt sind. Darüber hinaus muss jedes Unternehmen die spezifischen Schadstoffe berücksichtigen, die in den Vorschriften seiner jeweiligen Rechtsordnung geregelt sind.

53. Beispiele für wichtige Luftschadstoffe (Richtlinie (EU) 2024/299; Verordnung (EU) 2024/1244; *Air pollution from key sectors, Europäische Kommission, 2024*; *Sources and emissions of air pollutants in Europe, Europäische Umweltagentur, 2022*) sind Schwefeloxide (SO_x/SO_2 – z. B. aus Energie- und Wärmeerzeugung in der verarbeitenden Industrie), Stickoxide (NO_x/NO_2 – z. B. aus dem Verkehr), flüchtige organische Verbindungen ohne Methan (NMVOCs – z. B. aus landwirtschaftlichen Tätigkeiten), Kohlenmonoxid (CO – z. B. aus der Verbrennung fossiler Brennstoffe), Ammoniak (NH_3 – z. B. aus der Lagerung und Ausbringung von Dung), Feinstaub (PM_{10} – z. B. aus Verbrennungsprozessen in verarbeitender Industrie, Verkehr oder Landwirtschaft), Schwermetalle (Cd, Hg, Pb, As, Cr, Cu, Ni, Zn), persistente organische Schadstoffe (POPs – Summe aus PAK, HCB, PCBs, Dioxinen/Furanen), ozonabbauende Stoffe

(Fluorchlorkohlenwasserstoffe – FCKW, teilhalogenierte Fluorchlorkohlenwasserstoffe – HFCKW, Halone) sowie Ruß (z. B. aus Energieverbrauch) usw.

54. Zu den wichtigsten Quellen für Emissionen von Luftschadstoffen im privaten Sektor (die auch für die gesamte ***Wertschöpfungskette*** von großer Bedeutung sind) gehören: a) Stromerzeugung aus der Verbrennung von fossilen Brennstoffen oder Biomasse (die gegebenenfalls extern erfolgt, über ein nationales Netz verteilt und anschließend entlang der Wertschöpfungskette verbraucht wird); b) direkte stationäre Verbrennung von fossilen Brennstoffen oder Biomasse im Rahmen der Tätigkeiten oder industriellen Prozesse eines Unternehmens oder Betrieb ortsfester Maschinen oder andere Tätigkeiten, die eine Brennstoffverbrennung erfordern; c) Transport (Güter-, Straßen-, Schienen-, Schiffs- und Luftverkehr, geländegängige Fahrzeuge, wie sie z. B. in der Landwirtschaft oder im Baugewerbe genutzt werden); d) industrielle Prozesse (alle anderen Emissionen, die bei industriellen Prozessen anfallen und nicht aus der Verbrennung von Brennstoffen stammen); e) Landwirtschaft (Viehzucht und Düngewirtschaft, Kulturpflanzenanbau, etwa beim Verbrennen von Ernterückständen, Ausbringen von Dung und Düngemitteln); f) Abfallentsorgung (z. B. Deponierung, Verbrennung in Anlagen oder offene Verbrennung, Kompostierung).

55. Nachstehend ist beispielhaft eine einfache Methode dargestellt, nach der die Luftschadstoffemissionen eines Unternehmens inventarisiert und die Emissionen der jeweiligen Luftschadstoffe berechnet werden können. Diese Methode ist in folgende Schritte unterteilt (ohne die Erstellung einer Übersicht über die ***Wertschöpfungskette***, da im Rahmen des VSME-Standards die für diese Angabepflicht erforderlichen Informationen auf Ebene des Bericht erstattenden Unternehmens bereitzustellen sind: 1) Ermittlung der Emissionsquellen innerhalb der Wertschöpfungskette, 2) Ermittlung von Methoden zur Quantifizierung der Emissionen, 3) Erhebung von Tätigkeitsdaten, 4) Ermittlung von Emissionsfaktoren und 5) Quantifizierung der Emissionen. Die nachfolgende Tabelle enthält eine Zuordnung der Verschmutzungsquellen zu Methoden, nach denen Informationen über die Emissionen der wichtigsten Luftschadstoffe berechnet werden können. [3]

Verschmutzungsquellen	**Methode zur Quantifizierung der Emissionen (Abschnitt des Leitfadens)**
Strom	Abschnitt 4.1
Verbrennung von Brennstoffen	Abschnitt 4.2
Transport	Abschnitt 4.3
Industrieprozesse	Abschnitt 4.4
Landwirtschaft	Abschnitt 4.5
Abfälle	Abschnitt 4.6

[3] SEI und CCAC (2022). A Practical Guide for Business Air Pollutant Emission Assessment. Stockholm Environment Institute (SEI) und Climate and Clean Air Coalition (CCAC).

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56. Nachstehend ist ein Beispiel aufgeführt, wie die Luftschadstoffemissionen nach der weiter oben dargelegten Methode für die verarbeitende Industrie berechnet werden können. In dem betrachteten Beispiel ist M_p die Menge des in der ***Wertschöpfungskette*** eines Unternehmens verwendeten (oder produzierten) Materials M, das nach Prozess p hergestellt wird (in Tonnen, Liter); $EF_{k,p}$ ist der Emissionsfaktor für Schadstoff k in Prozess p (in g/Produktionseinheit); $Em_{k,p}$ sind die Emissionen des spezifischen Schadstoffs k in Prozess p (in g).

$$Em_{k,p} = M_p * EF_{k,p}$$

57. Beispielsweise würde ein mittelgroßer Schokoladenhersteller, der im Jahr 2022 1750 Tonnen Schokolade hergestellt hat, zur Berechnung seiner NMVOC-Emissionen den Standardemissionsfaktor 2 anwenden, was zu folgender Berechnung führen würde:

1750 Tonnen Schokolade * 2 (Emissionsfaktor für NMVOCs) = 3500 Tonnen NMVOC-Emissionen.

58. Transporttätigkeiten können eine weitere bedeutende Quelle für Luftverschmutzung innerhalb des eigenen Betriebs und auf Ebene der ***Wertschöpfungskette*** sein. In diesem Fall muss die Organisation, um beispielsweise die Emissionen eines bestimmten Schadstoffs aus dem Straßenverkehr zu berechnen, die folgende Gleichung verwenden. Dabei ist/sind $FC_{v,f}$ der Kraftstoffverbrauch des mit Kraftstoff f betriebenen Fahrzeugtyps v (in kg); $EF_{k,v,f}$ der Emissionsfaktor für Schadstoff k bei Fahrzeugtyp v und Kraftstoff f (in g/Fahrzeug-km) und $Em_{k,v,f}$ die Emissionen des spezifischen Schadstoffs k bei Fahrzeugtyp v und Kraftstoff f (in g).

$$Em_{k,v,f} = FC_{v,f} * EF_{k,v,f}$$

59. So hat beispielsweise ein leichtes Nutzfahrzeug, das mit Diesel betrieben wird und 2022 eine Gesamtstrecke von 2800 km zurückgelegt hat, die folgende Menge an PM_{10}-Emissionen (Emissionsfaktor von 1,52 g/kg) verursacht:

2800 km * 1,52 = 4256 Gramm PM_{10}-Emissionen.

60. Die Verbrennung von Brennstoffen ist eine weitere wichtige Luftemissionsquelle. In diesem Fall kann eine Gleichung beispielsweise wie folgt lauten. Dabei ist/sind FC_n der in der Quellenkategorie verbrauchte Kraftstoff n ist (in Gj); EF_k der Emissionsfaktor für diesen Schadstoff k (in g/Gj) und Em_k die Emissionen des spezifischen Schadstoffs k (in g).

$$E_{mk} = FC_n * EF_k$$

61. Beispielsweise hat ein Unternehmen, das im Jahr 2020 3 000 000 Gramm Brennstoff verbraucht, einen Emissionsfaktor von 0,67 für SO_2, woraus sich Folgendes ergibt:

3 000 000 * 0,67 = 2 010 000 Gramm SO_2-Emissionen aus der Brennstoffverbrennung im Jahr 2020.

62. Beispiele für wichtige Wasserschadstoffe (Verordnung (EU) 2024/1244; Richtlinie 2000/60/EG; Richtlinie 2006/118/EG; Richtlinie 91/676/EWG; Richtlinie 2010/75/EU und Änderungsrichtlinie (EU) 2024/1785; *Industrial pollutant releases to water in Europe, EUA, 2024*) sind Stickstoff (N), Phosphor (P), Schwermetalle (Cd, Hg, Pb sowie As, Cr, Cu, Ni, Zn), POPs und Pestizide, BTEX (Benzol, Toluol, Ethylbenzol, Xylole) und andere flüchtige organische Verbindungen (VOCs), Stoffe mit nachteiligen Auswirkungen auf die Sauerstoffbilanz (gemessen

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anhand von Parametern wie BSB, CSB usw.), gesamter organischer Kohlenstoff (TOC) usw.

63. Pestizide und Nährstoffe (z. B. N und P) können durch landwirtschaftliche Tätigkeiten freigesetzt werden (*Main sources of water pollution, EUA, 2023*; *Introduction to Freshwater Quality Monitoring and Assessment – Technical Guidance Document*, *UNEP, 2023*) (z. B. Ausbringung von Dung oder anorganischem Düngemittel). Aus Bergbautätigkeiten und Abwassereinleitungen können Schwermetallkonzentrationen stammen. TOC ist ein allgemeiner Indikator für die Verunreinigung von Wasser mit organischen Stoffen, der auf das Vorhandensein von lebendem Material, z. B. in Abwässern, aber auch in Oberflächen- und Grundwasser (übliche Konzentrationen von weniger als 10 mg/l bzw. 2 mg/l), hinweist. Der CSB (chemischer Sauerstoffbedarf) gibt Hinweise auf das Vorhandensein von industriellen oder kommunalen Abwässern, wobei die Werte in der Regel unter 20 mg/l in nicht verschmutztem Wasser liegen, während in industriellen Abwässern bis zu 60 000 mg/l erreicht werden. Der BSB (biologischer/biochemischer Sauerstoffbedarf) wird in der Regel herangezogen, um die Verschmutzung von Oberflächenwasser durch organische Stoffe zu bestimmen oder die Effizienz der Abwasserbehandlung zu beurteilen, wobei die Werte in der Regel bei etwa 2 mg/l in nicht verschmutztem Wasser und bei 10 mg/l und mehr in verschmutztem Wasser liegen. VOCs können durch Leckagen ins Wasser freigesetzt werden.

64. Als Methode zur Messung der Wasseremissionen empfiehlt die Europäische Umweltagentur (EUA) ein einfaches Schätzverfahren (*Calculating emissions to water – a simplified method, ETC/ICM Report 3/2022*) ähnlich dem für die oben genannten Luftschadstoffe. In der nachstehenden Gleichung ist/sind AR_a die Tätigkeitsrate für Tätigkeit a (auf der Grundlage der spezifischen Tätigkeit oder des spezifischen Prozesses auszuwählen; siehe z. B. M_p in der Berechnung der Luftemissionen weiter oben); $EF_{p,a}$ der Emissionsfaktor für Schadstoff p bei Tätigkeit a und $Em_{p,a}$ die Emissionen des spezifischen Schadstoffs p bei Tätigkeit a.

$$Em_{p,a} = AR_a * EF_{p,a}$$

65. Beispiele für wichtige Bodenschadstoffe (Verordnung (EU) 2024/1244; Richtlinie 86/278/EWG) sind N, P, Schwermetalle (z. B. Flächenausbringung von Klärschlamm), BTEX und andere VOCs, POPs und Pestizide.

66. Die aus dem privaten Sektor stammenden Quellen der Bodenverschmutzung sind hauptsächlich Produkte oder Nebenprodukte industrieller Prozesse (z. B. Chemikalien-, Textilherstellung, Energieerzeugung), unbeabsichtigte Austritte von Benzinerzeugnissen, Viehzucht und landwirtschaftliche Tätigkeiten (z. B. Bewässerung mit unbehandeltem Abwasser, Geflügelaufzucht), Sammlung und Behandlung von Abwasser, Herstellung und Verarbeitung von Metallen und Mineralien sowie Transport (*Global assessment of soil pollution: Report, FAO, 2021*).

67. Mehrere nationale Handbücher wurden erarbeitet, um Unternehmen bei der Berechnung ihrer Emissionen in Luft, Wasser und Boden zu unterstützen. Beispielsweise werden den Organisationen in Australien (*Emission Estimation Technique Manual for Soft Drink Manufacture, National Pollution Inventory*) und Südafrika (*A Guide to Reporting and Estimating Emissions for the IPWIS*) einige Berechnungsoptionen zur Verfügung gestellt, aus denen sie je nach ihren Möglichkeiten aus Folgendem auswählen können: direkte Messung (z. B. Probenahme, System zur kontinuierlichen Überwachung), Massenbilanz, technische Berechnungen, Emissionsfaktoren (nach der Gleichung wie vorstehend für Luft- und Wasseremissionen angegeben) usw. Bei der Berechnung solcher Emissionen wird im Allgemeinen wie folgt vorgegangen: 1) Ermittlung der Emissionsquellen

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innerhalb der Anlage (Verbrennung, Fertigung, Lösemittelverdampfung, Lagerung, flüchtige Emissionen); 2) Bestandsaufnahme der verfügbaren Informationen; 3) Auswahl der Methode, die am besten für den jeweils zu bewertenden Prozess, die verfügbaren Informationen und die zur Gewinnung der benötigten Daten verfügbaren Messinstrumente geeignet ist, aus der Liste der Berechnungsmethoden; 4) Erhebung der für jede Methode erforderlichen Daten und 5) Berechnung der Emissionen. Die Handbücher enthalten für jede Methode zur Emissionsberechnung mehrere Gleichungen und Beispiele.

68. Eine Liste von Emissionsfaktoren für Luftschadstoffe ist auf der Website der Europäischen Umweltagentur zu diesem Thema zu finden. Obwohl Emissionsfaktoren häufiger für Luftverschmutzungen verwendet werden, hat die Weltgesundheitsorganisation bestimmte Faktoren für spezifische Prozesse im Zusammenhang mit der Ableitung in Oberflächenwasser und Auffülldeponien zur Verfügung gestellt. Weitere Emissionsfaktoren für POPs sind auf der Website zum Stockholmer Übereinkommen *Toolkit for Identification and Quantification of Releases of Dioxins, Furans and Other Unintentional POPs* zu finden.

69. Es ist zu beachten, dass die Anforderungen nach Nummer 32 nur für KMU gelten, die in bestimmten Sektoren tätig sind. Unternehmen, die beispielsweise an der Erbringung von Dienstleistungen beteiligt sind (z. B. in Co-Working-Büros, in gemeinsam genutzten Einrichtungen oder aus der Ferne), unterliegen in der Regel nicht dieser Angabepflicht. Im Gegensatz dazu haben Unternehmen, die Produktionstätigkeiten (z. B. Herstellung von Chemikalien) ausüben, im Allgemeinen ***Auswirkungen*** durch Umweltverschmutzung und sollten deshalb dieser Angabepflicht nachkommen. Die nachstehende Tabelle (mit Anpassungen übernommen aus dem *EMAS-Nutzerhandbuch*) enthält Beispiele für branchenspezifische Auswirkungen, u. a. von Bürodienstleistungen, bei denen Verschmutzungsaspekte möglicherweise nicht relevant sind.

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Tätigkeit	Umweltaspekt	Umweltauswirkung
Transport	– verbrauchte Maschinenöle, Kraftstoffverbrauch – Fahrzeugemissionen – Reifenabrieb (Feinstaub)	– **Boden-, Wasser-, Luftverschmutzung** – Treibhauseffekt, Lärm
Baugewerbe	– Verbrauch an Primärrohstoffen (Ressourcen) – Luftemissionen, Lärm, Erschütterungen usw. durch Baumaschinen – Flächenverbrauch	– Rohstoffverfügbarkeit – Lärm, **Boden-, Wasser-, Luftverschmutzung** – Zerstörung der Bodenflora – Biodiversitätsverluste
Bürodienstleistungen	– Verbrauch von Materialien, z. B. Papier, Toner – Stromverbrauch (führt zu indirekten CO_2-Emissionen)	– Erzeugung von gemischten Siedlungsabfällen – Treibhauseffekt

Chemische Industrie	– Verbrauch an Primärrohstoffen (Ressourcen) – Abwasser – Emissionen flüchtiger organischer Verbindungen – Emissionen ozonabbauender Stoffe	– Rohstoffverfügbarkeit – **Wasserverschmutzung** – photochemische Ozonbildung – **Zerstörung der Ozonschicht**

B5 – Biodiversität

Leitfaden zur Ermittlung von Standorten in oder in der Nähe von Gebieten mit schutzbedürftiger Biodiversität

70. Nach Nummer 33 muss das Unternehmen die ***Standorte*** angeben, die es in oder ***in der Nähe von Gebieten mit schutzbedürftiger Biodiversität*** betreibt. Bei welchen Gebieten es sich um Gebiete mit schutzbedürftiger Biodiversität handelt, wird durch besondere Naturschutzvorschriften auf europäischer oder internationaler Ebene festgelegt. Dazu gehören Schutzgebiete des Natura-2000-Netzes, UNESCO-Welterbestätten und Biodiversitäts-Schwerpunktgebiete (KBA) sowie andere Schutzgebiete, die von Behörden als Gebiete mit besonderem Schutzbedarf ausgewiesen wurden (z. B. Waldschutzgebiete oder Flächen in Flussgebietseinheiten).

71. Zur Ermittlung von Schutzgebieten und ***Gebieten mit schutzbedürftiger Biodiversität*** kann das Unternehmen Datenbanken wie die *World Database on Protected Areas (WDPA)* (eine globale Datenbank zur Identifizierung von Meeres- und Landschutzgebieten) und die *World Database on Key Biodiversity Areas* sowie die *Rote Liste gefährdeter Arten der IUCN* konsultieren. Das Unternehmen kann auch Hilfsmittel wie das IBAT (Integrated Biodiversity Assessment Tool), ein Instrument zur Bewertung der Biodiversität, nutzen.

72. Im Kontext von „B5 – Biodiversität“ bezieht sich „***in der Nähe von***“ auf ein Gebiet, das sich mit einem ***Gebiet mit schutzbedürftiger Biodiversität*** (teilweise) überschneidet oder an ein solches angrenzt.

73. Die folgende Tabelle zeigt, wie Informationen über ***Standorte*** in oder in der Nähe von ***Gebieten mit schutzbedürftiger Biodiversität*** dargestellt werden können.

Ort	**Fläche** (Hektar)	**Gebiet mit schutzbedürftiger Biodiversität**	**Spezifikation** (in/in der Nähe von Gebieten mit schutzbedürftiger Biodiversität gelegen)
Land – Name des Standorts 1			
Land –			

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Name des Standorts 2			
Land – Name des Standorts 3			
…			

Leitlinien zur Berechnung und Angabe der ***Flächennutzung***

74. „***Versiegelte Flächen***“ sind Flächen, auf denen der ursprüngliche Boden abgedeckt wurde (z. B. mit Straßen, Gebäuden, Parkplätzen), wodurch dieser undurchlässig wird, was zu ***Auswirkungen*** auf die Umwelt führt.

75. Grünflächen oder ***naturnahe Flächen*** sind Flächen, die in erster Linie die Natur erhalten oder wiederherstellen. Naturnahe Flächen/Grünflächen können sich auf dem Gelände des ***Standorts*** der Organisation befinden und Dächer, Fassaden, Wasserableitungssysteme oder andere Merkmale umfassen, die zur Förderung der Biodiversität konzipiert, angepasst oder verwaltet werden. Naturnahe Flächen können sich auch abseits des Standorts der Organisation befinden, sofern sie im Eigentum der Organisation stehen oder von dieser bewirtschaftet werden und in erster Linie der Förderung der Biodiversität dienen.

76. Die folgende Tabelle zeigt, wie Informationen über die ***Flächennutzung*** dargestellt werden können (EMAS, 2023).

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Art der Flächennutzung	**Fläche** (Hektar oder m^2)
Gesamte versiegelte Fläche	
Gesamte naturnahe Fläche am Standort	
Gesamte naturnahe Fläche abseits des Standorts	
Gesamter Flächenverbrauch	

B6 – Wasser

Leitlinien zur Berechnung und Angabe von Wasserentnahmen und Wasserverbrauch

77. ***Wasserentnahme*** bezieht sich auf die Menge an Wasser, das während des Berichtszeitraums aus einer beliebigen Quelle in die Organisationsgrenzen des Unternehmens eingebracht wird. In der Praxis ist dies bei den meisten Unternehmen die Menge an Wasser, die aus dem öffentlichen Wasserversorgungsnetz entnommen wird, wie in den Rechnungen der Versorgungsunternehmen auswiesen. Die Wasserentnahme umfasst jedoch gegebenenfalls auch Wassermengen aus anderen Quellen wie Grundwasser aus eigenen Brunnen, Wasser aus Flüssen oder Seen oder von anderen Unternehmen erhaltenes Wasser. Im speziellen Fall von landwirtschaftlich tätigen Unternehmen würde die Wasserentnahme auch Regenwasser umfassen, wenn es direkt vom Unternehmen gesammelt und gespeichert wird.

78. Daten zu ***Wasserentnahmen*** können aus Messungen mit Durchflussmessern gewonnen werden oder – da in der Praxis die Wasserentnahme bei den meisten Unternehmen der Menge an Wasser entspricht, das aus dem öffentlichen Wasserversorgungsnetz entnommen wird, wie in den Rechnungen der Versorgungsunternehmen auswiesen – aus Wasserrechnungen entnommen werden. Wenn direkte Messungen nicht möglich sind oder als unzureichend erachtet werden und daher ergänzt werden müssen, können die Daten zur Wasserentnahme beispielsweise anhand von Berechnungsmodellen und Industriestandards geschätzt werden.

79. Im Falle von Bürogemeinschaften oder Co-Working-Büros könnte eine Methode zur Berechnung der ***Wasserentnahme*** beispielsweise darin bestehen, die Gesamtwasserentnahme des Gebäudes aus der Wasserrechnung zu entnehmen und die Wasserentnahme pro ***Beschäftigtem*** nach folgender Gleichung zu berechnen:

tägliche Wasserentnahme je Beschäftigtem (in l) = jährliche Wasserentnahme (in l) / (Anzahl der Beschäftigten im gesamten gemeinsam genutzten Gebäude * Anzahl der Arbeitstage).

Das Unternehmen könnte dann die Wasserentnahme je Beschäftigtem mit der Anzahl seiner Beschäftigten und der Anzahl ihrer Arbeitstage im Berichtsjahr multiplizieren, um den endgültigen Zahlenwert für den Datenpunkt zu erhalten.

Zahlenbeispiel zu der vorgeschlagenen Gleichung: In der Wasserrechnung eines Co-Working-Büros, in dem 100 Beschäftigte verschiedener Unternehmen für eine angenommene Anzahl von 240 Tagen im Jahr gemeinsam arbeiten, ist eine jährliche Wasserentnahme von 1296 m^3 (entspricht 1 296 000 l) ausgewiesen. Die angenommene durchschnittliche Anzahl der Arbeitstage kann z. B. auf nationalen Statistiken beruhen. Für die tägliche Wasserentnahme je Beschäftigtem ergäbe sich in diesem Fall:

tägliche Wasserentnahme je Beschäftigtem = 1 296 000 l/(100 * 240) = 54 l

80. Hätte das Bericht erstattende Unternehmen 25 ***Beschäftigte***, die das Co-Working-Büro an 220 Tagen im Jahr nutzen, würde sich die jährliche ***Wasserentnahme*** des Unternehmens im Co-Working-Büro aus der täglichen Wasserentnahme je Beschäftigtem multipliziert mit der Anzahl der Beschäftigten und der Arbeitstage ergeben, d. h. 54 l * 25 * 220 = 297 000 l (entspricht 297 m^3).

81. Diese Art der Berechnung könnte zweckmäßig sein, wenn die Wasserrechnung des gemeinsam genutzten Gebäudes eingesehen werden kann. Diese einfache Berechnungsmethode weist einige Einschränkungen auf, da z. B. unterschiedliche Nutzungen der Gebäudeteile nicht berücksichtigt werden (z. B. könnten in einem Gebäude mit sieben Etagen auf sechs Etagen Büros und auf einer Etage eine Kantine oder

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ein Restaurant untergebracht sein). Derartige Einschränkungen könnte das Unternehmen überwinden, wenn zusätzliche Daten zur Verfügung stehen, mit denen die oben als Beispiel angegebene Grundberechnung weiter verfeinert wird.

82. Gäbe es bei dem Beispiel der Bürogemeinschaften keine Möglichkeit, auf die Wasserrechnung zuzugreifen, könnten Daten zur ***Wasserentnahme*** durch Berechnungen erhoben werden, in denen die Durchflussmengen der Armaturen und Belegungsdaten die Haupteingangsgrößen bilden. Eine mögliche Gleichung könnte lauten:

Wasserentnahme insgesamt = ∑(Durchflussmenge * Anzahl der Nutzungen pro Tag * Anzahl der Tage pro Jahr * Belegung)

Dabei gilt:

(a) die Durchflussmenge kann für jede Armatur einzeln z. B. aus der Projektdokumentation oder Kennzeichnungen auf den Armaturen entnommen werden oder auf der Grundlage von öffentlich zugänglichen Durchschnittsdaten geschätzt werden, wenn genauere Informationen nicht beschafft werden können;

(b) die Anzahl der Nutzungen pro Tag kann auf der Grundlage öffentlich zugänglicher Durchschnittswerte geschätzt werden;

(c) „Anzahl der Tage“ bezieht sich auf die Anzahl der Geschäftstage des Bericht erstattenden Unternehmens in einem Jahr;

(d) „Belegung“ bezieht sich auf die Anzahl der ***Beschäftigten*** des Unternehmens, die das Büro nutzen; sie wird häufig in Vollzeitäquivalenten (VZÄ) berechnet;

(e) das Summensymbol ∑ weist darauf hin, dass die Berechnungen für jede Armatur zu addieren sind, um die Gesamtwasserentnahme des Bericht erstattenden Unternehmens in einer Bürogemeinschaft zu ermitteln.

83. Weitere mögliche Quellen, die in Bürogemeinschaften tätige Unternehmen für ihre Angaben zur ***Wasserentnahme*** heranziehen könnten, sind *JRC Level(s) indicator 3.1: Use stage water consumption user manual* sowie weitere damit zusammenhängende Dokumente und Berechnungsbögen (siehe *PG Section Documents | Product Bureau (europa.eu)*). Darüber hinaus könnte das Unternehmen das *EMAS-Referenzdokument für die öffentliche Verwaltung* und das *EMAS-Referenzdokument für die Bauindustrie* sowie Bewertungs- und Zertifizierungssysteme heranziehen, die in ihren Methoden nützliche Hinweise darauf geben könnten, wie die Berechnung der Wasserentnahme in Büros und gemeinsam genutzten Räumlichkeiten weiter verfeinert werden kann.

84. Die angeführten Beispiele für die Erhebung von Daten zur ***Wasserentnahme*** im Falle gemeinsam genutzter Büros lassen sich auf Unternehmen in verschiedenen Branchen übertragen und von diesen anwenden, wobei gegebenenfalls Anpassungen an die branchen- und unternehmensspezifischen Umstände des Unternehmens erforderlich sind. *Ecomapping und ISO/EMASeasy: schnell und einfach zum Umweltmanagementsystem!* und die *branchenspezifischen EMAS-Referenzdokumente (Sectoral Reference Documents – SRD)* könnten zu KMU- und branchenspezifischen Methoden und Indikatoren für die Wasserentnahme sowie zu Industriestandards und Vergleichswerten konsultiert werden.

85. Der ***Wasserverbrauch*** ist die Menge an Wasser, das in die Systemgrenzen des Unternehmens eingebracht wird und nicht in die Wasserumwelt zurückgeführt wird oder werden soll bzw. nicht an einen Dritten weitergeleitet wird oder werden soll. Dies betrifft typischerweise verdunstetes oder verdampftes Wasser (z. B. in thermischen Energieprozessen wie Trocknung oder Stromerzeugung), in Produkte integriertes Wasser

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z. B. in der Lebensmittelproduktion) oder Wasser für Bewässerungszwecke (z. B. in der Landwirtschaft oder zur Bewässerung in Betriebsstätten).

86. „Ableitung von Wasser“ bezieht sich z. B. auf die Menge an Wasser, das direkt in Gewässer wie Seen oder Flüsse oder die öffentliche Kanalisation eingeleitet oder an andere Unternehmen zur kaskadierenden Wassernutzung weitergeleitet wird. Sie kann als Wasseroutput des Unternehmens betrachtet werden.

87. Der ***Wasserverbrauch*** kann somit wie folgt berechnet werden:

Wasserverbrauch = Wasserinputs – Wasseroutputs

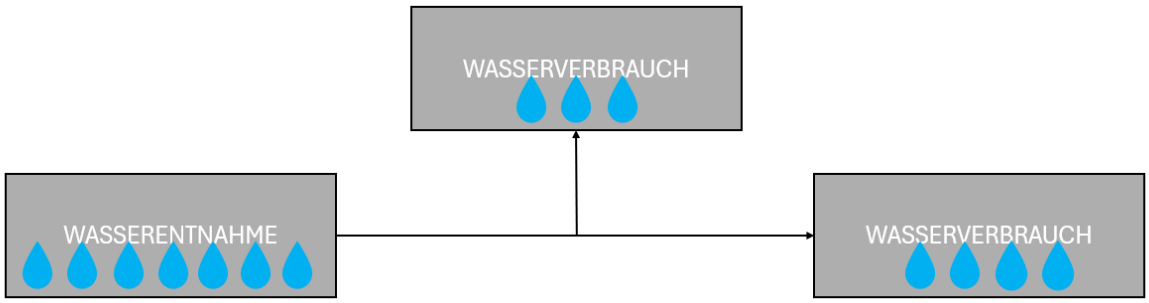
Mit anderen Worten:

Wasserverbrauch = (Wasserentnahme) – Ableitungen von Wasser.

Bei Unternehmen, die ausschließlich Wasser aus dem öffentlichen Wassernetz entnehmen und in die Kanalisation einleiten, wird der Wasserverbrauch nahe Null liegen und muss daher im Bericht nicht angegeben werden.

Ganz allgemein gilt die Angabepflicht beim Wasserverbrauch für Informationen, die rechtlich bereits vorgeschrieben sind, bereits gemeldet werden und/oder für die Branche relevant sind.

88. Das nachstehende Bild zeigt eine schematische Darstellung des Zusammenhangs zwischen ***Wasserentnahme***, ***Wasserverbrauch*** und Ableitung von Wasser.



89. Das Unternehmen kann zusätzliche Informationen bereitstellen, um seine ***Wasserentnahmen*** oder seinen ***Wasserverbrauch*** im Kontext zu erläutern. Es kann beispielsweise darauf eingehen, ob Regenwasser gesammelt und als Ersatz für Leitungswasser verwendet wird oder ob Wasser zur kaskadierenden Nutzung an andere Parteien weitergeleitet wird.

90. Nachstehend ist ein Beispiel angegeben, wie Unternehmen quantitative Informationen über ihre Entnahmen und Ableitungen von Wasser und ihren Wasserverbrauch aufgeschlüsselt nach ***Standort*** darstellen können.

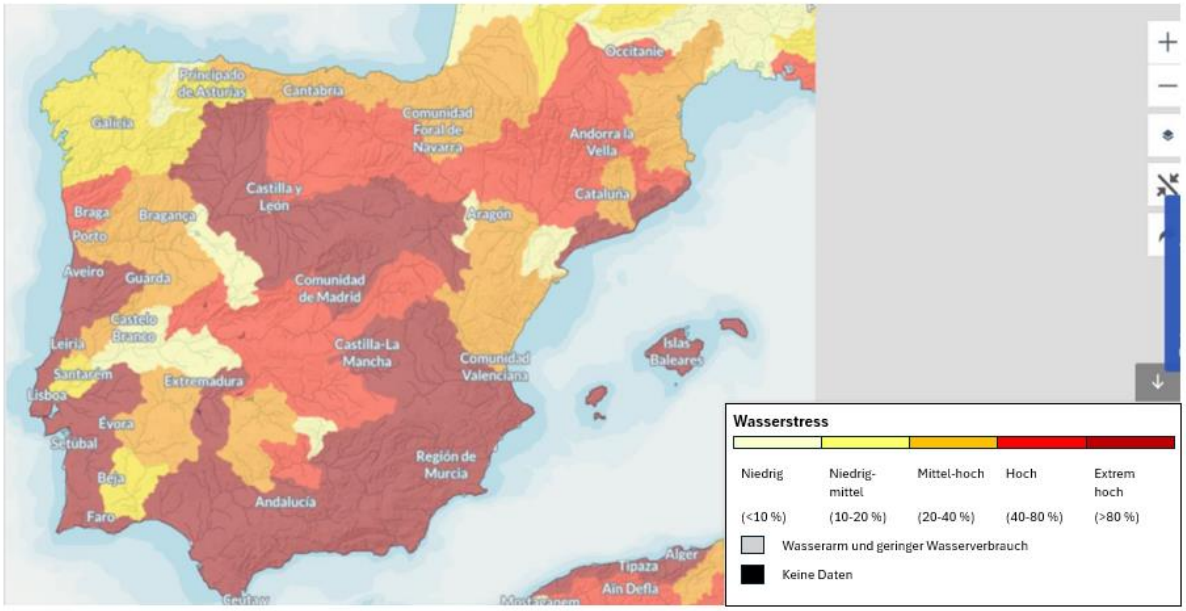
	Wasserentnahme z. B. m^3	**Wasserverbrauch** z. B. m^3 (falls zutreffend)
Alle Standorte		
Standorte in Gebieten mit Wasserstress		

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Leitlinien zur Feststellung, ob das Unternehmen ***in einem Gebiet mit hohem Wasserstress tätig*** *ist*

91. Das Unternehmen kann bei den lokalen (z. B. nationalen, regionalen) Wasserbehörden seines Geschäftsorts bzw. seiner Geschäftsorte die benötigten Informationen einholen, um die Wasserressourcen an dem/den spezifischen Standort(en) zu bewerten, einschließlich der Ermittlung von Gebieten mit hohem Wasserstress. Das Unternehmen kann auch öffentlich zugängliche und kostenlose Instrumente nutzen, mit denen die Wasserknappheit weltweit erfasst wird. Ein solches Instrument ist der *Aqueduct Water Risk Atlas des WRI*, der eine interaktive Karte zu einem Wasserstressindikator (dem „Baseline-Wasserstress“, mit dem das Verhältnis des Gesamtwasserbedarfs zu den verfügbaren erneuerbaren Oberflächen- und Grundwasserressourcen gemessen wird) auf Teileinzugsgebietsebene bietet. Mit diesem Instrument können die Unternehmen für verschiedene Flusseinzugsgebiete weltweit den für den Wasserstress festgelegten Ausgangswert (Baseline) abrufen. Ein Baseline-Wasserstressindikator von mehr als 40 % weist auf ein Gebiet mit hohem Wasserstress hin.

92. Zur Veranschaulichung sind auf der nachstehenden Karte die wichtigsten iberischen Flusseinzugsgebiete und ihre Wasserstress-Einstufung nach dem WRI Aquedukt dargestellt.



Die Darstellung zeigt mehrere Wassereinzugsgebiete auf der Iberischen Halbinsel und deren Wasserstress-Einstufung. Der größte Teil der südlichen Halbinsel, mit Ausnahme des Guadiana-Beckens (gelb), liegt in einem Gebiet mit sehr hohem Wasserstress. Wenn das Unternehmen also im Guadalquivir-Becken tätig ist (z. B. in der Region Andalusien, in der sehr hoher Wasserstress herrscht), müsste das Unternehmen seinen ***Wasserverbrauch*** in dieser Region/diesem Wassereinzugsgebiet aufschlüsseln. Wenn es seine Geschäftstätigkeit jedoch im südlichen Teil des Guadiana-Flusseinzugsgebiets (in dem niedriger Wasserstress herrscht) ausübt, müsste es seinen Wasserverbrauch in dieser Region/diesem Wassereinzugsgebiet nicht aufschlüsseln.

93. Weitere Instrumente, mit denen Unternehmen bestimmen können, ob ihre Standorte in Gebieten mit Wasserstress liegen, sind die statische Karte (und der zugehörige Datensatz) *Water Exploitation Index plus (WEI+) for summer and Urban Morphological Zones (UMZ)* der EUA sowie die interaktive Karte *Water exploitation index plus (WEI+) for*

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river basin districts (1990-2015), die beide den Wasserstressindikator „Wassernutzungsindex, plus“ (WEI+) darstellen, mit dem der Gesamtwasserverbrauch als Prozentsatz der erneuerbaren Süßwasserressourcen auf Teileinzugsgebietsebene gemessen wird. WEI+-Werte von 40 % oder mehr weisen in der Regel auf Gegebenheiten mit hohem Wasserstress hin. Es ist hervorzuheben, dass sich der Baseline-Wasserstressindikator des WRI Aqueduct auf den Wasserbedarf bezieht, während WEI+, der Wasserstressindikator der EUA, auf dem Wasserverbrauch basiert.

B7 – Ressourcennutzung, Kreislaufwirtschaft und Abfallbewirtschaftung

Leitlinien zu den Grundsätzen der Kreislaufwirtschaft

94. Bei den Angaben über seine Produkte, seine Materialverwendung und seine Abfallbewirtschaftung kann das Unternehmen auf die ***Grundsätze der Kreislaufwirtschaft*** Bezug nehmen. Die Grundsätze der Kreislaufwirtschaft sind in den folgenden Absätzen aufgeführt. Die wichtigsten Grundsätze der Kreislaufwirtschaft werden nachstehend dargelegt, wobei die von der Europäischen Kommission berücksichtigten Grundsätze *kursiv* gesetzt sind.

    Vermeidung von Abfällen und Umweltverschmutzung – Dies kann durch Prozessverbesserungen und auch durch Designüberlegungen auf Ebene der *Verwendbarkeit, Wiederverwendbarkeit, Reparierbarkeit, Demontage* und *Wiederaufarbeitung* geschehen.

    Kreislaufführung von Produkten und Materialien (mit ihrem höchstem Wert) – *Wiederverwendbarkeit* und ***Recycling*** sind zentrale Faktoren für die Kreislaufführung von Produkten, die jedoch noch verbessert werden kann, wenn in der Designphase Aspekte wie Verwendbarkeit, Wiederverwendbarkeit, Reparierbarkeit, Wiederaufarbeitung und Demontage besonders berücksichtigt werden. Faktoren wie die Integration von Biomaterialien und ihre *Rückführung über den biologischen Kreislauf* können ebenfalls berücksichtigt werden, z. B. durch die Verwendung biologisch abbaubarer Pflanzenabdeckungen anstelle von Kunststoffen in der Landwirtschaft.

    Regenerierung der Natur – wann immer möglich, sollten menschliche Aktivitäten darauf abzielen, die Natur zu regenerieren und wichtige ökologische Funktionen (z. B. Entwässerung, Bereitstellung von Lebensräumen, Wärmeregulierung usw.), die durch frühere menschliche Aktivitäten verloren gegangen sind, zu verbessern oder wiederherzustellen.

Leitlinien zum Gesamtabfallaufkommen und zu Abfällen, die zum Recycling oder zur Wiederverwendung umgeleitet werden

95. Unternehmen, die ausschließlich Haushaltsabfälle erzeugen, müssen die in Nummer 38 geforderten Angaben nicht bereitstellen. In solchen Fällen gibt das Unternehmen nur an, dass es diese Art von Abfällen erzeugt.

96. Bei seinen Angaben über ***gefährliche Abfälle*** nach Nummer 38 Buchstabe a kommt das Unternehmen den Anforderungen in Bezug auf ***radioaktive Abfälle*** nach Indikator Nr. 9 in Anhang I Tabelle 1 der Verordnung über nachhaltigkeitsbezogene Offenlegungspflichten im Finanzdienstleistungssektor (SFDR)[4] nach. Dieser SFDR-

[4] Delegierte Verordnung (EU) 2022/1288 der Kommission vom 6. April 2022 zur Ergänzung der Verordnung (EU) 2019/2088 des Europäischen Parlaments und des Rates im Hinblick auf technische

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Indikator (Verhältnis zwischen Tonnen radioaktiver und ***gefährlicher Abfälle***) kann anhand des Zählers und des Nenners, die das Unternehmen unter Nummer 38 Buchstabe a angibt, rechnerisch ermittelt werden.

97. KMU müssen Angaben zu gefährlichen und ***radioaktiven Abfällen*** bereitstellen, wenn bei ihren Tätigkeiten solche Abfälle erzeugt werden. Die Anwendbarkeit hängt vom Vorhandensein gefährlicher oder radioaktiver Stoffe in den Geschäftsprozessen ab.

98. Den Unternehmen wird empfohlen, ihre ***gefährlichen Abfälle*** anhand des *Europäischen Abfallkatalogs (EAK)* (Beschluss der Kommission vom 18. Dezember 2014 zur Änderung der Entscheidung 2000/532/EG über ein Abfallverzeichnis gemäß der Richtlinie 2008/98/EG des Europäischen Parlaments und des Rates) einzustufen, in dem Abfälle in Abfallkategorien eingeteilt werden. Jeder Abfall, der im EAK mit einem Sternchen (*) gekennzeichnet ist, gilt als gefährlicher Abfall, üblicherweise mit dem Hinweis „enthält gefährliche Stoffe“. Beispiel:

    (a) Bereich Medizin: kontaminierte scharfe/spitze Gegenstände wie Nadeln und Spritzen, die in medizinischen Einrichtungen verwendet werden („Abfälle, an deren Sammlung und Entsorgung aus infektionspräventiver Sicht besondere Anforderungen gestellt werden“, EAK-Code 18 01 03*), zytotoxische und zytostatische Arzneimittel (EAK-Code 18 01 08*), verbrauchte Radiopharmaka und bestimmte Diagnosegeräte, die radioaktive Stoffe enthalten;

    (b) verarbeitendes Gewerbe: als gefährlich eingestufte gebrauchte Schmiermittel und Öle (EWC-Code 13 02 05*);

    (c) Bauwesen: asbesthaltige Materialien (EWC-Code 17 09 03*), Boden und Steine, die gefährliche Stoffe enthalten (EWC-Code 17 05 03*);

    (d) Batterien und Akkumulatoren: Bleibatterien (16 06 01*), Ni-Cd-Batterien (16 06 02*), Quecksilber enthaltende Batterien (16 06 03*).

99. Darüber hinaus gelten Abfälle als gefährlich, wenn sie eine oder mehrere der in Anhang II der Abfallrahmenrichtlinie (Richtlinie 2008/98/EG) aufgeführten gefährlichen Eigenschaften aufweisen. Zur leichteren Orientierung werden diese im Folgenden zusammen mit den entsprechenden Piktogrammen zu gefährlichen Eigenschaften wie Entflammbarkeit, Toxizität und Ätzwirkung dargestellt, die zur Einstufung von Abfällen als gefährlich führen können.

100. Auch ***radioaktive Abfälle*** können gefährliche Eigenschaften – nämlich krebserzeugend, erbgutverändernd oder fortpflanzungsgefährdend – haben, die sie zu gefährlichen Abfällen machen. Allerdings unterliegen radioaktive Stoffe innerhalb der EU gesonderten Vorschriften (Richtlinie 2011/70/Euratom des Rates). Unternehmen, die radioaktives Material verwenden, aus dem radioaktive Abfälle entstehen könnten, die den EU-Vorschriften unterliegen, sollten sich darüber im Klaren sein. Radioaktive Abfälle sollten anhand des Vorhandenseins von Radionukliden oberhalb der behördlichen Freigabeschwellen identifiziert werden.

Regulierungsstandards zur Festlegung der Einzelheiten des Inhalts und der Darstellung von Informationen in Zusammenhang mit dem Grundsatz der Vermeidung erheblicher Beeinträchtigungen, des Inhalts, der Methoden und der Darstellung von Informationen in Zusammenhang mit Nachhaltigkeitsindikatoren und nachteiligen Nachhaltigkeitsauswirkungen sowie des Inhalts und der Darstellung von Informationen in Zusammenhang mit der Bewerbung ökologischer oder sozialer Merkmale und nachhaltiger Investitionsziele in vorvertraglichen Dokumenten, auf Internetseiten und in regelmäßigen Berichten (C(2022) 1931, ABl. L 196 vom 25.7.2022, S. 1).

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101. ***Radioaktive Abfälle*** können in einer Vielzahl von Gegenständen wie medizinischer, Forschungs- und Industrieausrüstung oder Rauchdetektoren oder in Materialien wie Schlämmen enthalten sein.

102. Nachstehend sind Gefahrenpiktogramme für jede Gefahrenklasse aufgeführt.

Gefahren-piktogramm	**Aussage des Piktogramms, Symbol und Klasse**	**Was ist damit gemeint?**
	**„Gas unter Druck“** *Symbol: Gasflasche* Physikalische Gefahren	• Enthält Gas unter Druck; kann bei Erwärmung explodieren • Enthält tiefgekühltes Gas; kann Kälteverbrennungen oder Verletzungen verursachen
	**„Explosiv“** *Symbol: explodierende Bombe* Physikalische Gefahren	• Instabil, explosiv • Explosiv; Gefahr der Massenexplosion • Explosiv; große Gefahr durch Splitter, Spreng- und Wurfstücke • Explosiv; **Gefahr** durch Feuer, Luftdruck oder Splitter, Spreng- und Wurfstücke • Gefahr der Massenexplosion bei Feuer
	**„Oxidierend“** *Symbol: Flamme über einem Kreis* Physikalische Gefahren	• Kann Brand verursachen oder verstärken; Oxidationsmittel • Kann Brand oder Explosion verursachen; starkes Oxidationsmittel

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	**„Entzündbar“** *Symbol: Flamme* Physikalische Gefahren	• **Gas** extrem **entzündbar** • Gas entzündbar • Aerosol extrem entzündbar • Aerosol entzündbar • Flüssigkeit und Dampf leicht entzündbar • Flüssigkeit und Dampf entzündbar • Feststoff entzündbar
	**„Korrosiv“** *Symbol: Korrosion* Physikalische Gefahren / Gesundheits-gefahren	• Kann gegenüber Metallen korrosiv sein • Verursacht schwere Verätzungen der Haut und schwere Augenschäden
	**„Gesundheits-gefahr / Die Ozonschicht schädigend“** *Symbol: Ausrufezeichen* Gesundheits-gefahren	• Kann die Atemwege reizen • Kann Schläfrigkeit und Benommenheit verursachen • Kann **allergische Hautreaktionen** verursachen. • Verursacht schwere Augen**reizung** • Verursacht Hautreizungen • Gesundheitsschädlich bei Verschlucken • Gesundheitsschädlich bei Hautkontakt • Gesundheitsschädlich bei Einatmen • Schädigt die öffentliche Gesundheit und die Umwelt durch Ozonabbau in der äußeren Atmosphäre

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	**„Akute Toxizität“** *Symbol: Totenkopf mit gekreuzten Knochen* Gesundheits-gefahren	• Lebensgefahr bei Verschlucken • Lebensgefahr bei Hautkontakt • Lebensgefahr bei Einatmen • Giftig bei Verschlucken • Giftig bei Hautkontakt • Giftig bei Einatmen
	**„Ernste Gesundheits-gefahr“** *Symbol: Gesundheits-gefahren* Gesundheits-gefahren	• Kann bei Verschlucken und **Eindringen in die Atemwege** tödlich sein • **Schädigt die Organe** • Kann die Organe schädigen • Kann die Fruchtbarkeit beeinträchtigen oder das Kind im Mutterleib schädigen • Kann vermutlich die Fruchtbarkeit beeinträchtigen oder das Kind im Mutterleib schädigen • Kann Krebs verursachen • Kann vermutlich Krebs erzeugen • Kann **genetische Defekte** verursachen • Kann vermutlich **genetische Defekte verursachen** • Kann bei Einatmen Allergie, asthmaartige Symptome oder Atembeschwerden verursachen
	**„Gefährlich für die Umwelt“** *Symbol: Umwelt* Umwelt-gefahren	• Sehr giftig für Wasserorganismen, mit langfristiger Wirkung • Giftig für Wasserorganismen, mit langfristiger Wirkung

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Piktogramme, die gefährliche Eigenschaften angeben, Anhang V der Verordnung (EG) Nr. 1272/2008 über die Einstufung, Kennzeichnung und Verpackung von Stoffen und Gemischen.

103. Seine Angaben zum Abfallaufkommen und zur Umleitung von Abfällen aus der Beseitigung sollte das Unternehmen vorzugsweise in Gewichtseinheiten (z. B. kg oder Tonnen) bereitstellen. Sollte das Unternehmen Gewichtseinheiten jedoch für ungeeignet halten, können die genannten Kennzahlen alternativ in Volumeneinheiten (z. B. m^3) ausgedrückt werden.

104. Bei seinen Informationen über die jährliche Gesamtmenge der Abfälle, die zum ***Recycling*** oder zur Wiederverwendung umgeleitet werden, sollte das Unternehmen die Abfälle berücksichtigen, die sortiert und Recycling- oder Wiederverwendungseinrichtungen zugeführt werden (z. B. Menge der in Recyclingbehältern gesammelten Abfälle oder Sortierung von Abfällen in bestimmte Materialkategorien und deren Abgabe bei Abfallbehandlungsanlagen), und nicht die Abfälle, die tatsächlich recycelt oder wiederverwendet werden.

105. Bei seinen Angaben zu Abfällen kann das Unternehmen die folgenden Tabellen heranziehen.

	Abfallaufkommen (z. B. in Tonnen)		
	Gesamtabfallaufkommen, davon:		
		Abfälle, die zum Recycling oder zur Wiederverwendung umgeleitet werden	*Abfälle, die der Beseitigung zugeführt werden*
Nicht gefährliche Abfälle			
Abfallart 1			
Abfallart 2			
…			
Gefährliche Abfälle			
Abfallart 1			
…			

106. Beispiele für ***gefährliche Abfälle***, die in kleinen Unternehmen anfallen können, sind Batterien, Altöl, Pestizide, quecksilberhaltige Geräte und Leuchtstofflampen.

107. Das Unternehmen kann weitere Aufschlüsselungen vorlegen, in denen weitere Arten nicht gefährlicher und ***gefährlicher Abfälle*** angegeben werden. Dafür kann es das Verzeichnis der Abfallbeschreibungen heranziehen, die in den Sozialkennzahlen des Europäischen Abfallkatalogs zu finden sind.

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Leitlinien zum jährlichen Massenstrom der verwendeten relevanten Materialien

108. Der jährliche Massenstrom ist ein Indikator, der mit den EMAS-Anforderungen an die Effizienz des Materialverbrauchs im Einklang steht und die Abhängigkeit eines Unternehmens von bestimmten Materialien in seiner Geschäftstätigkeit veranschaulicht (z. B. Holz und Stahl im Baugewerbe). Das Unternehmen muss in diesem Zusammenhang Informationen über die verwendeten Materialien bereitstellen, was sowohl von Lieferanten erworbene Materialien als auch aus der eigenen Produktion stammende Materialien einschließt. Um den jährlichen Massenstrom der verwendeten relevanten Materialien rechnerisch zu ermitteln, muss das Unternehmen zunächst die spezifischen wesentlichen Materialien bestimmen, von denen seine Geschäftstätigkeit abhängt und deren Materialeffizienz bewertet werden muss (z. B. Materialeffizienz von Holz). Werden verschiedene Arten von Materialien verwendet, muss das Unternehmen den jährlichen Massenstrom (d. h. das Gesamtgewicht jedes verwendeten relevanten Materials, z. B. gekaufte Tonnen Holz) für jedes wesentliche Material getrennt in geeigneter Weise angeben, z. B. aufgeschlüsselt nach Verwendung (*EMAS-Nutzerhandbuch*). Der Massenstrom der verwendeten relevanten Materialien ergibt sich aus der Summe des Gewichts aller verwendeten Materialien, einschließlich Rohstoffe, Hilfsstoffe, Einsatzstoffe, Halbzeuge usw. (ausgenommen Energiequellen und Wasser). Dieser Indikator ist vorzugsweise in Gewichtseinheiten (z. B. Kilogramm oder Tonnen), Volumeneinheiten (z. B. m^3) oder anderen branchenüblichen Maßeinheiten anzugeben.

Leitlinien zur Ermittlung von Prozessen in den Bereichen Herstellung, Baugewerbe/Bau und/oder Abfüllen/Verpacken

109. Zur Ermittlung von Prozessen in den Bereichen Herstellung, Baugewerbe/Bau und/oder Abfüllen/Verpacken kann sich das Unternehmen auf Anhang I der Verordnung (EU) 2023/137 und die Tätigkeiten beziehen, die dort unter Abschnitt C – Herstellung, Abschnitt F – Baugewerbe/Bau sowie Abschnitt O Klasse 82.92 „Abfüllen und Verpacken“ fallen.

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1.3. Leitlinien zum Basismodul – Sozialkennzahlen

B8 – Arbeitskräfte – Allgemeine Merkmale

110. Vollzeitäquivalente (VZÄ) entsprechen der **Zahl der Vollzeitstellen in einem Unternehmen**. Sie **können berechnet werden, indem die geplante Arbeitszeit eines Beschäftigten (effektiv in einer Woche geleistete Gesamtarbeitsstunden) durch die vom Arbeitgeber für eine Vollzeitarbeitswoche festgelegte Arbeitszeit (von Vollzeitbeschäftigten geleistete Gesamtarbeitsstunden) geteilt wird**. Wenn ein Beschäftigter 25 Wochenstunden in einem Unternehmen arbeitet, in dem die Vollzeitwoche 40 Stunden beträgt, entspricht dies beispielsweise 0,625 VZÄ (d. h. 25/40 Stunden).

111. Die Beschäftigtenzahl ist die Gesamtzahl der Beschäftigten des Unternehmens, wobei entweder der Stand am Ende des Berichtszeitraums oder der über den Berichtszeitraum hinweg ermittelte Durchschnittswert angegeben wird.

Leitlinien zur Darstellung von Informationen über die Vertragsarten der Beschäftigten

112. Die folgende Tabelle zeigt, wie die Angaben zu ***Beschäftigten*** nach Art des Arbeitsvertrags dargestellt werden können.

Art des Vertrags	Zahl der Beschäftigten (Anzahl der Personen oder Vollzeitäquivalente)
Zeitverträge	
Unbefristete Verträge	
Beschäftigte insgesamt	

113. Die folgende Tabelle zeigt, wie die Angaben zu ***Beschäftigten*** nach Geschlecht dargestellt werden können.

Geschlecht	Zahl der Beschäftigten (Anzahl der Personen oder Vollzeitäquivalente)
Männlich	
Weiblich	
Andere	
Nicht angegeben	
Beschäftigte insgesamt	

114. Das Recht einiger Mitgliedstaaten der Europäischen Union sieht beim Geschlechtseintrag von Personen eine dritte Option – häufig neutral – vor, was in der vorstehenden Tabelle unter „Andere“ zu erfassen ist. Wenn das Unternehmen jedoch Daten über ***Beschäftigte*** unter Umständen angibt, in denen dies nicht möglich ist, kann es dies erläutern und angeben, dass die Kategorie „Andere“ nicht anwendbar ist. Die Kategorie „keine Angabe“ gilt für Beschäftigte, die ihre Geschlechtsidentität nicht offenlegen.

115. Die folgende Tabelle zeigt, wie die Angaben zu ***Beschäftigten*** nach Land dargestellt werden können.

Land (des Arbeitsvertrags)	Zahl der Beschäftigten (Anzahl der Personen oder Vollzeitäquivalente)
Land A	
Land B	
Land C	
Land D	
Beschäftigte insgesamt	

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116. Die Definitionen und Arten von Arbeitsverträgen können von Land zu Land unterschiedlich sein. Hat das Unternehmen ***Beschäftigte***, die in mehr als einem Land arbeiten, so verwendet es für die Berechnung der Daten auf Länderebene die Definitionen gemäß den nationalen Rechtsvorschriften der Länder, in denen die Beschäftigten ansässig sind. Diese Daten auf Länderebene werden dann zur Berechnung der Gesamtzahlen addiert, wobei Unterschiede in den nationalen rechtlichen Definitionen außer Acht gelassen werden.

117. Die Beschäftigtenfluktuation bezieht sich auf ***Beschäftigte***, die freiwillig oder wegen Entlassung, Eintritt in den Ruhestand oder einem tödlichen Arbeitsunfall aus dem Unternehmen ausscheiden.

118. Die Fluktuation sollte anhand der nachstehenden Gleichung berechnet werden.

$$\frac{Anzahl\ der\ Beschäftigten, die\ das\ Unternehmen\ im\ Berichtsjahr\ verlassen\ haben}{Durchschnittliche\ Anzahl\ der\ Beschäftigen\ im\ Berichtsjahr} x\ 100$$

B9 – Arbeitskräfte – Gesundheitsschutz und Sicherheit

Leitlinien zur Quote der meldepflichtigen Arbeitsunfälle

119. Ausgehend von der Annahme, dass ein Vollzeitbeschäftigter 2000 Stunden pro Jahr arbeitet, gibt die Quote die Anzahl der Arbeitsunfälle je 100 Vollzeitbeschäftigten über einen jährlichen Zeitraum an. Kann das Unternehmen die Zahl der geleisteten Arbeitsstunden nicht direkt berechnen, so kann es diese auf der Grundlage der üblichen oder Standardarbeitszeiten schätzen.

120. Die Quote der ***meldepflichtigen Arbeitsunfälle*** von ***Beschäftigten*** sollte anhand der nachstehenden Gleichung berechnet werden.

$$\frac{Anzahl\ der\ Arbeitsunfälle\ im\ Berichtsjahr}{Gesamtanzahl\ der\ von\ allen\ Beschäftigten\ in\ einem\ Jahr\ geleisteten\ Arbeitsstunden} x\ 200\ 000$$

Beispiel

121. Unternehmen A hat im Berichtsjahr drei Arbeitsunfälle gemeldet. Unternehmen A hat 40 ***Beschäftigte***, die insgesamt 80 000 Arbeitsstunden (40 * 2000) im Jahr geleistet haben.

Die Quote der ***meldepflichtigen Arbeitsunfälle*** beträgt 3/80 000 * 200 000 = 7,5.

Leitlinien zur Zahl der Todesfälle infolge arbeitsbedingter Verletzungen und arbeitsbedingter Erkrankungen

122. Arbeitsbedingte Verletzungen und arbeitsbedingte Erkrankungen ergeben sich aus Gefährdungen am Arbeitsplatz.

123. Bei Telearbeit gelten Verletzungen und Erkrankungen als arbeitsbedingt, wenn sie direkt mit der Ausübung der Beschäftigung zusammenhängen und nicht auf die allgemeine häusliche Umgebung zurückzuführen sind.

124. Verletzungen und Erkrankungen, die während einer arbeitsbedingten Reise auftreten, gelten als arbeitsbedingt, wenn der ***Beschäftigte*** zum Zeitpunkt des Eintretens der Verletzung oder der Erkrankung eine Tätigkeit im Interesse des Arbeitgebers ausgeübt hat. Unfälle, die sich bei Fahrten außerhalb der Verantwortung des Unternehmens ereignen (d. h. auf dem regulären Arbeitsweg), unterliegen den geltenden nationalen

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Rechtsvorschriften, in denen geregelt ist, ob sie als arbeitsbedingt eingestuft werden oder nicht.

125. Eine psychische Erkrankung gilt als arbeitsbedingt, wenn der Beschäftigte sie freiwillig gemeldet hat und wenn ein zugelassener Angehöriger der Gesundheitsberufe ein Gutachten ausgestellt hat, aus dem hervorgeht, dass die betreffende Erkrankung tatsächlich arbeitsbedingt ist, und dieses Gutachten ebenfalls gemeldet wurde. Gesundheitsprobleme, die sich aus Rauchen, Drogen- und Alkoholmissbrauch, Bewegungsmangel, ungesunder Ernährung und psychosozialen Faktoren ergeben, die nicht mit der Arbeit zusammenhängen, gelten nicht als arbeitsbedingt.

126. Todesfälle infolge arbeitsbedingter Verletzungen und Todesfälle infolge arbeitsbedingter Erkrankungen können vom Unternehmen getrennt angegeben werden.

B10 – Arbeitskräfte – Vergütung, Tarifverhandlungen und Schulung

Leitlinien zur Vergütung: Mindestlohn

127. Der Begriff „Mindestlohn“ bezieht sich auf das Mindestarbeitsentgelt je Stunde oder andere Zeiteinheit. Je nach Land kann der Mindestlohn gesetzlich oder in ***Tarifverträgen*** festgelegt sein. Das Unternehmen legt den Mindestlohn zugrunde, der in dem Land gilt, auf das sich seine Angaben beziehen.

128. Für die niedrigste Entgeltkategorie ohne Praktikanten und Auszubildende dient der Mindestlohn als Grundlage für die Berechnung des Einstiegslohns. Daher umfasst der Einstiegslohn das ***Entgelt*** in Höhe des Mindestlohns sowie zusätzliche feste Zahlungen, die ***Beschäftigten*** dieser Kategorie garantiert werden.

Leitlinien zur Vergütung: prozentuales Gefälle zwischen weiblichen und männlichen Beschäftigten

129. Mit dem Parameter für das prozentuale Verdienstgefälle zwischen weiblichen und männlichen ***Beschäftigten*** wird der Grundsatz der Gleichstellung der Geschlechter angesprochen, der gleiches ***Entgelt*** für gleichwertige Arbeit vorschreibt. Das Entgeltgefälle ist definiert als die Differenz zwischen dem durchschnittlichen Entgeltniveau von weiblichen und männlichen Beschäftigten, ausgedrückt als Prozentsatz des durchschnittlichen Entgeltniveaus männlicher Beschäftigter.

130. Bei der rechnerischen Ermittlung dieses Parameters sind alle ***Beschäftigten*** einzubeziehen. Darüber hinaus sollten für weibliche und männliche Beschäftigte zwei getrennte Berechnungen des durchschnittlichen ***Entgelts*** vorgenommen werden. Siehe die nachstehende Gleichung:

$$\frac{\textit{Durchschnittliches Bruttostundenentgelt der männlichen Beschäftigten} - \textit{Durchschnittliches Bruttostundenentgelt der weiblichen Beschäftigten}}{\textit{Durchschnittliches Bruttostundenentgelt der männlichen Beschäftigten}} \; x\,100$$

131. Je nach Vergütungspolitik des Unternehmens bezieht sich das Bruttoentgelt auf alle folgenden Bestandteile:

(a) Grundgehalt, d. h. die Summe aus garantierter, kurzfristiger, unveränderlicher Barvergütung;

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(b) Geldleistungen, d. h. die Summe aus Grundgehalt und Barzulagen, Bonuszahlungen, Provisionen, Bargewinnbeteiligungen und anderen Formen variabler Barzahlungen, und

(c) Sachleistungen[5].

132. Das Bruttoentgelt ist die Summe aller vorstehend aufgeführten Bestandteile, soweit diese zutreffend.

133. Das durchschnittliche Bruttostundenentgelt ist das wöchentliche/jährliche Bruttoentgelt geteilt durch die durchschnittlich geleisteten Wochen-/Jahresarbeitsstunden.

Beispiel

134. Unternehmen A hat insgesamt *X* männliche und *Y* weibliche ***Beschäftigte***. Das Bruttostundenentgelt der männlichen Beschäftigten beträgt 15 EUR und das Bruttostundenentgelt der weiblichen Beschäftigten 13 EUR.

135. Das durchschnittliche Bruttostundenentgelt der männlichen ***Beschäftigten*** ergibt sich aus der Summe ihrer gesamten Bruttostundenzahlungen geteilt durch die Gesamtanzahl der männlichen Beschäftigten. Das durchschnittliche Bruttostundenentgelt der weiblichen Beschäftigten ergibt sich aus der Summe ihrer gesamten Bruttostundenzahlungen geteilt durch die Gesamtanzahl der weiblichen Beschäftigten.

136. Das prozentuale Entgeltgefälle zwischen männlichen und weiblichen ***Beschäftigten*** wird nach folgender Gleichung berechnet:

$$\frac{15-13}{15} x\ 100 = \ 13{,}3\%$$

Leitlinien zur Abdeckung durch Tarifverträge

137. Tarifbeschäftigte sind ***Beschäftigte***, die durch ***Tarifverträge*** abgedeckt sind, d. h. auf die das Unternehmen den Vertrag anwenden muss. Beschäftigte, die durch mehrere Tarifverträge abgedeckt sind, müssen nur einmal gezählt werden. Ist keiner der Beschäftigten durch Tarifverträge abgedeckt, ist der Prozentsatz gleich Null.

138. Der Prozentsatz der ***Beschäftigten***, die durch ***Tarifverträge*** abgedeckt sind, wird nach folgender Gleichung berechnet.

$$\frac{Anzahl\ der\ Beschäftigten, die\ von\ einem\ Tarifvertrag\ abgedeckt\ sind}{Anzahl\ der\ Beschäftigten} x\ 100$$

139. Die für diese Angabepflicht erforderlichen Informationen können als Abdeckungsquote angegeben werden, wenn die Abdeckung durch ***Tarifverträge*** bei 0-19 %, 20-39 %, 40-59 %, 60-79 % oder 80-100 % liegt.

140. Diese Anforderung zielt nicht darauf ab, den Prozentsatz der ***Beschäftigten***, die durch einen Betriebsrat vertreten sind oder Gewerkschaften angehören, zu ermitteln; dieser Prozentsatz kann anders lauten. Der Prozentsatz der tarifvertraglich abgedeckten Beschäftigten kann höher sein als der Prozentsatz gewerkschaftlich organisierter Beschäftigter, wenn die ***Tarifverträge*** sowohl für Gewerkschaftsmitglieder als auch für Nichtgewerkschaftsmitglieder gelten.

[5] Zum Beispiel Autos, private Krankenversicherungen, Lebensversicherungen und Wellnessprogramme.

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1.4. Leitlinien zum Basismodul – Kennzahlen der Unternehmenspolitik

B11 – Verurteilungen und Geldstrafen wegen Korruption und Bestechung

141. ***Korruption*** und ***Bestechung*** fallen unter den Nachhaltigkeitsaspekt der ***Unternehmenspolitik***.

142. Nach Nummer 43 muss das Unternehmen die Anzahl der Verurteilungen bzw. den Gesamtbetrag der Geldstrafen angeben, die wegen Verstößen gegen Rechtsvorschriften zur Bekämpfung von ***Korruption*** und ***Bestechung*** ergangen sind.

Leitlinien zu Verurteilungen

143. Verurteilungen wegen Verstößen gegen Vorschriften zur Bekämpfung von ***Korruption*** und ***Bestechung*** beziehen sich auf jedes Urteil eines Strafgerichts gegen eine Person oder ein Unternehmen wegen einer Straftat im Zusammenhang mit Korruption und Bestechung, z. B. wenn diese Gerichtsentscheidungen in das Strafregister des verurteilenden Mitgliedstaats der Europäischen Union eingetragen werden.

Leitlinien zu Geldbußen

144. Geldstrafen wegen Verstößen gegen Vorschriften zur Bekämpfung von ***Korruption*** und ***Bestechung*** beziehen sich auf Zwangsgeldstrafen, die wegen solcher Verstöße von einem Gericht, einem offiziellen Gremium oder einer anderen staatlichen Stelle verhängt werden und an eine öffentliche Kasse gezahlt werden.

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Zusatzmodul (umfassendes Modul): Leitlinien

145. Die in den folgenden Abschnitten enthaltenen Leitlinien sollen die Anwendung der Angabepflichten erleichtern, die in Anhang I Nummern 44 bis 65 der Empfehlung der Kommission für einen Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen dargelegt sind.

146. Die nachstehenden Leitlinien sind als Teil eines Ökosystems vorgesehen, das auch die Entwicklung weiterer Unterstützungsleitlinien durch die EFRAG, weitere digitale Instrumente und Unterstützung bei der Umsetzung (Bildungstätigkeiten, Einbeziehung der Interessenträger u. a.) umfassen könnte, mit denen das Verständnis einiger der technischen Elemente der Leitlinien erleichtert wird.

147. Diese Leitlinien sollen die Zusammenstellung von Kennzahlen im Zusatzmodul unterstützen.

1.5. Leitlinien zum Zusatzmodul – Allgemeine Informationen

C1 – Strategie: Geschäftsmodell und Nachhaltigkeit – Zugehörige Initiativen

148. Bei der Beschreibung der wichtigsten ***Verbraucher***- und Lieferantenbeziehungen nach Nummer 47 Buchstabe c muss das Unternehmen die geschätzte Zahl der Lieferanten sowie die mit ihnen verbundenen Sektoren und geografischen Gebiete (d. h. Länder) angeben.

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C2 – Beschreibung von Verfahrensweisen, Richtlinien und künftigen Initiativen für den Übergang zu einer nachhaltigeren Wirtschaft

149. Bei der Angabe von Datenpunkten zu C2 können Unternehmen die folgende Vorlage verwenden.

	Wenn Sie bei Angabe B2 die Frage nach bestehenden Verfahrensweisen/ Richtlinien/künftigen Initiativen mit JA beantwortet haben, beschreiben Sie diese bitte kurz zusammen mit den daraus resultierenden Maßnahmen. (Falls die Verfahrensweise/ Richtlinien/künftige Initiative Lieferanten oder Kunden betrifft, muss das Unternehmen dies angeben.)	Wenn Sie bei Angabe B2 die Frage nach den festgelegten Zielen mit JA beantwortet haben, legen Sie diese bitte dar.	Das Unternehmen kann die höchste Personalebene angeben, die für die Umsetzung der Richtlinien verantwortlich ist, sofern im Unternehmen Festlegungen dazu bestehen.
Klimawandel			

Umweltverschmutzung			
Wasser- und Meeresressourcen			
Biodiversität und Ökosysteme			
Kreislaufwirtschaft			
Arbeitskräfte des Unternehmens			
Arbeitskräfte in der Wertschöpfungskette			
Betroffene Gemeinschaften			
Verbraucher und Endnutzer			
Unternehmenspolitik			

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1.6. Leitlinien zum Zusatzmodul – Umweltkennzahlen

Erwägungen bei der Angabe von Treibhausgasemissionen unter B3 (Basismodul)

150. Um festzustellen, ob Angaben zu den Scope-3-Emissionen im Sinne von Nummer 50 angemessen sind, kann das Unternehmen seine gesamten Scope-3-Treibhausgasemissionen auf der Grundlage der 15 Scope-3-Kategorien des THG-Protokolls anhand geeigneter Schätzungen überprüfen; in seinem Bericht kann es dann gegebenenfalls auf die dabei erlangten Informationen verweisen. Dies ermöglicht es dem Unternehmen, seine signifikanten Scope-3-Kategorien auf der Grundlage der Größenordnung ihrer geschätzten Treibhausgasemissionen und anderer Kriterien gemäß dem Rechnungslegungs- und Berichterstattungsstandard des THG-Protokolls für die Wertschöpfungskette von Unternehmen (Scope 3) (Fassung von 2011, S. 61 und S. 65-68) oder gemäß dem Anhang H.3.2 der Norm EN ISO 14064-1:2018, z. B. Finanzausgaben, Einfluss, zugehörige Übergangsrisiken und Chancen oder Standpunkte der Interessenträger, zu ermitteln und anzugeben.

151. Bei KMU, die in den Bereichen verarbeitendes Gewerbe, Agrarlebensmittel, Immobilienbau und Abfüllen/Verpacken tätig sind, treten wahrscheinlich bedeutende Scope-3-Kategorien auf (*CDP Technical Note: Relevance of Scope 3 Categories by Sector*, *2024*), die in der Branche des Unternehmens als berichtsrelevant angesehen werden.

C3 – THG-Reduktionsziele und Übergang für den Klimaschutz

152. Emissionsreduktionen können gleichzeitig eine Herausforderung und eine Chance für ein Unternehmen darstellen, da sie häufig Änderungen der strategischen und operativen Realität des Unternehmens erfordern. Für das Ziel der Emissionsreduktion kann es notwendig sein, die strategischen und finanziellen Prioritäten zu überprüfen. Die Dekarbonisierung kann erhebliche Anfangsinvestitionen erfordern, z. B. in die Elektrifizierung des Fahrzeugbestands, die Einführung neuer Technologien zur Senkung des Energieverbrauchs oder die Entwicklung neuer Produktlinien, bei denen weniger CO_2-intensive Materialien eingesetzt werden. Andererseits kann es durch die Einführung CO_2-armer Lösungen mit dem Ziel der THG-Emissionsreduktion gelingen, die Kosten für gekaufte Energie und Materialien erheblich zu senken. Unternehmen, die den Weg der Dekarbonisierung beschreiten, stehen oft vor der Herausforderung, dass ihre Geschäftsmodelle oder ihre täglichen Geschäftsvorgänge umfassend angepasst werden müssen. Beispielsweise muss ein Logistik- und Lieferdienstunternehmen möglicherweise sein Flottenmanagement umgestalten, um potenzielle Störungen der Betriebsabläufe, die sich aus der Notwendigkeit regelmäßiger Fahrzeugaufladungen ergeben, so gering wie möglich zu halten. Ein Konsumgüterhersteller, der beabsichtigt, eine Komponente seines Produkts durch eine nachhaltige, CO_2-arme Alternative zu ersetzen, muss möglicherweise Zeit und Ressourcen für Produktinnovationen und die Suche nach neuen Lieferanten aufwenden. Diese Bemühungen können wiederum Kostensenkungen, den Zugang zu neuen Märkten, die Schaffung neuer Arbeitsplätze und die Mobilisierung zusätzlicher Finanzmittel ermöglichen, weshalb THG-Emissionsreduktionen nicht nur eine Herausforderung darstellen, sondern auch strategische Geschäftsmöglichkeiten bieten. In diesem Zusammenhang sind ***Ziele*** für THG-Emissionsreduktionen ein wichtiges Instrument, um der Notwendigkeit eines nachhaltigen Übergangs gerecht zu werden, da sie es den Unternehmen ermöglichen, den Wandel auf systematische, kontrollierte und organisierte Weise zu bewältigen.

153. Mit einem THG-Emissionsreduktionsziel verpflichtet sich ein Unternehmen, in einem künftigen Jahr weniger THG-Emissionen zu erzeugen als in einem gewählten Basisjahr gemessen wurden. Zu den ***Maßnahmen***, die zu einer Emissionsreduktion führen können, gehören beispielsweise Elektrifizierung, Strom aus erneuerbaren Energiequellen, Entwicklung nachhaltiger Produkte usw. Im Rahmen der Angabe C3 muss das Unternehmen THG-Emissionsreduktionsziele für seine Scope-1- und Scope-2-Emissionen angeben.

154. Entnahmen und vermiedene Emissionen werden nicht als Reduktion der THG-Bruttoemissionen des Unternehmens angerechnet. Dies ist auf die wichtige Unterscheidung zwischen den Bilanzierungsverfahren für THG-Bruttoemissionen (inventarbezogene Bilanzierung) und für THG-Entnahmen und vermiedene Emissionen (projekt- oder interventionsbezogene Bilanzierung) zurückzuführen. Anhand der THG-Bruttoemissionen des Unternehmens können die tatsächlich in die Umwelt freigesetzten Emissionen verfolgt werden, wodurch eine kohärente und vergleichbare Ausgangsbasis für die Festlegung von THG-Reduktionszielen geschaffen wird. Vermiedene Emissionen und CO_2-Entnahmen hingegen beziehen sich auf spezifische Projekttätigkeiten des Unternehmens, weshalb ihre Bilanzierung getrennt von den THG-Bruttoemissionen erfolgt.

155. Um dieser Praxis zu folgen, muss das Unternehmen seine THG-Bruttoemissionen und andere ***Auswirkungen***, die darin nicht erfasst sind, wie THG-Entnahmen und vermiedene Emissionen, getrennt verfolgen. Entnahmen beziehen sich auf die Entfernung von Treibhausgasen aus der Atmosphäre durch bewusste menschliche Aktivitäten. Beispiele

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für solche Tätigkeiten sind Pflanzenanbau (Transfer von atmosphärischem CO_2 durch Fotosynthese) und die direkte CO_2-Abscheidung aus der Luft; sie sind in der Regel mit der anschließenden Speicherung von CO_2 verbunden. Als vermiedene THG-Emissionen werden üblicherweise Emissionen bezeichnet, die andernfalls angefallen wären, aber aufgrund der Tätigkeiten des Unternehmens nicht angefallen sind. Ein Beispiel wäre die Einführung neuer Produkte und Technologien, durch die sich die Nachfrage nach ihren CO_2-intensiven Äquivalenten verringert, z. B. Isolierungslösungen in einem Gebäude, durch die der Bedarf an Energiedienstleistungen in diesem Gebäude vermieden wird. Weitere Informationen zu den Konzepten im Zusammenhang mit CO_2-Entnahmen und vermiedenen Emissionen enthalten die Leitlinien *GHG Protocol Land Sector and Removals Guidance*.

156. Ein Basisjahr ist ein früheres Jahr, im Vergleich zu dem die aktuellen THG-Emissionen des Unternehmens gemessen werden können. Im Allgemeinen sollte das Basisjahr ein Jahr sein, das noch nicht lange zurückliegt und für die THG-Emissionen des Unternehmens repräsentativ ist und für das überprüfbare Daten vorliegen.

157. Das Zieljahr ist das in der Zukunft liegende Jahr, in dem das Unternehmen eine bestimmte absolute oder prozentuale THG-Emissionsreduktion erreicht haben will. Für ein kurzfristiges ***Ziel*** sollte es sich dabei um das erste bis dritte Jahr nach dem Basisjahr handeln. Auch längerfristige Ziele können aufgenommen werden, die beispielsweise nach zwanzig oder dreißig Jahren (z. B. 2040 oder 2050) erreicht sein sollen. Den Unternehmen wird empfohlen, Zielwerte mindestens für das kurzfristige Zieljahr 2030 und, wenn möglich, für das langfristige Zieljahr 2050 anzugeben. Für den Zeitraum ab 2030 wird empfohlen, das Basis- und das Zieljahr für die THG-Emissionsreduktionen nach jedem Fünfjahreszeitraum zu aktualisieren.

158. Bei der Festlegung eines ***Ziels*** sollten die Unternehmen die vorhandenen wissenschaftlichen Erkenntnisse zur THG-Minderung berücksichtigen. Die SBTi (Science Based Targets Initiative) empfiehlt als sektorübergreifendes Ziel eine THG-Emissionsreduktion um 42 % bis 2030 und um 90 % bis 2050 (Basisjahr 2020). Die SBTi schlägt außerdem einen vereinfachten Weg zur Festlegung von Zielen für kleine und mittlere Unternehmen vor[6]. Auch branchenbezogen gibt es spezifische Pfade, die von den Unternehmen bei der Festlegung ihrer THG-Emissionsreduktionsziele berücksichtigt werden können.

159. Es gibt einige einfache ***Maßnahmen***, mit denen das Unternehmen eine rasche Reduktion sowohl der direkten als auch der indirekten Emissionen erreichen kann. Einige Maßnahmen sind einfach und können dennoch zu einer nennenswerten Emissionsreduktion führen und das Unternehmen bei der Erreichung seiner ***Ziele*** unterstützen. So wird beispielsweise die Elektrifizierung des Fahrzeugbestands durch den Austausch von fossil betriebenen Fahrzeugen durch Elektrofahrzeuge eine Emissionsreduktion bewirken, sobald die bisherige Flotte ersetzt wurde. Dies kann insbesondere für Unternehmen, die auf Transport angewiesen sind, eine nennenswerte Emissionsminderung mit sich bringen. Ebenso ist das Ersetzen des Autos bei arbeitsbedingten Fahrten und Geschäftsreisen durch CO_2-arme Alternativen wie Fahrrad oder öffentliche Verkehrsmittel eine wirksame, einfache und erreichbare Dekarbonisierungsmaßnahme. Ein weiterer niederschwelliger Ansatzpunkt ist die Überprüfung des internen Energiemanagements, dessen Umstellung auf energieeffiziente Geräte und die Integration der Wartung in den Routinebetrieb. Durch die regelmäßige

[6] SBTi bietet KMU auch Ressourcen, um wissenschaftlich fundierte Ziele festzulegen.

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Wartung von Anlagen und Maschinen und, soweit möglich, deren Ersetzung durch energieeffizientere Alternativen kann das Unternehmen seinen Energieverbrauch senken. Zu diesen Anlagen gehören z. B. Heizkessel, Telekommunikationssysteme, Wärmepumpen, Klimaanlagen usw. Mithilfe regelmäßiger Wartung kann ihr effizienter Betrieb sichergestellt, der Verschleiß minimiert und die Abfallmenge verringert werden. Die Automatisierung von Systemen und die Verwendung von Zeitschaltuhren zur Festlegung von Nutzungszeiträumen ermöglichen es dem Unternehmen, die Emissionen solcher Anlagen noch weiter zu senken.

160. In einem Übergangsplan für den Klimaschutz ist eine Reihe von gegenwärtigen und künftigen ***Maßnahmen*** festgelegt, mit denen das Geschäftsmodell, die Geschäftsstrategie und der Geschäftsbetrieb des Unternehmens auf die übergeordnete weltweite Zielsetzung ausgerichtet werden sollen, die Erderwärmung auf 1,5 °C zu begrenzen. Unterlegt durch ein mit dieser Zielsetzung vereinbares THG-Reduktionsziels liegt die Bedeutung eines solchen Übergangsplans darin, dass er es ermöglicht, zu verstehen, wie das Unternehmen zu einer kohlenstoffarmen Wirtschaft übergehen wird, und die dabei erzielten Fortschritte zu verfolgen. Ein Übergangsplan für den Klimaschutz dient als Mechanismus für Rechenschaftslegung und Transparenz und veranlasst die Unternehmen, glaubwürdige Wege für den Klimaschutz durch ihre Maßnahmen zu entwickeln.

161. Die Aufstellung eines glaubwürdigen Übergangsplans für das Unternehmen sollte etwa durch folgende Elemente unterstützt werden: a) Festlegung klarer Zuständigkeiten und Aufgaben; b) Integration des Plans in die Geschäftsstrategie und Finanzplanung des Unternehmens; c) Aufnahme von Informationen über Dekarbonisierungshebel und -pfade sowie von quantifizierbaren Indikatoren, die über vorab festgelegte Zeiträume überwacht werden können; d) Ermöglichung regelmäßiger Überprüfungen und Aktualisierungen, gegebenenfalls nach Konsultation der Interessenträger; und e) Erfassung des gesamten eigenen Geschäftsbetriebs und eines möglichst großen Teils der ***Wertschöpfungskette***, wobei etwaige Einschränkungen begründet werden sollten.

162. Legt ein Unternehmen ***Ziele*** nach Anhang IV Abschnitt B Buchstabe d der EMAS-Verordnung offen, kann es zur Erfüllung der VSME-Anforderung seine THG-Reduktionsziele verwenden, wenn es solche Ziele festgelegt hat. Das Unternehmen kann diese Angabe auch durch die Anwendung des EMAS-Umweltmanagementsystems und die Verknüpfung mit EN ISO 14001:2015 gemäß Anhang II Teil A, A.6.2.1, und Teil B, B.5, (Umweltziele) der EMAS-Verordnung unterstützen.

Leitlinien zur Ermittlung von Prozessen in den Bereichen Herstellung, Baugewerbe/Bau und/oder Abfüllen/Verpacken

163. Zur Ermittlung von Prozessen in den Bereichen Herstellung, Baugewerbe/Bau und/oder Abfüllen/Verpacken kann sich das Unternehmen auf Anhang I der Verordnung (EU) 2023/137 und die Tätigkeiten beziehen, die dort unter Abschnitt C – Herstellung, Abschnitt F – Baugewerbe/Bau sowie Abschnitt O Klasse 82.92 „Abfüllen und Verpacken“ fallen.

C4 – Klimabedingte Risiken

164. ***Klimabedingte Gefahren*** sind Triebkräfte für klimabedingte physische Risiken, die sich aus den Auswirkungen des Klimawandels auf das Unternehmen ergeben. Sie können unterteilt werden in akute Gefahren, die infolge bestimmter Ereignisse (wie Dürren, Hochwasser, starke Niederschläge und Wald-/Flächenbrände) eintreten, und chronische Gefahren, die infolge längerfristiger Klimaveränderungen (wie Temperaturänderungen,

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Anstieg des Meeresspiegels und Bodenerosion) eintreten (Delegierte Verordnung (EU) 2021/2139 der Kommission). Physische Risiken leiten sich aus klimabedingten Gefahren, der Exposition der Vermögenswerte und Tätigkeiten des Unternehmens gegenüber diesen Gefahren und der Empfindlichkeit des Unternehmens gegenüber diesen Gefahren ab. Beispiele für klimabedingte Gefahren sind Hitzewellen, zunehmende Häufigkeit extremer Wetterereignisse, Anstieg des Meeresspiegels, Überlaufen von Gletscherseen sowie Änderungen der Niederschlags- und Windmuster. Klimabedingte physische Risiken können anhand von Klimaszenarien wie dem IPCC-Szenario SSP5-8.5, die Verläufe mit hohen Emissionen berücksichtigen, ermittelt und modelliert werden.

165. ***Klimabedingte Übergangsereignisse*** können (laut den *Empfehlungen der Taskforce „Klimabezogene Finanzinformationen" (TCFD), 2017*) politik- und rechtsbasiert (z. B. verstärkte Verpflichtung zur Emissionsberichterstattung), technologiebasiert (z. B. Kosten für den Übergang zu emissionsärmeren Technologien), marktbasiert (z. B. höhere Rohstoffkosten) und reputationsbasiert (z. B. verstärktes Anliegen der Interessengruppen) sein.

166. Klimabedingte Risiken, die sich bei Bruttobetrachtung ergeben, beziehen sich auf physische Bruttorisiken und Bruttoübergangsrisiken, die infolge der Exposition der Vermögenswerte und Geschäftstätigkeiten des Unternehmens gegenüber klimabedingten Gefahren auftreten können.

1.7. Leitlinien zum Zusatzmodul – Sozialkennzahlen

C5 – Zusätzliche (allgemeine) Merkmale der Arbeitskräfte

167. Das zahlenmäßige Verhältnis von Frauen zu Männern wird ermittelt, indem die Anzahl der weiblichen ***Beschäftigten*** durch die Anzahl der männlichen Beschäftigten auf Führungsebene geteilt wird. Daraus ergibt sich der Frauenanteil im Vergleich zum Männeranteil im Unternehmen.

$$Verhältnis\ \text{Männer/Frauen} = \frac{Anzahl\ der\ Frauen\ in\ Führungspositionen}{Anzahl\ der\ Männer\ in\ Führungspositionen}$$

168. Die Führungsebene gilt als Ebene unterhalb des Leitungs-/Kontrollorgans, sofern das Unternehmen keine eigene Definition anwendet.

169. Beispielsweise würde bei 28 weiblichen und 84 männlichen ***Beschäftigten*** auf Führungsebene das Frauen/Männer-Verhältnis 1:3 betragen, was bedeutet, dass einer Frau auf Führungsebene drei Männer gegenüberstehen.

170. Bei der Entscheidung des Unternehmens, ob es die Anzahl der Selbstständigen und Zeitarbeitskräfte nach Nummer 60 angibt, sind folgende Faktoren maßgeblich: 1) das zahlenmäßige Verhältnis von ***Beschäftigten*** zu Selbstständigen/Zeitarbeitskräften, insbesondere im Falle einer erheblichen und/oder zunehmenden Abhängigkeit von letzteren, oder 2) ob Selbstständige/Zeitarbeitskräfte im Vergleich zu eigenen Beschäftigten des Unternehmens einem größeren Risiko negativer sozialer ***Auswirkungen*** unterliegen.

171. Die folgende Tabelle zeigt, wie Informationen über Selbstständige, die ausschließlich für das Unternehmen tätig sind und kein eigenes Personal haben, und über Zeitarbeitskräfte, die von Unternehmen bereitgestellt werden, die in erster Linie im Bereich der Vermittlung und Überlassung von Arbeitskräften tätig sind, dargestellt werden können.

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Arten von Arbeitskräften	Zahl der Selbstständigen und Zeitarbeitskräfte
Gesamtzahl der Selbstständigen, die ausschließlich für das Unternehmen tätig sind und kein eigenes Personal haben	
Gesamtzahl der Zeitarbeitskräfte, die von Unternehmen bereitgestellt werden, die in erster Linie im Bereich der Vermittlung und Überlassung von Arbeitskräften tätig sind	

172. Unternehmen können den NACE-Code O78 für Zeitarbeitskräfte heranziehen, die von Unternehmen bereitgestellt werden, die in erster Linie im Bereich der „Vermittlung und Überlassung von Arbeitskräften“ tätig sind.

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C6 – Zusätzliche Informationen über die Arbeitskräfte des Unternehmens – Richtlinien für die Achtung der Menschenrechte und diesbezügliche Prozesse

173. Unternehmen, die über einen Due-Diligence-Prozess im Bereich der Menschenrechte verfügen, können positiv antworten (JA) und könnten den Inhalt der Richtlinien und/oder Prozesse mithilfe des Dropdown-Menüs näher ausführen.

C7 – Schwerwiegende Vorfälle im Zusammenhang mit Menschenrechten

174. Als „bestätigter ***Vorfall***“ gilt eine Klage oder Beschwerde, die im Rahmen eines förmlichen Verfahrens bei dem Unternehmen oder den zuständigen Behörden eingegangen ist, oder ein Fall der Nichteinhaltung, den das Unternehmen im Rahmen etablierter Verfahren festgestellt hat. Etablierte Verfahren zur Feststellung von Nichteinhaltungen können Prüfungen des Managementsystems, formelle Überwachungsprogramme oder ***Beschwerdemechanismen*** umfassen.

1.8. Leitlinien zum Zusatzmodul – Kennzahlen der Unternehmenspolitik

C8 – Umsatzerlöse aus bestimmten Sektoren und Ausnahme von EU-Referenzwerten

175. **Fossile Brennstoffe** im Sinne des Artikels 2 Nummer 62 der Verordnung (EU) 2018/1999 des Europäischen Parlaments und des Rates sind nicht erneuerbare kohlenstoffbasierte Energiequellen wie feste Brennstoffe, Erdgas und Erdöl.

176. Die **Herstellung von Chemikalien** bezieht sich auf die im Anhang Abschnitt C Abteilung 20.2 der Verordnung (EU) 2023/137 aufgeführten Tätigkeiten, d. h. die Herstellung von Schädlingsbekämpfungsmitteln und anderen Pflanzenschutzmitteln.

177. Nach Artikel 12 Absatz 1 der Delegierten Verordnung (EU) 2020/1818 der Kommission sind die folgenden Unternehmen von Paris-abgestimmten EU-Referenzwerten ausgeschlossen:

(a) Unternehmen, die 1 % oder mehr ihrer Umsatzerlöse mit der Exploration, dem Abbau, der Förderung, dem Vertrieb oder der Veredelung von Stein- und Braunkohle erzielen;

(b) Unternehmen, die 10 % oder mehr ihrer Umsatzerlöse mit der Exploration, der Förderung, dem Vertrieb oder der Veredelung von Erdöl erzielen;

(c) Unternehmen, die 50 % oder mehr ihrer Umsatzerlöse mit der Exploration, der Förderung, der Herstellung oder dem Vertrieb von gasförmigen Brennstoffen erzielen; und

(d) Unternehmen, die 50 % oder mehr ihrer Umsatzerlöse mit der Stromerzeugung mit einer THG-Emissionsintensität von mehr als 100 g CO_2eq/kWh erzielen.

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C9 – Geschlechtervielfalt im Leitungsorgan

178. Das ***Leitungsorgan*** ist die höchste Entscheidungsinstanz in einem Unternehmen. Je nach der Rechtsordnung, die für das Unternehmen gilt, und der Klassifizierung seiner Rechtspersönlichkeit kann das Leitungsorgan unterschiedlich gestaltet sein.

179. Auf der Grundlage der Anforderungen der SFDR wird die Geschlechtervielfalt des Leitungsorgans als durchschnittliches zahlenmäßiges Verhältnis der weiblichen zu den männlichen Mitgliedern berechnet.

$$Verhältnis\ Geschlechtervielfalt = \frac{Anzahl\ weiblicher\ Mitglieder}{Anzahl\ männlicher\ Mitglieder}$$

Beispiel

180. Das Leitungsorgan eines bestimmten KMU setzt sich aus sechs Mitgliedern zusammen, darunter drei Frauen. Die Geschlechtervielfalt ist eins – für jedes weibliche Mitglied gibt es ein männliches Mitglied.

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Digitales Template VSME

Version:	1.1.1
Veröffentlichungsdatum:	27.11.2025

EFRAG sustainability reporting

Taxonomie-Zugangspunkt (entry point)	https://xbrl.efrag.org/taxonomy/vsme/2025-07-30/vsme-all.xsd
Sprachauswahl:	German - Reviewed translation by German Standard Setter [de]
Überschrift des Berichts	Nachhaltigkeitsbericht
Untertitel des Berichts	Erstellt gemäß dem Standard für die freiwillige Nachhaltigkeitsberichterstattung

Digitale VSME-Vorlage

Der Zweck dieser digitalen Vorlage besteht darin, zu veranschaulichen, wie die VSME-Berichterstattung in einer digitalen Vorlage implementiert werden kann. Die Vo
Taxonomie begleitet, die das digitale Datenmodell zu den Angaben darstellt und auf der Website von EFRAG verfügbar ist. Der VSME verlangt die Angabe von Vergle
im ersten Berichtsjahr verwendet werden. Es wird erwartet, dass Berichterstattungslösungen die Fortschreibung von Berichtszeiträumen ermöglichen, was automatisch
Diese VSME-Vorlage kann für die Dateneingabe und Validierung verwendet werden. Durch die Nutzung eines XBRL-Konverters auf der Website von EFRAG kann sie al
Wertzellen, die leer sind und keinen Wert enthalten (weder Text noch Zahl), werden bei der Verwendung des Excel-zu-XBRL-Konverters als nicht berichtet betrachtet u
Einige Dropdown-Auswahlmenüs in der digitalen VSME-Vorlage enthalten mehr als 100 Einträge (z. B. die NACE-Codes unter B1, die Liste der Schadstoffe unter B4, die
Wenn eine Sicherheitswarnung angezeigt wird, klicken Sie bitte auf "Inhalt aktivieren", um die automatische Berechnung der GPS-Koordinaten für die Liste der Standor
Nutzungsrichtlinie von Nominatim (Geocoding-Richtlinie) und der Datenschutzrichtlinie einsehbar.
Alle vom EFRAG-Sekretariat entwickelten Materialien werden kostenlos und als Open Source (MIT-Lizenz) bereitgestellt, was es Interessenträgern ermöglicht, diese wei
im entsprechenden Excel-Arbeitsblatt eingesehen werden.
Wenn Sie ein Problem mit der digitalen VSME-Vorlage oder dem "Digital Template to XBRL Converter" melden möchten, tun Sie dies bitte, indem Sie ein "Issue" im GitH

Anleitung:

0. Geben Sie die Informationen an, die für die Erstellung des VSME- und XBRL-Berichts verpflichtend anzugeben sind.
1. Tragen Sie die Angaben in den vier Excel-Arbeitsblättern (General Information, Environmental Disclosures, Social Disclosures, Governance Disclosures) in die weißen, schwarz umrandeten Zell
werden in mehreren Zellen angezeigt, sobald die entsprechende Zelle ausgewählt wird.
2. Weitere Informationen zu den tatsächlichen Angabepflichten finden sich im VSME-Standard sowie über die in den Zellen verlinkten Leitlinien. Zusätzliche oder unternehmensspezifische Angat
3. Für offene Tabellen wie die Liste der Tochterunternehmen/Standorte bitte die Gruppen durch Klicken auf das Pluszeichen [+] links erweitern. Falls weitere Zeilen benötigt werden, können dies
4. Eingegebene Daten können über den Validierungsstatus überprüft werden. Wenn die Validierung fehlschlägt, gilt der Bericht als unvollständig oder fehlerhaft. Dies kann zu einem ungültigen
5. Konvertieren Sie diese VSME-Vorlage mit dem Online-Konverter in einen Inline-XBRL-Bericht (oder XBRL-JSON, XBRL-CSV). Achten Sie auf die vom Validator durchgeführte XBRL-Validierung.
6. Das Unternehmen kann den Bericht auch in öffentlichen Archiven oder auf einer Webseite hochladen.

Die Hintergrundfarben der Zellen haben folgende Bedeutungen:

Allgemeine Grundsätze	Bed… s die Angabe sich auf die allgemeinen Grundsätze des VSME bez
Basismodul	… die Angabe aus dem VSME-Basismodul stammt.
Zusatzmodul	…e Angabe aus dem VSME-Zusatzmodul stammt.

NUR DIGITAL

„Digitales Template VSME“
Benutzerfreundliche Datenerfassung der Datenpunkte des VSME in einem digitalen Excel-Template (Version 1.1.1. vom 27.11.2025) (Excel-Tabelle mit interaktiven Kontrollkästchen)

https://www.efrag.org/en/vsme-digital-template-and-xbrl-taxonomy

Digitales Template VSME

Version:	1.1.1
Veröffentlichungsdatum:	27.11.2025
Taxonomie-Zugangspunkt (entry point)	https://xbrl.efrag.org/taxonomy/vsme/2025-07-30/vsme-all.xsd
Sprachauswahl:	German - Reviewed translation by German Standard Setter [de]
Überschrift des Berichts	Nachhaltigkeitsbericht
Untertitel des Berichts	Erstellt gemäß dem Standard für die freiwillige Nachhaltigkeitsberichterstattung kleiner und mittlerer Unternehmen (VSME), veröffentlicht durch die Europäische Kommission am 30. Juli 2025.

Digitale VSME-Vorlage

Der Zweck dieser digitalen Vorlage besteht darin, zu veranschaulichen, wie die VSME-Berichterstattung in einer digitalen Vorlage implementiert werden kann. Die Vorlage spiegelt die am 30. Juli 2025 von der Europäischen Kommission veröffentlichte VSME-Empfehlung wider. Die Vorlage wird von einer digitalen VSME-XBRL-Taxonomie begleitet, die das digitale Datenmodell zu den Angaben darstellt und auf der Website von EFRAG verfügbar ist. Der VSME verlangt die Angabe von Vergleichsinformationen zu Kennzahlen (Absatz 12). Diese VSME-Vorlage ermöglicht die Berichterstattung für nur einen Berichtszeitraum, daher kann sie möglicherweise nur im ersten Berichtsjahr verwendet werden. Es wird erwartet, dass Berichterstattungslösungen die Fortschreibung von Berichtszeiträumen ermöglichen, was automatisch die notwendigen Vergleichsinformationen bereitstellen würde.
Diese VSME-Vorlage kann für die Dateneingabe und Validierung verwendet werden. Durch die Nutzung eines XBRL-Konverters auf der Website von EFRAG kann sie als XBRL-Bericht in einem freien und offenen Datenformat gespeichert werden. Excel-benannte Bereiche werden verwendet, um die Angaben zu extrahieren.
Wertzellen, die leer sind und keinen Wert enthalten (weder Text noch Zahl), werden bei der Verwendung des Excel-zu-XBRL-Konverters als nicht berichtet betrachtet und nicht in den XBRL-Bericht aufgenommen.
Einige Dropdown-Auswahlmenüs in der digitalen VSME-Vorlage enthalten mehr als 100 Einträge (z. B. die NACE-Codes unter B1, die Liste der Schadstoffe unter B4, die Liste der Abfälle unter B7). Um in der Liste zu suchen, können Nutzer einfach Suchbegriffe in die Zelle eingeben.
Wenn eine Sicherheitswarnung angezeigt wird, klicken Sie bitte auf "Inhalt aktivieren", um die automatische Berechnung der GPS-Koordinaten für die Liste der Standorte unter B1 zu ermöglichen. Es werden keine anderen Inhalte als die eingegebene Adresse ins Internet gesendet, und der mit dem Anbieter geteilte Inhalt ist in der Nutzungsrichtlinie von Nominatim (Geocoding-Richtlinie) und der Datenschutzrichtlinie einsehbar.
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Wenn Sie ein Problem mit der digitalen VSME-Vorlage oder dem "Digital Template to XBRL Converter" melden möchten, tun Sie dies bitte, indem Sie ein "Issue" im GitHub-Projekt erstellen.

Anleitung:
0. Geben Sie die Informationen an, die für die Erstellung des VSME- und XBRL-Berichts verpflichtend anzugeben sind.

1. Tragen Sie die Angaben in den vier Excel-Arbeitsblättern (General Information, Environmental Disclosures, Social Disclosures, Governance Disclosures) in die weißen, schwarz umrandeten Zellen ein. Tragen Sie keine Informationen außerhalb dieser Zellen ein. Die Suche in Dropdown-Listen kann durch Eingabe eines Suchbegriffs in die Zelle erfolgen. Hinweise zur Eingabe werden in mehreren Zellen angezeigt, sobald die entsprechende Zelle ausgewählt wird.

2. Weitere Informationen zu den tatsächlichen Angabepflichten finden sich im VSME-Standard sowie über die in den Zellen verlinkten Leitlinien. Zusätzliche oder unternehmensspezifische Angaben können in einem Textfeld am Ende jedes Excel-Arbeitsblatts gemacht werden.

3. Für offene Tabellen wie die Liste der Tochterunternehmen/Standorte bitte die Gruppen durch Klicken auf das Pluszeichen [+] links erweitern. Falls weitere Zeilen benötigt werden, können diese zwischen der ersten und letzten Zeile eingefügt werden. Die Zeilen-IDs in offenen Tabellen müssen je Tabelle einzigartig bleiben.

4. Eingegebene Daten können über den Validierungsstatus überprüft werden. Wenn die Validierung fehlschlägt, gilt der Bericht als unvollständig oder fehlerhaft. Dies kann zu einem ungültigen XBRL-Bericht führen.
5. Konvertieren Sie diese VSME-Vorlage mit dem Online-Konverter in einen Inline-XBRL-Bericht (oder XBRL-JSON, XBRL-CSV). Achten Sie auf die vom Validator durchgeführte XBRL-Validierung.
6. Das Unternehmen kann den Bericht auch in öffentlichen Archiven oder auf einer Webseite hochladen.

Die Hintergrundfarben der Zellen haben folgende Bedeutungen:

Allgemeine Grundsätze	Bedeutet, dass die Angabe sich auf die allgemeinen Grundsätze des VSME bezieht.
Basismodul	Bedeutet, dass die Angabe aus dem VSME-Basismodul stammt.
Zusatzmodul	Bedeutet, dass die Angabe aus dem VSME-Zusatzmodul stammt.
	Bedeutet, dass die Zelle automatisch berechnet wird und keine Dateneingabe erforderlich ist.
	Bedeutet, dass der Datenpunkt (oft eine Bedingung) nicht im VSME- und digitalen XBRL-Bericht enthalten sein wird. Diese Zellen dienen zur Erleichterung der Vervollständigung der Angabe, da sie entweder die Bedingungen für die Angabe ("falls zutreffend") auslösen oder die automatische Berechnung der Angabe ermöglichen. Wenn die gelben Zellen nicht zur Berechnung eines Wertes verwendet werden, kann die anzugebende Gesamtsumme durch manuelles Überschreiben der Formel eingegeben werden.
	Bedeutet, dass keine Dateneingabe erforderlich ist, es sei denn, bestimmte Logiken (z.B. "falls zutreffend") werden in der Angabe selbst ausgewählt. Wenn eine dieser Logiken ausgewählt wird, wird diese Zelle weiß.
Validierung FEHLENDER WERT/FEHLER/INKONSISTENTER WERT/UNGÜLTIGE URL	Bedeutet, dass entweder die Dateneingabe im Hinblick auf das Format fehlerhaft ist oder dass bestimmte Informationen fehlen, um die Angabe korrekt zu erfassen.
Validation OK	Bedeutet, dass die Dateneingabe in Ordnung ist und das Unternehmen mit der nächsten Angabe fortfahren kann.
	In diese Zelle kann kein Wert eingegeben werden.
[+]	Listen können mit der Plus [+] Taste links erweitert werden. Wenn die Anzahl der Zeilen nicht ausreicht, können weitere Zeilen hinzugefügt werden, indem man mit der rechten Maustaste auf die zweite Zeile klickt und „Zeile einfügen“ auswählt.

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„VSME XBRL Taxonomiepaket"
Datenmodell zur VSME-Berichterstattung (u.a. XBRL-Format) zur Erleichterung des Datenaustauschs und Datenbankimporte mithilfe eines strukturierten, lizenzfreien und offenen Formates (VSME XBRL Taxonomiepaket vom 27.11.2025)

https://www.efrag.org/en/vsme-digital-template-and-xbrl-taxonomy

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#RV0551

8 „VSME XBRL Taxonomiepaket" Datenmodell zur VSME-Berichterstattung (u.a. XBRL-Format) zur Erleichterung des Datenaustauschs und Datenbankimporte mithilfe eines strukturierten, lizenzfreien und offenen Formates (VSME XBRL Taxonomiepaket vom 27.11.2025)



THE CONTENT OF THIS SUPPORTING GUIDE IS PREPARED FOR UNDERTAKINGS WITH FEWER THAN 250 EMPLOYEES

Disclaimer

The European Commission in the Omnibus proposal released on 26 February 2025

NUR DIGITAL

„VSME-Unterstützungsleitfaden zu C2 – Maßnahmen, Strategien“
VSME Supporting Guide on Dislosure C2 – Comprehensive Module (Practices, Policies, and Future Initiatives)
vom 11.12.2025

https://www.efrag.org/en/vsme-supporting-guide-on-disclosure-c2-comprehensive-module-practices-policies-and-future

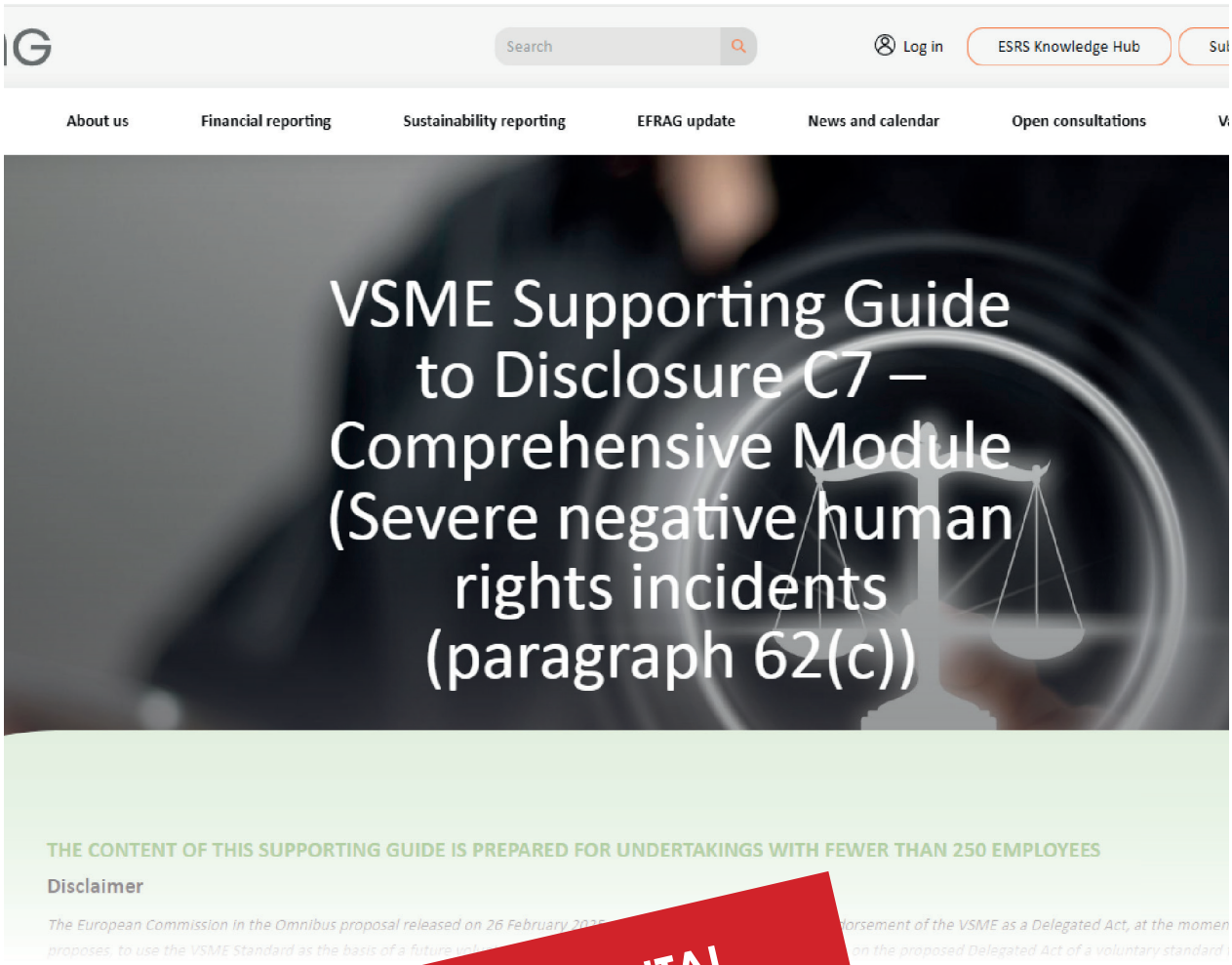


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„VSME-Unterstützungsleitfaden zu C3 – THG-Reduktionsziele und Klimawende“
VSME Supporting Guide on Dislosure C3 – Comprehensive Module
(GHG reduction targets and climate transition)
vom 11.12.2025

https://www.efrag.org/en/vsme-supporting-guide-on-disclosure-c3-comprehensive-module-ghg-reduction-targets-and-climate

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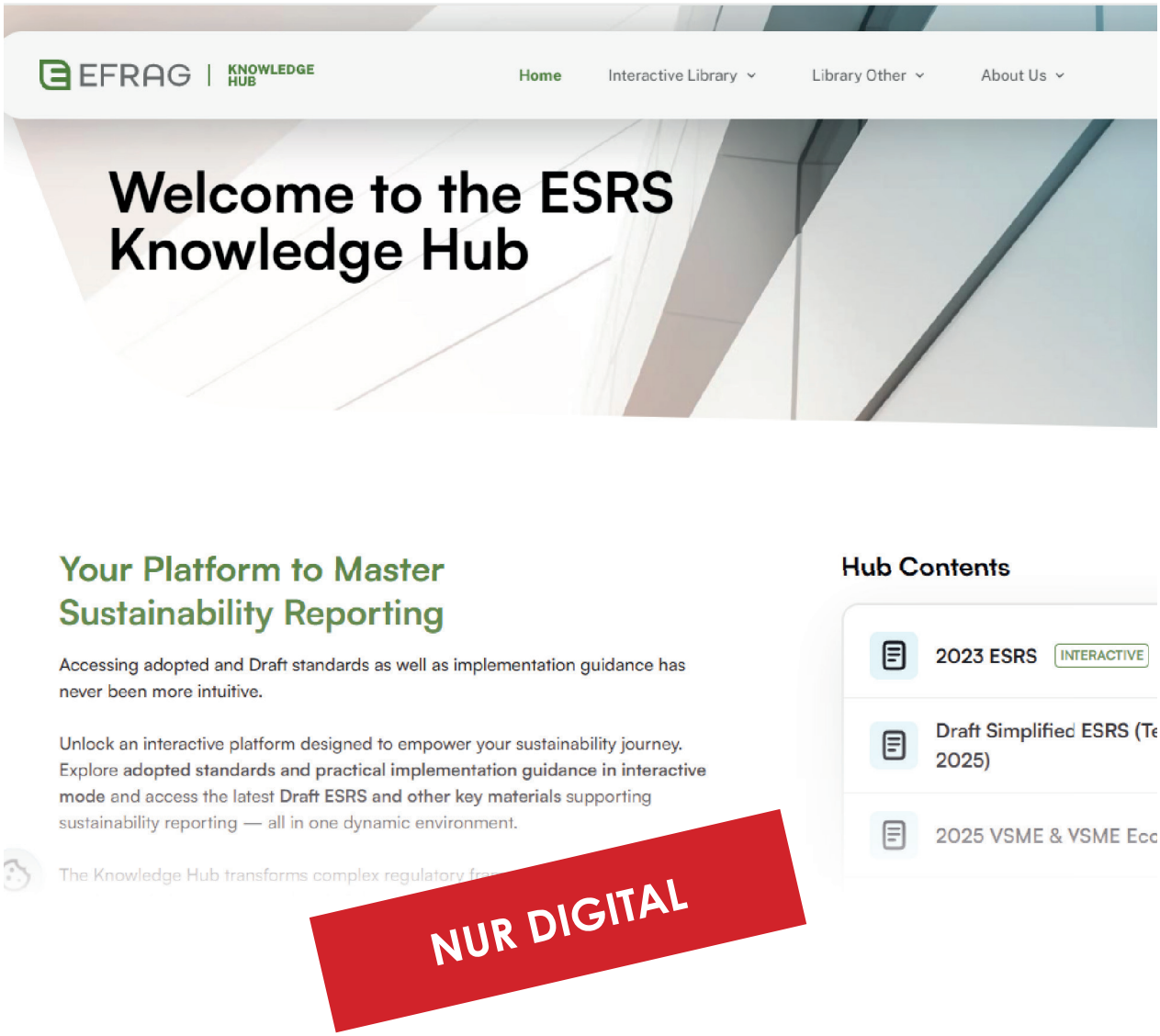


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„VSME-Unterstützungsleitfaden zu C7 – schwere negative Menschenrechtsvorfälle“
VSME Supporting Guide on Dislosure C7 – Comprehensive Module (Severe negative human rights incidents (paragrph 62 c)) vom 11.12.2025

https://www.efrag.org/en/vsme-supporting-guide-to-disclosure-c7-comprehensive-module-severe-negative-human-rights-incidents

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Zentrale interaktive Plattform mit allen angenommenen Standards, praktischen Umsetzungsleitlinien im interaktiven Modus, neueste Entwürfe von Standards und Unterstützungsmaterialien.

https://knowledgehub.efrag.org/eng

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12 „Zentrale interaktive Plattform mit allen angenommenen Standards, praktischen Umsetzungsleitlinien im interaktiven Modus, neueste Entwürfe von Standards und Unterstützungsmaterialien.



„VSME-Market Acceptance“
VSME Market Acceptance – Progress Report vom 16.12.2025

https://www.efrag.org/sites/default/files/media/document/2025-12/VSME%20Market%20Acceptance%20Survey%20Report.pdf

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#RV0557

VSME MARKET ACCEPTANCE

PROGRESS REPORT

Stand: 01.02.2026



EFRAG
sustainability reporting

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This report presents an overview of the market's acceptance of the VSME following the adoption of the European Commission's Recommendation. It summarises information gathered from the respondents that answered to the Market Acceptance Progress Survey conducted by EFRAG. The findings highlight the current level of awareness and adoption of the VSME Standard, along with the key challenges and opportunities that could encourage wider use of the VSME.

VSME has been developed by EFRAG and recommended for use by the European Commission for companies with fewer than 250 employees.

About EFRAG

EFRAG's mission is to serve the European public interest in both financial and sustainability reporting by developing and promoting European views in the field of corporate reporting. EFRAG builds on and contributes to the progress in corporate reporting. In its sustainability reporting activities, EFRAG provides technical advice to the European Commission in the form of draft European Sustainability Reporting Standards (ESRS) elaborated under a robust due process and supports the effective implementation of ESRS. EFRAG seeks input from all stakeholders and obtains evidence about specific European circumstances throughout the standard setting process. Its legitimacy is built on excellence, transparency, governance, due process, public accountability and thought leadership. This enables EFRAG to speak convincingly, clearly, and consistently, and be recognised as the European voice in corporate reporting and a contributor to global progress in corporate reporting.

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Executive Summary

1. The report on VSME Market Acceptance provides a snapshot of the level of acceptance and awareness of the VSME at this moment in time. An overall conclusion can be made that both the awareness and the acceptance of the VSME have been increasing since its publication in December 2024 while further efforts in that respect are warranted. EFRAG acknowledges that it may still be early to fully assess its uptake, particularly in light of the ongoing political negotiations on the Omnibus proposal[1]. For this reason, this survey serves as an initial step to measure the current VSME market acceptance for companies below 250 employees and establishes a baseline for tracking how the acceptance may progress in the future.
2. One limitation in analysing the responses is that the survey was launched in October 2025 when EFRAG's work on the VSME supporting guides was still ongoing. In addition, the EFRAG VSME Digital template updates as well as the mapping of digital tools had just been published on the EFRAG website.
3. Based on the 282 responses received, the overall awareness of the VSME is positive, supported by Annex I and Annex II translations which were deemed useful for understanding the VSME and fostering awareness across the EU. In addition, many respondents have been following EFRAG's drafting process since November 2022.
4. Regarding application and use, most preparers, users and other stakeholders have fully or partially applied information from the VSME. Some of the remaining respondents plan to apply or use it within the next 12 months. Preparers are using both the Basic and Comprehensive Modules, spending between one and three weeks on report preparation. On the users' side, most are already using the VSME as a guiding framework to collect information.
5. Awareness and use have not significantly increased since the EC Recommendation, largely due to regulatory uncertainty linked to the Omnibus proposal. In fact, even if this survey refers to the use of VSME by undertaking with less than 250 employees, interest was also shown by other stakeholder categories excluded from the CSRD scope according to Omnibus. It is expected that this interest will increase following the political agreement of the European co-legislators on the CSRD amendments of 8/9 December, which includes the mandate to the Commission for adopting a delegated act based on the VSME.
6. In terms of use of the VSME framework to gather information from SMEs' business counterparts, the majority of users reported that they have already started using the VSME as a guiding framework.
7. Some respondents also noted that users tend to require additional information not covered in VSME, particularly from banks and large undertakings. The most recurring requests are due diligence assessment and information on supply chain, Scope 3, product carbon footprint, business conduct (training on anti-corruption) and information necessary for alignment with EU Taxonomy.

[1] The Omnibus proposal envisages the adoption as Delegated Act of a voluntary standard for companies other than SMEs that will be excluded by the revised scope of the CSRD, based on VSME.

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8. The main challenges in applying the VSME include lack of training and awareness, limited availability of tools, unclear methodologies for quantifying disclosures and collecting data, difficulty of integrating VSME information into their internal processes, absence of a centralised digital repository and challenge of aligning banks and risk-related requirements with VSME disclosures. The Commission and Member States are invited to take those observations as a signal to what extent and in which areas further and/ or continued activities may effectively address the challenges.
9. The main perceived benefits are improved access to finance, satisfaction of large undertakings' needs, better resource utilisation, cost optimisation, and internal and external strategic advantages.
10. Regarding EFRAG's supporting materials, awareness of the VSME Digital Template and the GHG Calculator list on EFRAG website (based on the mapping of digital tools of September 2025) is relatively low at the moment. In particular, some respondents mentioned that they currently use the VSME Digital Template, while the majority of respondents declared that they use different templates instead. This could be explained by the fact the survey was launched in proximity to the publication and subsequent updates of this material. Nevertheless, educational material in the form of interactive webinars and step-by-step tutorials are slightly better known.
11. Respondents expressed a need for more step-by-step materials with examples to help SMEs interpret reporting expectations, including best practices. In particular, respondents expressed a need for additional case studies on specific disclosures (B3, B5, B7, C3, C4, B6), for sector-specific guidance and additional guidance on specific disclosures (B3, C3, C2, B5, C4, B7), which were identified as the most complex and most frequently asked by business counterparts. To note that EFRAG recently published the Supporting Guides on C2, C3 and C7, hence the expectation is that they will help supporting the implementation of those disclosures that emerged as particularly challenging.
12. Concerning the disclosure B3, the list of GHG calculators published on EFRAG website as result of the mapping of digital tools, should help making the calculation less challenging. The same applies for B5 and B6, for which it is expected that in the next iteration of the EFRAG mapping of digital tools, the geolocation tools, for biodiversity sensitive areas and areas of high-water stress will emerge.
13. Finally, suggestions to boost VSME market acceptance include increasing awareness through examples of published VSME reports, sector-specific guidance, training sessions and best-practice cases; aligning users' requirements and other frameworks with the VSME; offering free and accessible tools; and introducing a certification mechanism.
14. In light of these needs, the EFRAG Secretariat will carefully consider the development of additional guidance (including sectors) and practical case studies to support the effective application and use of the VSME. Moreover, the mapping exercise on digital tools and sustainability reporting initiatives as well as the VSME Digital Template will be continued next year. Lastly, in 2026, EFRAG will run its second edition of the VSME market acceptance survey to monitor progress. In order to stay updated on EFRAG's developments concerning VSME, please visit EFRAG's dedicated webpage and the Knowledge Hub.

INTRODUCTION

15. As part of its ongoing efforts to support the implementation of the Voluntary Sustainability Reporting Standard (VSME) and following the adoption of the European Commission's (EC) Recommendation on the VSME, from 2 October to 24 November 2025 EFRAG launched a Market Acceptance Progress Survey to assess the current level of awareness and use of the VSME among different stakeholders such as financial institutions, investors, business partners, SMEs, National Standard Setter and European and National Associations. The survey also aims to measure the main challenges and benefits perceived by stakeholders when applying the VSME, as well as the extent to which the materials developed by EFRAG to support SMEs (the VSME Digital Template, GHG calculators identified on EFRAG's website after the publication of the mapping of digital tools, interactive webinars, step-by-step tutorials and video explainers) are used to facilitate the adoption of the VSME.
16. Please note that the VSME has been developed by EFRAG and recommended for use by the European Commission for companies with fewer than 250 employees.
17. This initiative forms part of the deliverable of the VSME Ecosystem: 'Survey on VSME acceptance progress', which EFRAG is currently developing to encourage the uptake and consistent application of the VSME across the EU market.
18. Overall, as outlined in the VSME Basis for Conclusion, the VSME, being a voluntary standard, strongly relies on market acceptance, which is the primary rationale for conducting this survey aimed at gathering initial evidence on how it is being perceived and used. The survey was launched after the adoption of the VSME as an EC Recommendation in July 2025, which formally addresses SMEs, Member States and financial institutions. EFRAG acknowledges that it may still be early to fully assess its uptake, particularly in light of the ongoing political negotiations on the Omnibus proposal[2]. For this reason, this survey serves as an initial step to measure the current VSME market acceptance for companies below 250 employees and establishes a baseline for tracking how the acceptance may progress in the future.
19. The objective of this report is to present the findings gathered through the survey process. By mapping the market acceptance progress on the VSME, the report could serve as a foundation for future work, in case EFRAG receives the funding to continue the VSME Ecosystem.

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[2] The Omnibus proposal envisages the adoption as Delegated Act of a voluntary standard for companies other than SMEs that will be excluded by the revised scope of the CSRD, based on VSME.

CHAPTER 1: ANALYSIS OF SURVEY RESPONSES - GENERAL AWARENESS AND ADOPTION OF THE VSME

20. This chapter outlines the main insights from the responses gathered through EFRAG's questionnaire on 'VSME Market Acceptance'. It provides a descriptive overview of the responses, focusing, when relevant, on the categories of the respondents. The analysis serves as a foundation for understanding the current level of awareness and adoption of the VSME among different stakeholders across the EU.

Survey on VSME Market Acceptance

21. An online survey on the progress of VSME market acceptance was launched on 2 October 2025 and ended on 24 November 2025.
22. This online survey, published on EFRAG's website, consisted of three parts.
    (a) **Part A – Respondent information**: collects respondent information, including personal details, stakeholder category, country and sector.
    (b) **Part B – General awareness and adoption**: assesses general awareness, adoption, challenges and benefits from the perspective of all respondent categories related to the VSME and its adoption as an EC Recommendation, as well as training/events planned on the VSME Recommendation and details on the sustainability report format if applied by preparers.
    (c) **Part C – Practical implementation**: explores practical implementation aspects such as the use of the VSME Digital Template, GHG calculators, most complex and easiest disclosures, disclosures most frequently asked by business counterparts and asked on top of the VSME, and the use of EFRAG's supporting materials and additional support needs.

Analysis of responses

23. A total of 282 respondents completed the survey. Taking into account the stakeholder categories that took part in the survey, the composition of the respondent pool can be broken down as follows:
    (a) **preparers**: 41% (SMEs 22%: comprising of 16% Micro undertakings, 36% Small undertakings, 48% Medium undertakings; accountants 10%; European or national associations representing preparers 9%);
    (b) **users**: 20% (large undertakings or corporations 6%; banks or financial institutions 4%; investors or asset managers 3%; public/regional authorities 1%; European or national associations representing users 6%);
    (c) **others**: 39% (regulators or policymakers 4%; civil society or NGOs 3%; academic or research institutions 4%; consultants 28%).

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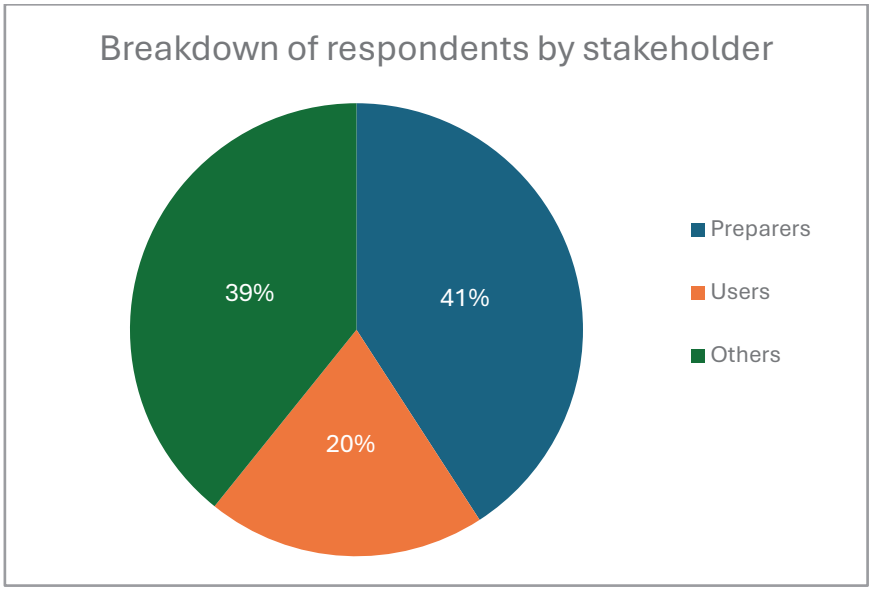


Figure 1: Breakdown of respondents by category

24. Below, more detailed information on each category of respondents:

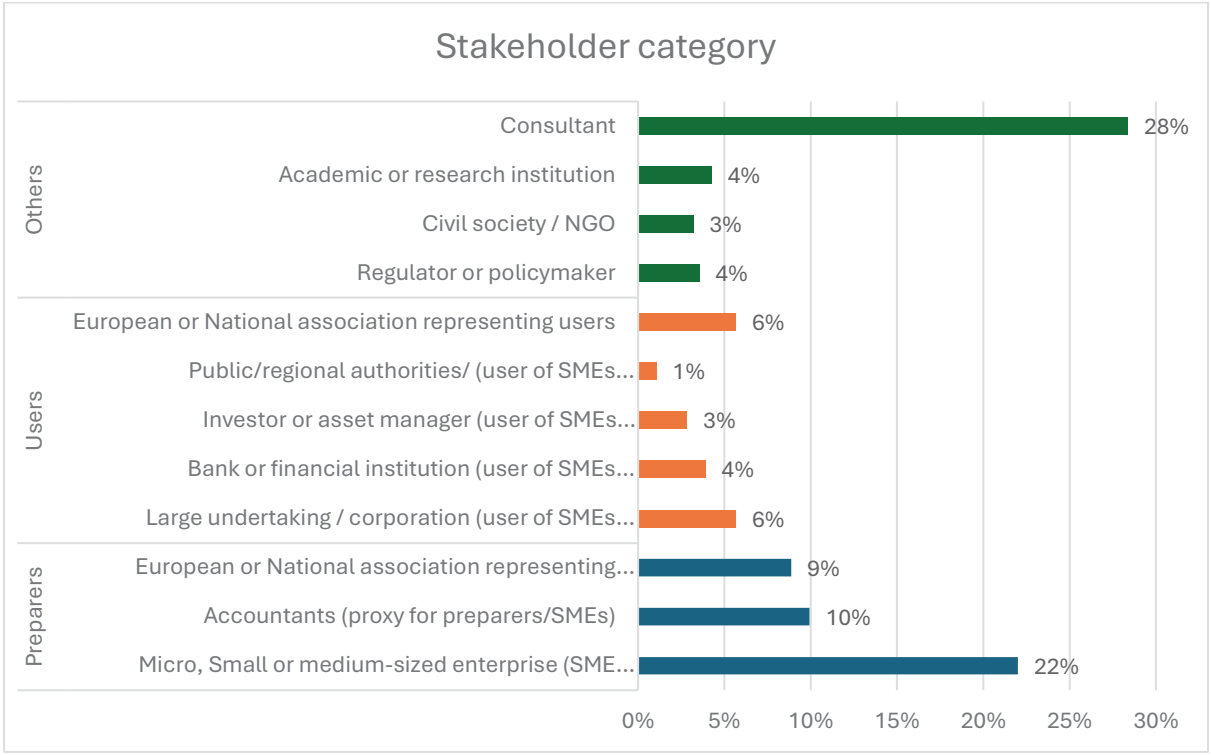


Figure 2: Detailed breakdown of respondents by category

25. To capture the **geographical coverage**, respondents were asked to specify the country where their organisation is based. The analysis revealed that the majority of respondents are based across Europe, in particular in France (12%), Italy (9%), Germany (9%), Norway (6%), the Netherlands (6%), Spain (5%) and Belgium (4%).

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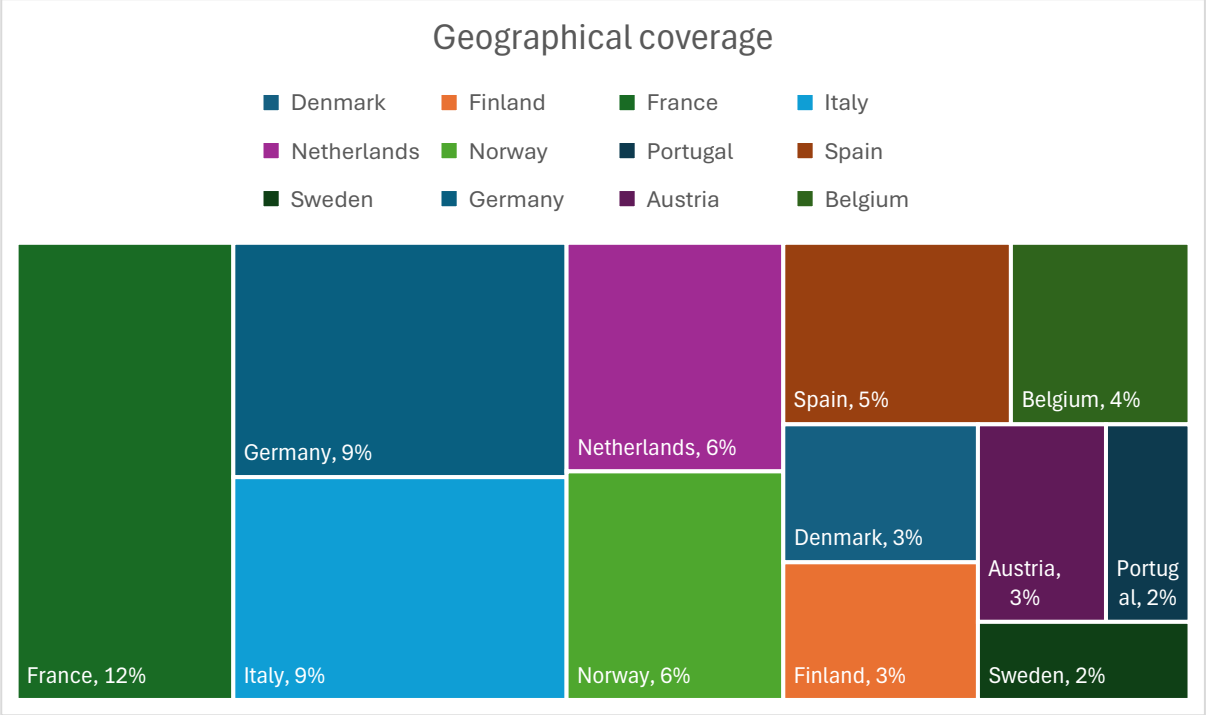


Figure 3: Geographical coverage

26. Among all responses analysed, **sectoral affiliation** was distributed as follows: consulting (20%) was the most common, followed by accounting (11%), business/professional services (9%) and manufacturing (9%). Finance/banking/insurance accounted for 7%, education for 6% and non-profit for 4%. Retail and utilities each represented 3% of the stakeholders. Several additional sectors (e.g. construction, engineering, advertising, etc.) were also mentioned, though they each accounted for 1–2% of respondents. As some participants operate across multiple sectors, the total count of economic sectors affiliation exceeds the number of individual stakeholders.

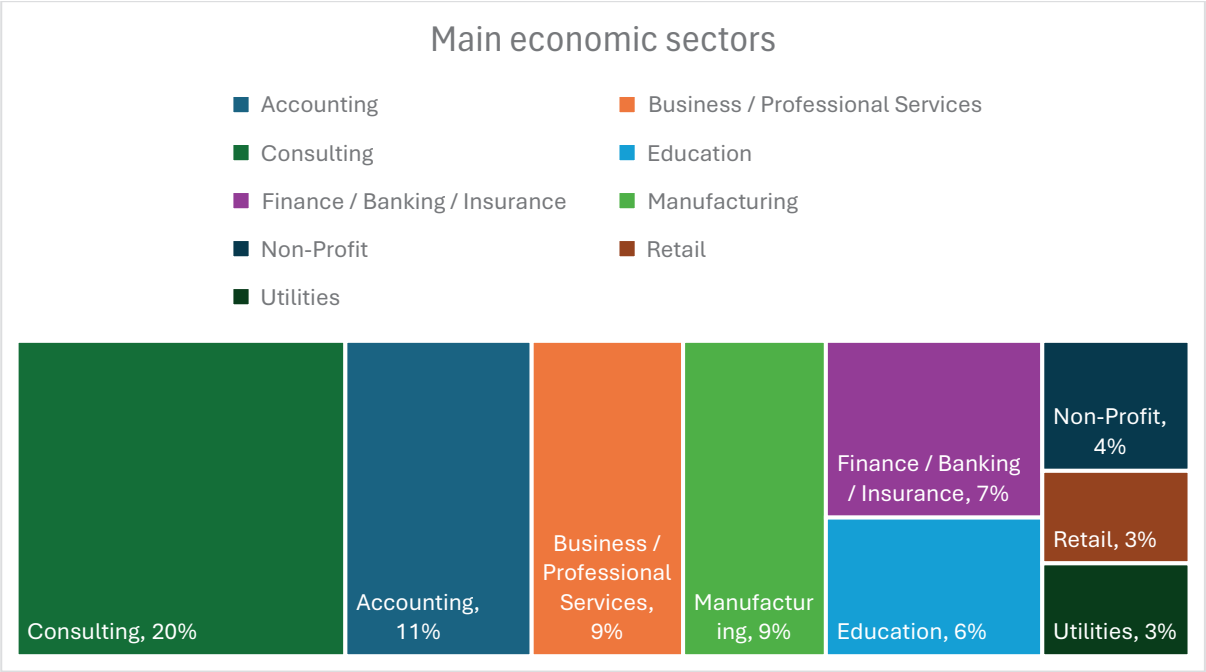


Figure 4: Main economic sectors of the respondents

27. In terms of **awareness of the EC Recommendation on the VSME**, 95% of respondents replied positively.

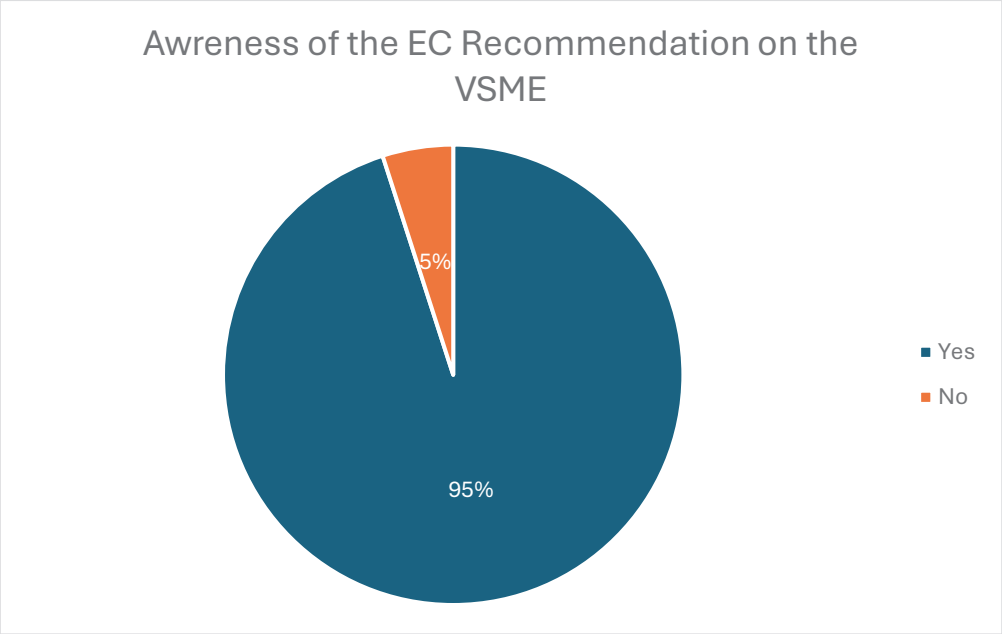


Figure 5: Awareness of the EC Recommendation on the VSME

28. Among respondents aware of the EC Recommendation, 61% have followed EFRAG's entire drafting process since November 2022, while 36% became familiar with the VSME when EFRAG released its technical advice to the EC on 17 December 2024. The remaining 3% were informed of the VSME only after the Recommendation was issued on 30 July 2025.

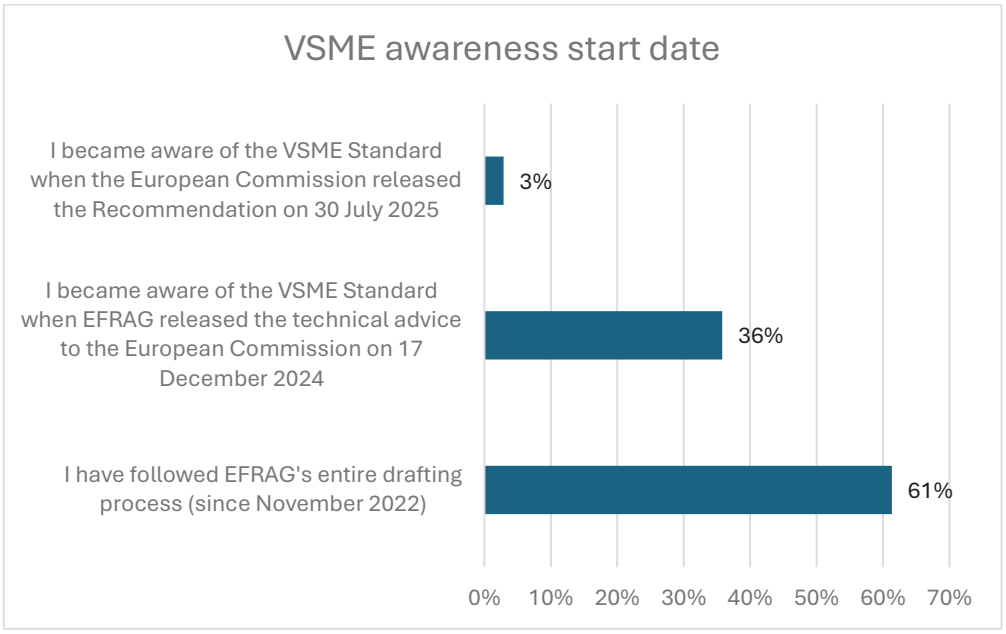


Figure 6: VSME awareness start date

29. Regarding the **translations of the EC Recommendation on the VSME** (Annex I) **and the accompanying guidance** (Annex II) into EU Member States languages, the majority of respondents (81%) reported that these translations were useful for understanding the Standard and fostering awareness across the EU.
30. Across all respondents' groups, translations were viewed as essential for accessibility, helping SMEs understand the requirements, improving clarity and terminology, reducing interpretation risks, and supporting communication and training in national contexts. Preparers particularly stressed their reliance on native-language versions but noted that, even when translated, the text remains difficult to understand and overly bureaucratic. At the same time, respondents indicated that they often reverted to the English version, citing reasons such as its clearer vocabulary, its status as the authoritative reference version, the late availability of translations, or the fact that English is their organisation's working language. Respondents also reported using both versions in parallel to verify wording and ensure consistency. In addition, while translations facilitate the dissemination of the VSME to SMEs and other stakeholders, respondents highlighted the need to translate additional support materials (e.g. supporting guides, training materials, glossaries for technical terms), as they are still facing challenges with its implementation.

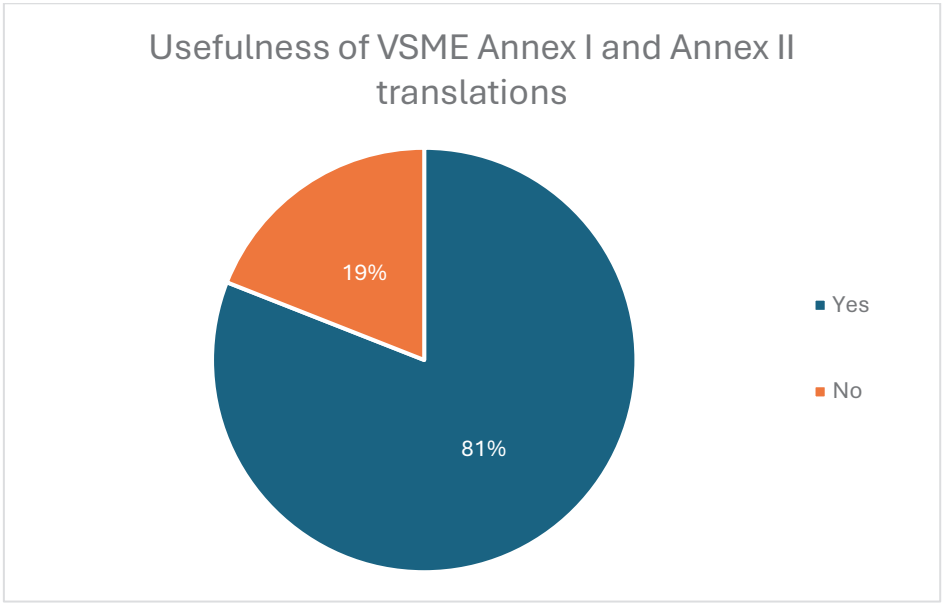


Figure 7: Usefulness of VSME Annex I and Annex II translations

31. The **extent to which stakeholders have applied or used the information provided by the VSME** varies across the three respondent categories (preparers, users, others). Among preparers, the majority has applied the VSME: 43% have fully applied its information and 23% have partially done so. An additional 16% plans to apply it within the next 12 months. Preparers who are not applying the VSME (18%) emphasised that it is still very new and demanding, with many noting insufficient time, knowledge, or financial support to justify the effort. Several also highlighted that their sector or type of organisation does not require sustainability reporting, and that adoption will depend on whether business counterparts, such as banks or clients, recognise and value the VSME.

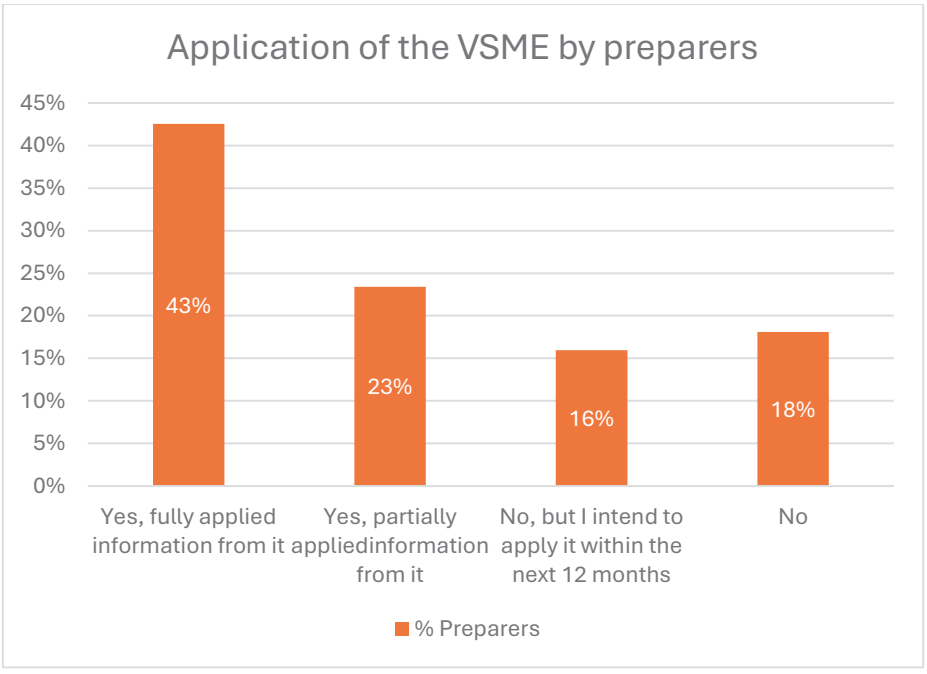


Figure 8: Application of the VSME by preparers

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32. Among users, the level of usage of the information was more mixed: 16% have fully used the information, 36% have partially used it, and 34% have not yet used it but intend to. The 14% of users who are not using the VSME generally see limited need for VSME-based information, as they already collect certain sustainability data through their own systems and prefer proportionate requirements tailored to the company size. Their feedback points to resource constraints among SMEs and difficulties in keeping up with the proliferation of reporting norms.

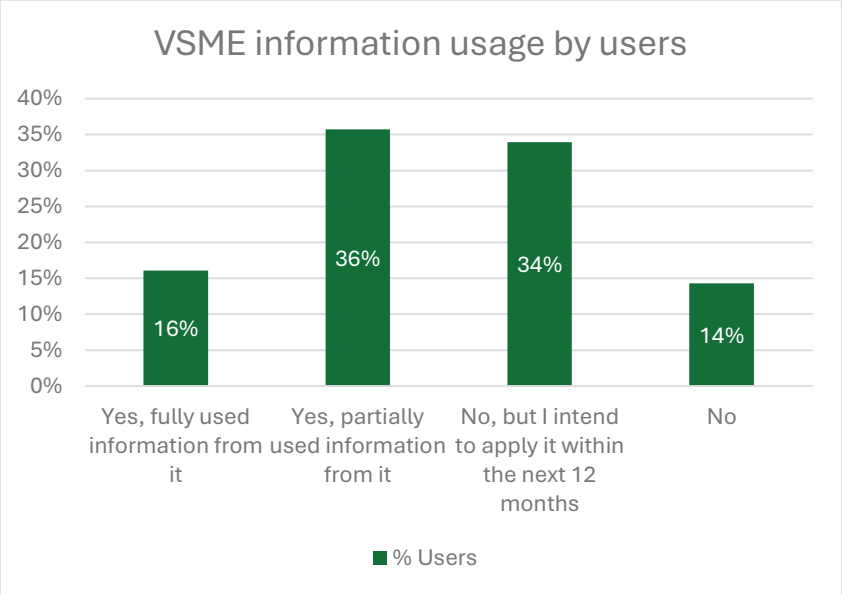


Figure 9: Use of the information from the VSME by users

33. The other stakeholders show a higher uptake, with 40% fully using the information and 34% using it partially. The remaining part are divided between 9% who intend to use in the future and 16% who have not used it. Those in the latter group stress that the VSME is not directly applicable to their own work, though some have integrated it into advisory services. They also underline broader challenges such as administrative burden, regulatory uncertainty and political instability, which further complicate adoption.

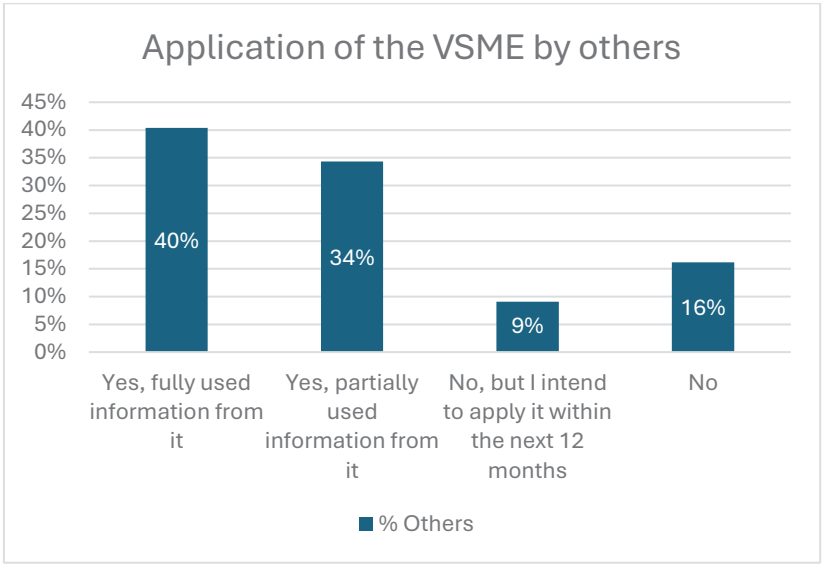


Figure 10: Application/use of the VSME by others

34. Focusing on the preparers, the majority of VSME reports are produced in non-digital formats, with 57% using **PDF or other non-digital formats** and 43% opting for **digital versions**.

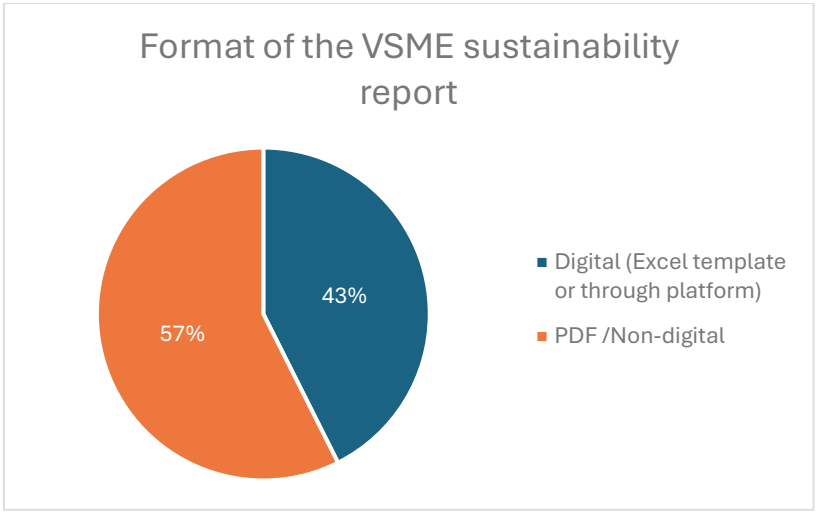


Figure 11: Format of the VSME sustainability report

35. Only a quarter of preparers (26%) have already **published their reports on the companies' website**, while the remaining 74% have not yet done so.

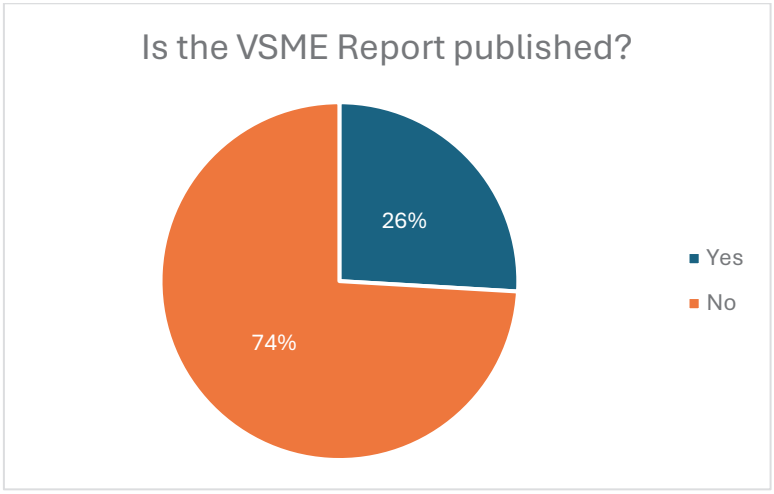


Figure 12: Is the VSME report published?

36. The **time required to prepare the report or gather the data** requested by the VSME varies. For 23% it took less than one week, 49% needed between one and three weeks, and 29% required more than a month.

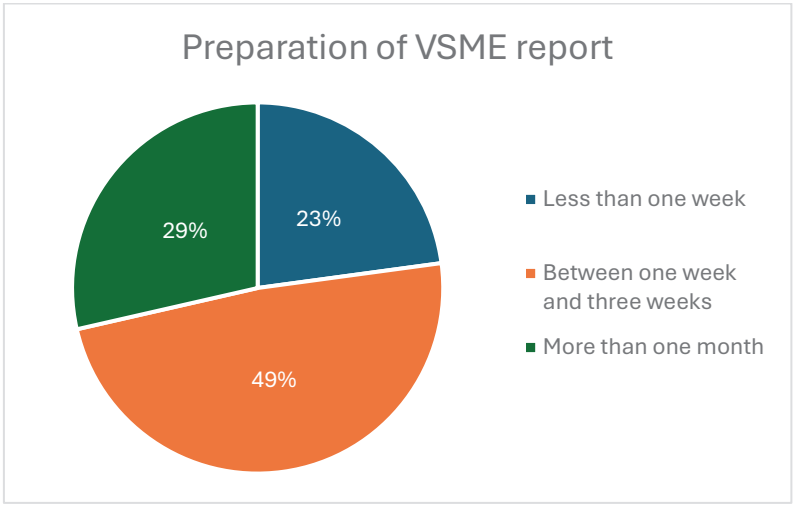


Figure 13: Time needed for the preparation of the VSME report

37. Regarding the **modules applied**, a large majority (67%) selected both the Basic and Comprehensive Modules, 24% relied solely on the Basic Module and 9% combined the Basic Module with only selected disclosures from the Comprehensive Module.

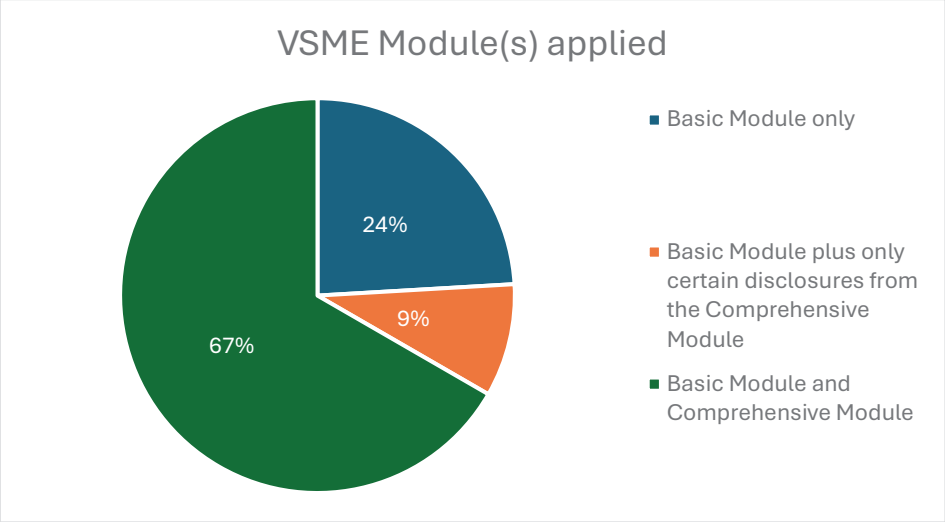


Figure 14: VSME module(s) applied

38. When examining the **main challenges faced by respondents in applying the VSME**, the most frequently cited ones relate to the lack of awareness, lack of training and limited availability of digital tools, although priorities differ by group. Preparers most often selected lack of training (21%) and lack of digital tools (20%), followed by lack of awareness (18%) and complexity of disclosures (16%). Users showed a more dispersed pattern, with other challenges being the most selected (22%), followed by lack of awareness (21%) and resource constraints (17%). The 'others' stakeholders highlighted lack of awareness (23%) as their top challenge, succeeded by lack of digital tools (19%) and lack of training (17%).

    Among the respondents who selected other challenges, there was a consistent reference to:

    (a) difficulties in data collection;
    (b) uncertainty about regulatory expectations;
    (c) limited market awareness of the VSME; and
    (d) the need for clearer guidance and digital tools.

39. In particular, preparers emphasised the practical challenges of:

    (a) reliable data collection;
    (b) unclear methodologies for quantifying datapoints (notably GHG emissions, energy mix or water consumption);
    (c) uncertainty caused by the coexistence of ESRS and the Omnibus proposal; and
    (d) external demand from users for VSME-based reporting still being low, reducing incentives to invest in systems or training.

40. On the other hand, users generally focused on:

    (a) lack of preparedness among SMEs;
    (b) difficulty of integrating VSME information into their internal processes;
    (c) absence of a centralised digital repository to make the information provided by companies more usable; and
    (d) challenge of aligning banks and risk-related requirements with VSME disclosures.

41. 'Others' respondents pointed to:

(a) limited international recognition of the VSME;
(b) uncertainty stemming from the regulatory environment,
(c) the need for clearer datapoint lists;
(d) stronger interoperability with ESRS; and
(e) greater incentives or acceptance across the value chain to ensure meaningful adoption.

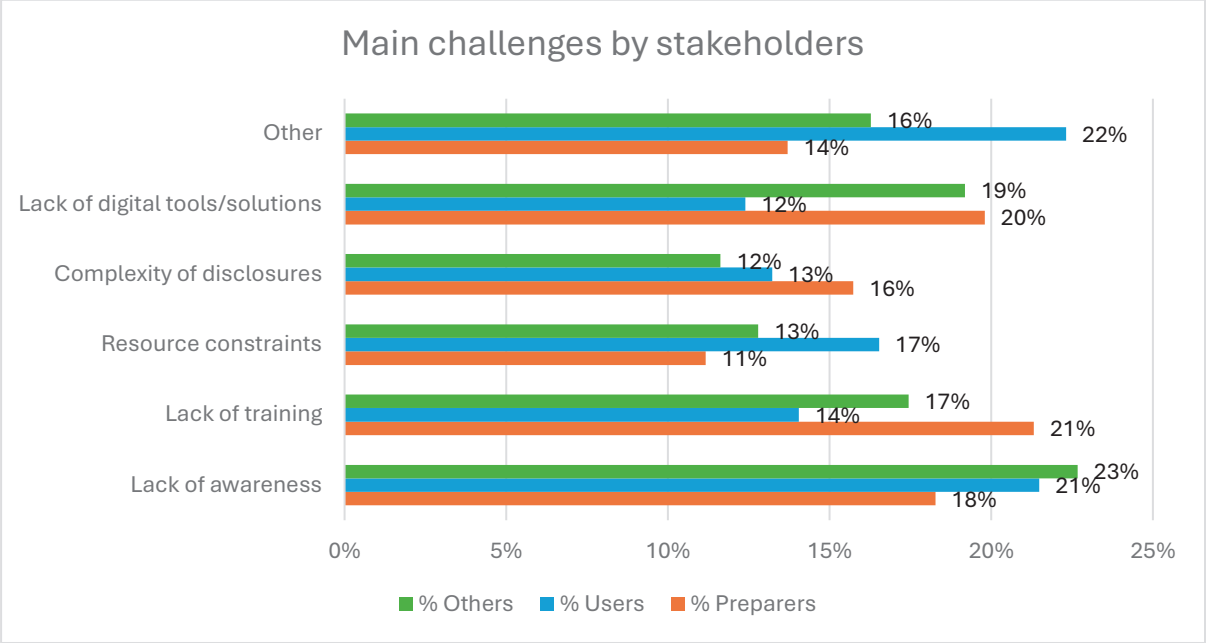


Figure 15: Main challenges in applying the VSME

42. Regarding the **main benefits perceived when applying the VSME**, the most frequently cited benefit across all respondent groups relates to the VSME's ability to provide information that satisfies the data needs of large undertakings. This option was selected by 41% of preparers, 34% of users and 44% of other stakeholders. The second most common benefit is greater access to finance by satisfying the data needs from banks and investors, especially for preparers (25%) and others (27%), and for a smaller part of users (19%). Improvements in the internal management of sustainability issues were acknowledged by both preparers (18%) and others (17%), while users placed greater emphasis on this benefit (26%). Other benefits were mentioned notably among 21% of users and 17% of preparers, and less frequently among other stakeholders (12%).
Among the respondents who selected 'other' benefits, the VSME was further described as useful for improving:
    (a) internal structure;
    (b) comparability; and
    (c) transparency in sustainability information, especially for organisations at an early stage of reporting.
43. Preparers particularly emphasised benefits such as:
    (a) improved resource use awareness;
    (b) cost-optimisation opportunities;
    (c) benchmarking of ESG performance; and

(d) simpler reporting due to the absence of a materiality assessment.

Some also see a strategic benefit in marketing, public tender requirements, or enhanced resilience through climate-risk disclosures.

44. Users' comments reflect a different perspective and report that, when the VSME is used by SMEs, it provides more standardised and comparable ESG information. Several highlighted the potential for the VSME to:
    (a) streamline ESG questionnaires;
    (b) support access to finance.
45. Finally, the 'others' respondents noted benefits related to market alignment and value-chain transparency. Many viewed the VSME as an effective entry point for SMEs beginning sustainability reporting, especially when combined with verification schemes or complementary standards. They also underlined its usefulness for structuring sustainability strategy, preparing for future CSRD-related requirements and enhancing competitiveness in tendering processes.

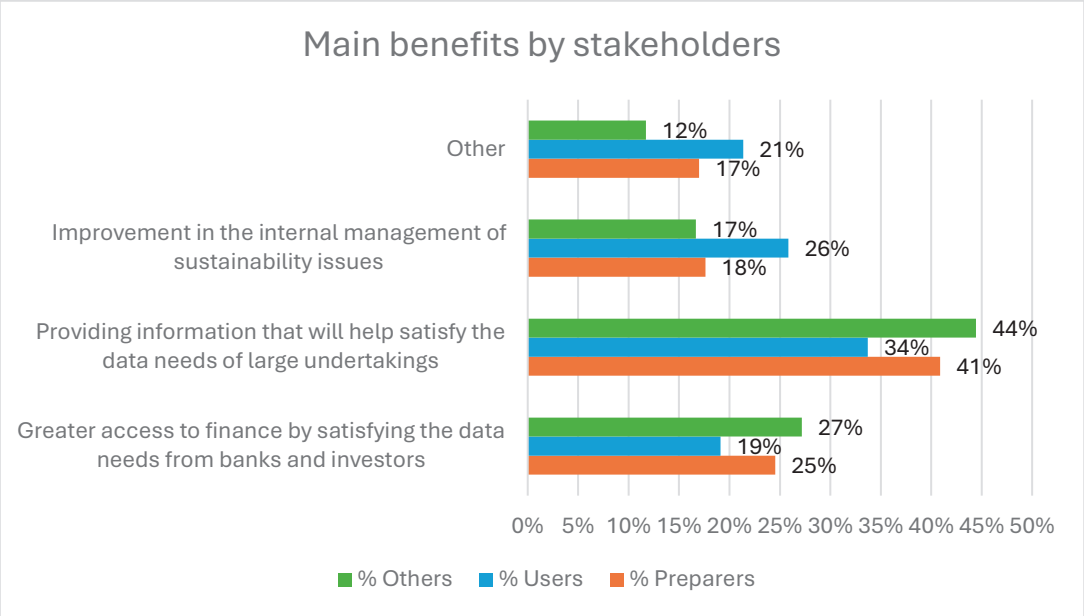


Figure 16: Main benefits in applying the VSME

46. In terms of use of the **VSME framework** to gather information from **SMEs' business counterparts**, 67% of users reported that they have already started using the VSME as a guiding framework. A further 11% indicated that they plan to integrate the VSME into their information-request process, while the remaining 22% stated that they do not plan to use it.
47. In general, comments from some users who do not plan to adopt the VSME framework highlighted the following reasons: (i) the irrelevance to their counterparties' profiles, (ii) the existence of alternative methods for collecting sustainability data, (iii) concerns about the proportionality and adequacy of the framework, and (iv) the ongoing investigation of its suitability. One financial institution noted that it already has established systems for gathering specific information, such as emissions data, and therefore does not need to use the VSME framework. Others emphasised that

their counterparties are not operating in Europe and are consequently not focused on European standards. They also explained that they are not direct users of SME data, though some have supported pilot initiatives to test VSME-based platforms, mainly to ensure feasibility for SMEs. More detailed feedback also points to structural limitations of the VSME for mid-cap undertakings, where the simplified disclosures are seen as insufficient, lacking depth, interoperability with ESRS, and assurance mechanisms, thus reducing their usability for investors and financial institutions. Finally, other users are actively discussing or investigating how the VSME could be implemented, but stress that its current scope and design may not fully meet their needs.

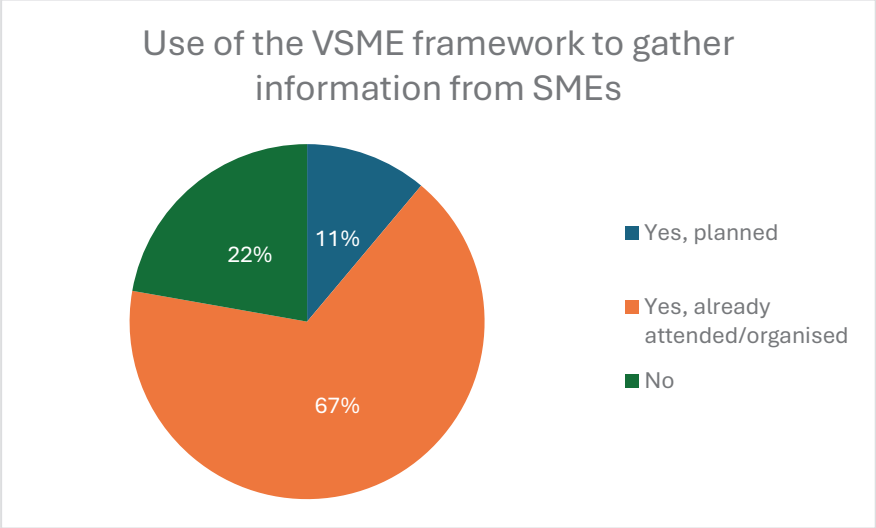


Figure 17: Use of the VSME framework to gather information from SMEs' business counterparts

48. Since the EC Recommendation on the VSME, 55% of respondents have observed an increase in the **use and awareness of the VSME** among their peers and stakeholders, while the remaining 45% have not noted this level of awareness and usage. Notably, the lowest level of awareness is seen among users (52%), while preparers and the others report a higher level of awareness among their peers, 53% and 61% respectively.
49. Across all stakeholder groups, those who reported increased awareness of the VSME generally attribute this to the combined effect of the EC Recommendation, which has given the framework official legitimacy, and the Omnibus process, which has pushed many companies out of the CSRD scope and prompted them to look at the VSME, despite uncertainty on the final text of the future Delegated Act for the voluntary standard dedicated to them. These developments have stimulated a noticeable rise in webinars, trainings, discussions and sector-level initiatives, making the VSME more present in the sustainability reporting landscape. Consultants, advisors, software providers and industry associations are increasingly integrating the VSME into their tools, courses and communication, while banks, investors and some large undertakings are beginning to reference the VSME in their ESG data requests. This has encouraged SMEs to explore the VSME as a simpler, more understandable framework for voluntary reporting. Some specific groups reported particularly strong engagement: preparers emphasised that peers transitioning away from the CSRD now see the VSME as a realistic option; users highlighted early moves by banks and sector

organisations to harmonise their ESG questionnaires around the VSME; and other stakeholders described a rapid spread of awareness within expert communities, where the VSME is increasingly used in teaching, training, and the development of reporting templates. Despite this momentum, respondents across all groups acknowledged that practical implementation still remains behind, with most companies still exploring the VSME and progressing slowly with its concrete adoption.

50. Concerning respondents who did not observe an increase in awareness, the dominant explanation is the persistence of regulatory uncertainty. Companies are hesitant to invest time or resources in learning or applying the VSME while the future CSRD scope, Omnibus outcomes, and potential adjustments to ESRS and the VSME remain unsettled. This uncertainty has, in many cases, slowed sustainability efforts, with some organisations reverting to a wait-and-see approach after earlier attempts to prepare the CSRD. The voluntary nature of the VSME further limits incentives: without legal obligations or consistent market pressure, many SMEs do not see a compelling reason to adopt a new framework. Moreover, respondents consistently point to weak communication and limited visibility, especially at national and regional levels, noting that SMEs outside sustainability-focused networks have not heard of the VSME or do not understand its purpose. Large undertakings often continue using their own questionnaires or ESRS-based templates, meaning that the value-chain pull necessary for widespread adoption has not yet materialised. Looking at the specific categories' responses, preparers observe that stakeholders still rarely request VSME-based information. Users note that banks and customers still seldom reference VSME in practice, while 'others' respondents highlight structural barriers such as low ESG maturity, lack of institutional promotion and reduced trust due to perceived instability in EU sustainability policy.

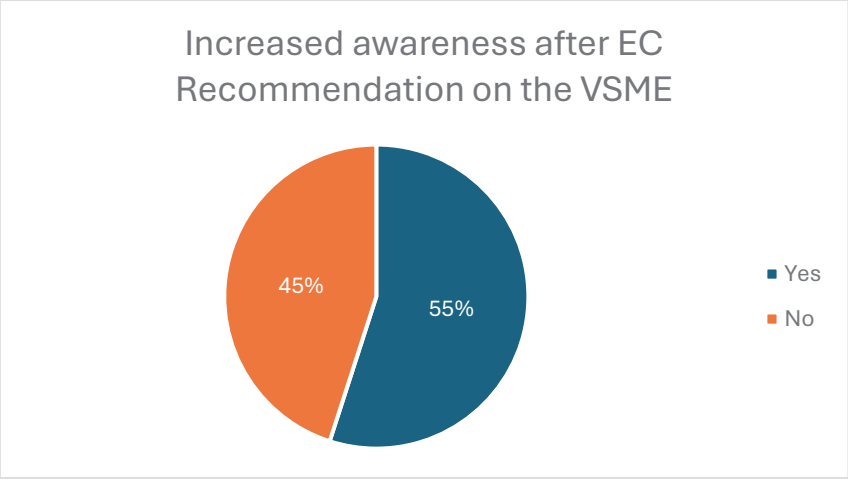


Figure 18: Increased use / awareness of the VSME after EC Recommendation

51. Regarding the preparation of **events and training sessions** on the VSME Recommendation, more than half of respondents (52%) indicated that they have already attended or organised such events. An additional 17% reported that they have events planned and 30% reported neither attending nor planning to attend or organise events.
52. Further explanation from respondents shows that engagement with VSME awareness efforts is already extensive across preparers, users and other stakeholders. Most respondents report having participated in or delivered a wide variety of initiatives, including webinars often organised by

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EFRAG, workshops, industry conferences, internal briefings, training programmes / certification courses, and sector-specific meetings, national associations, consultants, or chambers of commerce. These activities range from introductory sessions to more practical courses aimed at guiding participants through the VSME's structure, methodology, digital platform and reporting steps.

53. Across categories, respondents generally found these sessions useful for understanding reporting expectations, clarifying methodology, and helping SMEs navigate the transition from ESRS or begin reporting on sustainability topics. However, some remarked that certain events remained too high-level, repetitive, or affected by uncertainty around regulatory developments. Specifically, preparers tend to value peer-learning formats, practical demonstrations and early testing of the Standard, while users appreciate the support in how to launch an ESG approach for SMEs, discussions of market expectations from banks and clients, and Q&A exchanges that reveal shared challenges. At last, other stakeholders, many of whom are trainers, highlight strong professional interest but noted continued hesitation among smaller SMEs with limited resources, calling for more concrete examples and operational guidance.
54. Looking ahead, a substantial number of further initiatives are planned across all groups, such as new webinar cycles, stakeholder workshops, internal training programmes, awareness sessions for clients and members, and sector-specific guidance projects, reflecting a shared expectation that more detailed and practical support will be required as adoption of the VSME expands.

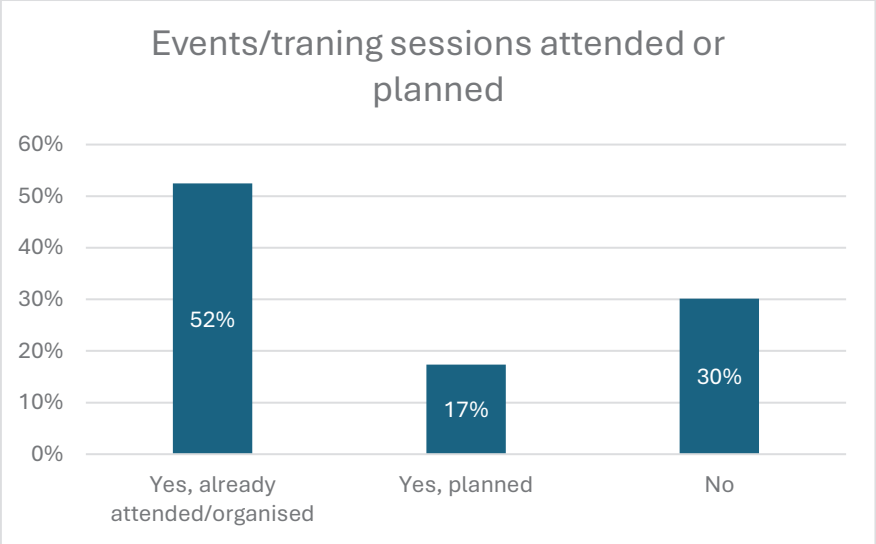


Figure 19: Event / training sessions attended/planned on the VSME Recommendation

CHAPTER 2: PRACTICAL IMPLEMENTATION OF THE VSME

55. This chapter analyses the responses of the VSME Market Acceptance Survey related to the practical implementation of the VSME. It considers the use of supporting material provided by EFRAG (the VSME Digital template, GHG calculators identified on EFRAG's website after the publication of the mapping of Digital tools, interactives webinars, step-by-step tutorials and video explainers), as well as the most complex and easiest disclosure to report on, and the disclosures asked on top of the VSME.
56. Please note that the first release of the VSME Digital Template was published in May 2025, with updates issued in October 2025 following the EC Recommendation as well as on the 27 November 2025 to include additional translations; therefore, the interpretation of the survey answers at this stage may be premature.
57. Regarding the use of the VSME Digital Template, 45% of respondents reported using it, with 24% considering it somewhat useful and 21% very useful. However, the majority of respondents (49%) declared that they use different templates instead. Only a small share (6%), including preparers (15%), users (45%) and others (16%), reported not using any templates for VSME reporting.

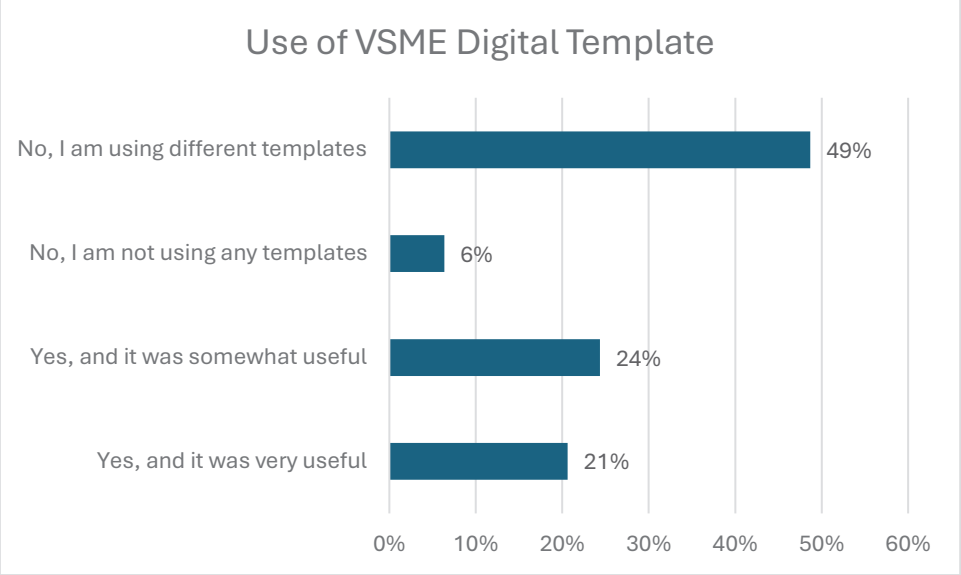


Figure 20: Use of VSME Digital Template

58. Among those respondents (49%) that declared using different templates, some referred to their own templates based on the VSME Digital Template, while others referred to templates provided by consultancy firms as well as national developed templates (such as DNK and NSRS). When asked what could be improved on the VSME Digital Template, preparers mentioned the need to have tools available in local languages as specific terminology differs from local practices, a guidance text on the usage, improved user-friendliness of the tool as it is seen by few as still too complicated (long drop-down menus not relevant for all the sectors), the possibility to report on the

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distribution of energy consumption from district heating in addition to electricity, and finally the option to allow companies to enter historical data. From the users' perspective, suggestions included improving the visual layout, correcting data entry issues and providing more explanatory text. Other respondents recommended making easier to copy for different setups, improving usability and user experience (by correcting errors and simplifying visuals), providing the possibility to personalise the tool with logos and colours, offering more language translations, inserting a reference to GHG calculator and calculator for MWh and emissions, and mentioning specific distance for 'near biodiversity area'.

59. On these points, the EFRAG Secretariat notes that certain issues flagged by respondents have been already addressed in the latest release of the VSME Digital Template on 27 November 2025, which included a technical FAQ, additional translations, as well as fixes of issues identified on GitHub.
60. In terms of using the GHG calculators mentioned on EFRAG's website following the publication of the mapping of digital tools in September 2025, the majority of respondents (74%) declared that they have not used them. Only a few (20%) reported using the GHG calculators list: among those, 15% found it very useful and 5% encountered issues in using the calculators. Among the few respondents who encountered issues in using the calculators, the following reasons were mentioned: (i) calculators alone do not provide sufficient understanding on how to conduct the calculation most efficiently, which adds to the administrative burden of the company; (ii) emissions factors are not up to date; that a calculator should be available for every country. Finally, a few respondents (6%) did not use the list of GHG calculators as they are using other calculators. Please note that the mapping of GHG calculators mentioned on EFRAG's website was only released in late September 2025; therefore, the interpretation of the survey answers at this stage may be premature.

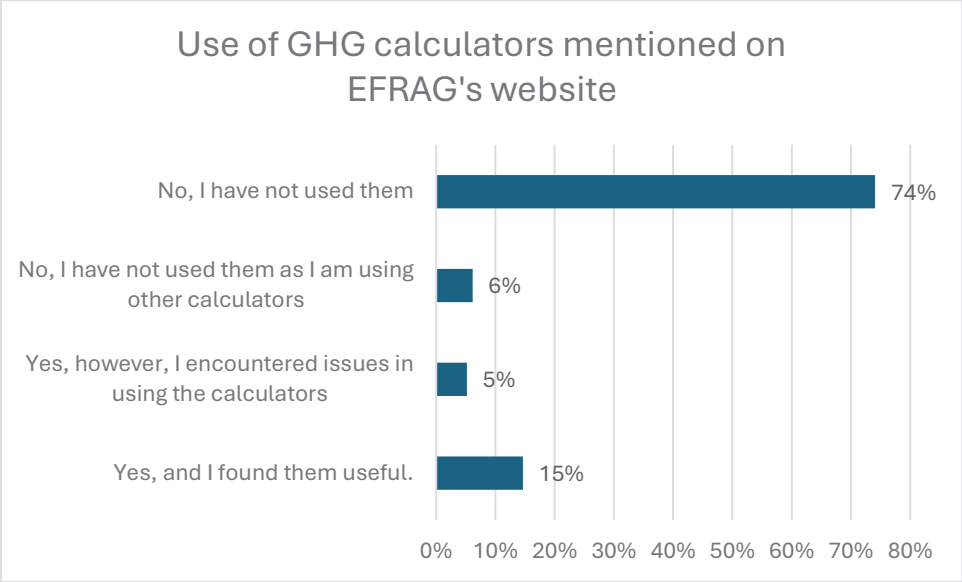


Figure 21: Use of GHG calculators mentioned on EFRAG's website

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61. The two tables below summarise, from the preparers' perspective, the disclosures considered to be the most complex and the easiest, and, from all respondents' point of view, the disclosures asked significantly by business counterparts, for both th
Basic Module and the Comprehensive Module, respectively.

Table 1: Most complex/easiest disclosures and disclosures asked significantly by business counterparts from the Basic Module

Basic Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
B1 - Basis for preparation	2%	(a) Paragraph 24(e)(iv) (turnover in monetary units) (b) Paragraph 25 (sustainability-related certification or label)	12%	(a) Paragraph 24(e) (b) Easy data availability	1.5%	
B2 - Practices, policies and future initiatives for transitioning towards a more sustainable economy	7.5%	(a) Hard to understand what to report and what not to report (b) Difficult to identify all the initiatives that can be included (c) Target setting is complex (d) The table for reporting on practices and initiatives is not suitable for presenting the many measures that can be reported	9%	(a) Requirements are part of the business	7.5%	(a) Requested by partners
B3 – Energy and greenhouse gas emissions	27%	(a) GHG emission calculation is complex (also for financial institutions) (b) Large area to cover and training is needed, could be done with tools (c) Scope 3 calculation is hard	26%	(a) Easy data availability	35%	(a) Required as a basis (b) Energy costs are not available in the other financial publications (c) Information especially on Scope 1 and Scope 2 (d) Large organisations in the downstream value chain (e) Requested from banks, large costumers, large undertakings,

Basic Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
						commercial partners of micro and SMEs, and administrator for call for tenders
B4 – Pollution of air, water and soil	6%	(a) Calculation is complex (b) Pollution elements are not described enough	8.5%		5%	
B5 – Biodiversity	11%	(a) Definition of biodiversity is not clear and quantification is complex (b) Data collection is hard (c) Simplified guidance and sector-specific support would be helpful	7.5%		3%	
B6 – Water	10%	(a) Reliable data collection is hard (b) Calculation is complex	10%	(a) Easy data availability	4.5%	(a) Requested from banks
B7 – Resource use, circular economy and waste management	17%	(a) Reliable data collection is hard (b) Calculation is complex (c) Interpretation issues on which data to include (d) Annual mass flow is difficult to understand	11%	(a) Already demanded by waste organisations	8%	(a) Requested from banks
B8 – Workforce – General characteristics	2%		44%	(a) Already demanded by national laws (b) Easy data availability (c) Paragraph 38(a) (number of employees in headcount or full-time equivalent for type of employment contract)	4.5%	(a) Requested from business counterparts and administrators for call for tenders
B9 – Workforce – Health and safety	2%		39%	(a) Already demanded by national laws	5%	(a) Requested from business counterparts and administrators for call for tenders

Basic Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
B10 – Workforce – Remuneration, collective bargaining and training	7%	(a) Sensitive data issue (b) Calculation is not clear (c) Interpretation issues on which data to consider (d) Data collection is hard	37%	(a) Already demanded by national laws	4.1%	(a) Requested from business counterparts and administrators for call for tenders
B11 – Convictions and fines for corruption and bribery	2%	(a) Sensitive data issue (b) Calculation is not clear (c) Data collection is hard	16%	(a) Easy and accessible information	3%	(a) Requested from banks and business counterparts

Table 2: Most complex/easiest disclosures and disclosures asked significantly by business counterparts from the Comprehensive Module

Comprehensive Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
C1 – Strategy: Business model and sustainability-related initiatives	1%	(a) Long process to set a sustainability strategy	3%		1%	(a) Commonly asked by costumers and investors
C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	7.5%	(a) Hard to understand what to report and what not to report (b) Difficult to identify all the initiatives that can be included (c) Target setting is complex	5%		9%	(a) Required as a basis (b) Requested by partners and banks
Consideration when reporting on GHG emissions under B3 (Basic Module)	9%	(a) Calculation of Scope 3 is complex (b) Data collection is hard / poor data availability	4%		4%	(a) Key aspect for transportation enterprises
C3 – GHG reduction targets and climate transition	15%	(a) Calculation of GHG reduction targets is complex (also for financial institutions) (b) Data collection is hard (c) Lack of information	4%		11%	(a) Required as a basis (b) Climate strategy and product footprints asked by partners (c) Requested from banks, large costumers, large undertakings,

Comprehensive Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
		(d) Long process to set emission targets (e) Often related to value chain (that is not a major topic for VSME) (f) Simplified guidance and sector-specific support would be helpful				commercial partners of micro and SMEs. (d) Large organisations in the downstream value chain
C4 – Climate risks	10%	(a) Calculation is complex; methodology needed (b) Climate risk brings uncertainty and definition is not clear (c) Often related to value chain (that is not a major topic for VSME) (d) It would be useful to illustrate expectations and how to meet disclosure requirements (C4 p.57(b) and p.58).	3%	(a) Easy availability of data	10%	(a) Required as a basis, also from banks
C5– Workforce (General) Additional characteristics	2%		31%	(a) Already demanded by national laws	3%	(a) Requested from administrators for call for tenders
C6 – Additional own workforce information - Human rights policies and processes	2%		34%	(a) Already demanded by national laws	4%	(a) Requested from administrators for call for tenders

Comprehensive Module	Most complex (preparers only)	Comment	Easiest (preparers only)	Comment	Disclosures asked significantly by business counterparts	Comment
C7 – Severe negative human rights incidents	2%	(a) Guidance needed	8%	(a) Already demanded by national laws	6%	(a) Commonly asked especially by costumers and investors (b) Requested from administrators for call for tenders
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	/		8%	(a) Easy and accessible information	2%	(a) Asked especially from banks
C9 – Gender diversity ratio in governance body	/		11%	(a) Easy and accessible information	1%	(a) Asked especially from banks

62. When asked what **additional disclosures business counterparts require on top of the VSME**, respondents provided different answers. The table highlights the additional disclosures that business counterparts commonly request beyond VSME disclosures. The items highlighted in green indicate the information was requested by all the three categories of preparers, users and others.

Table 3: Recurring disclosures asked on top of the VSME

Preparers	Users	Others
	Sectorial information (i.e. food safety) (1 mention)	Sectorial information (2 mentions)
ESRS requirements (DMA, IROs) (4 mentions)		
Consumer topics: data protection, information on cybersecurity, consumer satisfaction (6 mentions)		
Training on anti-corruption (3 mentions)	Business conduct (anti-corruption, anti-money laundering) (4 mentions)	Disclosures on business conduct (corruption, conflicts of interest, responsible purchases) (1 mention)
SFDR disclosures (no specific) (1 mentions)	SFDR PAI (no specific) (2 mentions)	
Decarbonisation plans (2 mentions)	Net zero commitment (2 mentions)	
Scope 3 (6 mentions)	Breakdown of all 15 Scope 3 categories (3 mentions)	Scope 3 (2 mentions)
Disclosures related to the product: PCF[3]/LCA[4]/EPD[5], product carbon footprint and share of recycled material Detailed product-level and delivery-specific information (5 mentions)	Information on products Product carbon footprint (3 mentions)	Carbon footprint Product specific information PCF (3 mentions)
Due Diligence information/ assessment on human rights and supply chains (3 mentions)	Due Diligence assessment for supplier, CDP[6] supply chain (8 mentions)	Information on human rights in the value chain and supply chain (5 mentions)
	Number of reports via whistleblowing channels (3 mentions)	
Information necessary for Alignment with EU Taxonomy (1 mentions)	EU Taxonomy eligible and aligned runover/CapEx/OpEx (4 mentions)	EU Taxonomy (2 mentions)

[3] Product Carbon Footprint.
[4] Life Cycle Assessment.
[5] Environmental Product Declaration.
[6] Carbon Disclosure Project.

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Information necessary for EcoVadis rating (3 mentions) [7]	Third-party assurance (1 mentions)	Information necessary for EcoVadis (third-party ratings) (5 mentions)
	SBTi targets (3 mentions)	SBTi (1 mention)
Risk assessments (1 mention)	Percentage of assets located in high climate-risk areas (floods, droughts, wildfires) and estimated cost of potential climate-related damages (3 mentions)	

63. In general, respondents reported that many business counterparts request additional information beyond the VSME. The most frequent extra requests concern:

    (a) Due Diligence assessment and information on supply chain (mentioned by 16 respondents),
    (b) Scope 3 (mentioned by 11 respondents),
    (c) Product carbon footprint (mentioned by 11 respondents),
    (d) Business conduct (training on anti-corruption) (mentioned by 8 respondents),
    (e) Information necessary for alignment with EU Taxonomy (mentioned by 7 respondents).

64. There were also some isolated comments on energy efficiency on buildings, amount of green/social bonds or loans raised, integration of ESG risks into overall enterprise risk management.

65. Regarding the usage of EFRAG's supporting materials, the majority of respondents (59%) have not yet used the supporting materials to implement the VSME, while the remaining (41%) have already made use of them.

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[7] In EFRAG's interpretation, this represents a separate questionnaire that cannot be considered for identifying additional datapoints to VSME.

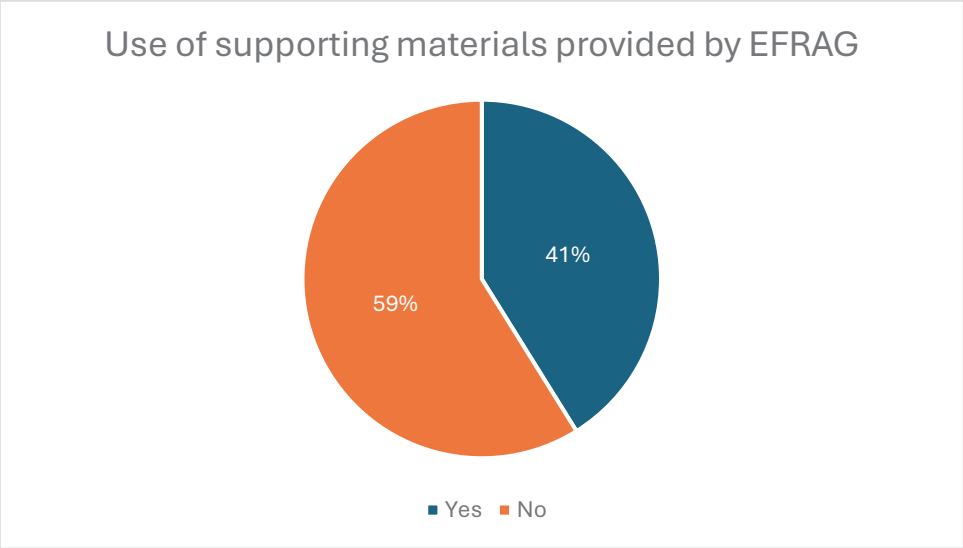


Figure 22: Use of supporting materials provided by EFRAG

66. Among those who used the supporting materials, the majority of respondents pointed out the use of the interactive webinars (48%) and the step-by-step tutorial (43%), while only a few indicated the video explainer (9%).

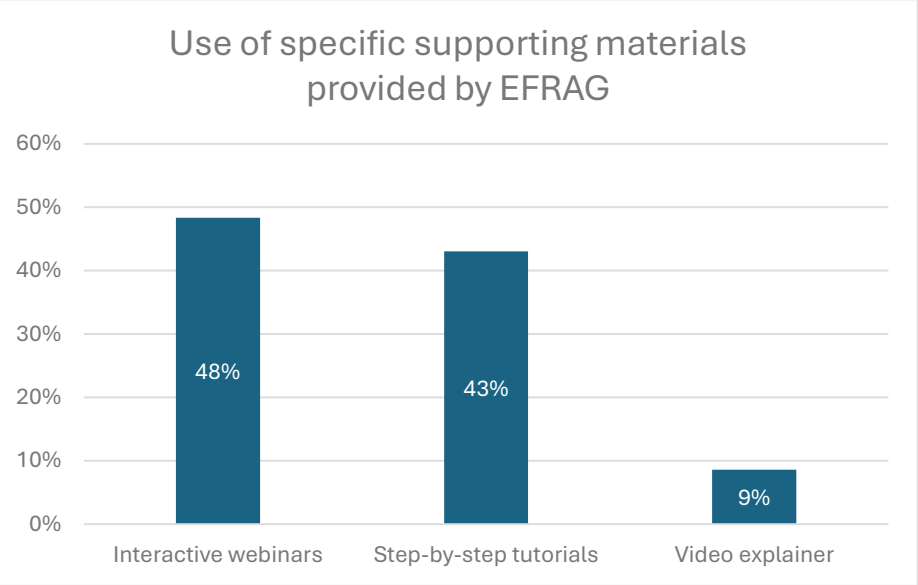


Figure 23: Use of specific supporting materials provided by EFRAG

67. When asked **what type of additional support** would be most helpful, the majority of respondents (50%) suggested case studies or examples, followed by more practical guidance (34%) and training sessions (4%).

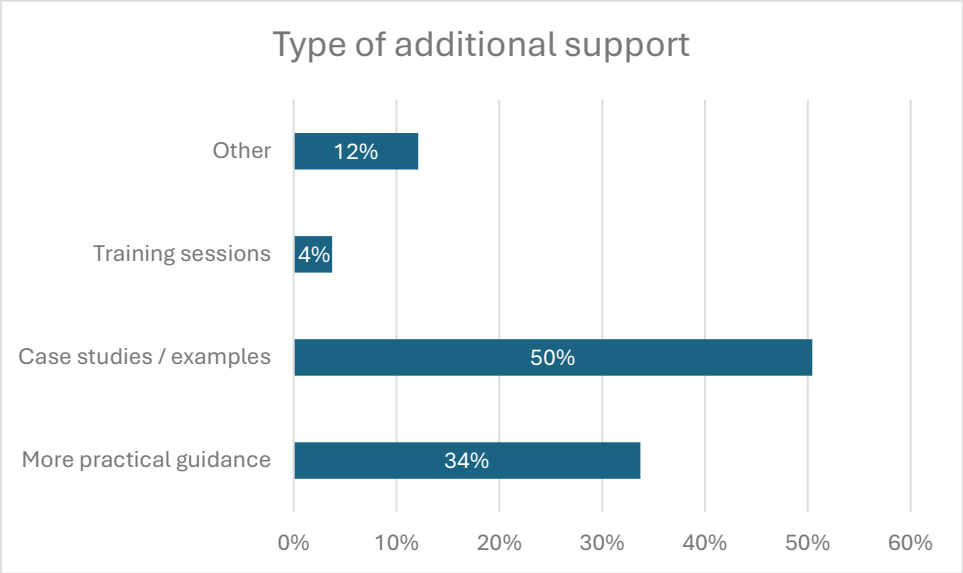


Figure 24: Type of additional support needed

68. In the group of respondents who would need **more practical guidance** as additional support, the most recurrent topics identified are listed below in order of frequency:
    (a) B3 (energy and greenhouse gas emissions);
    (b) C3 (GHG reduction targets and climate transition, with a specific mention of **Scope 3**);
    (c) C2 (description of practices, policies and future initiatives for transitioning towards a more sustainable economy);
    (d) B5 (biodiversity);
    (e) C4 (climate risks);
    (f) B7 (circular economy requirements such as material-flow reporting).
69. Please note that the Supporting Guides for C2, C3 and C7 have just being published on 11 December 2025. These guides will address some of the existing requests for guidance and case studies related to these disclosures. In addition, the recent release of the GHG Calculator mapping on EFRAG's website in late September 2025 will help meet the demand for further guidance and examples on B3, acknowledging the low level of public awareness. In the future, EFRAG Secretariat hopes to map also biodiversity and water stress tools that did not emerged in the recent Call for interest of the mapping to satisfy on the demand for additional support on B5 and B6.
70. In addition, a significant need emerged for **sector-specific guidance** and materials, including complete VSME sector-specific sample reports. In particular, users highlighted the need for more pedagogical and step-by-step materials, with examples to help SMEs interpret reporting expectations.
71. For respondents who chose **case studies/examples** as the **most helpful additional support**, the repeated call was, similarly, for concrete, practical, and sector-specific examples that illustrate how the VSME disclosures should be applied in real scenarios.
72. Respondents most frequently asked for examples of complete VSME reports, including best-practice models and detailed illustrations for specific disclosures that are listed below in order of frequency:

(a) B3 (energy and greenhouse gas emissions);
(b) B5 (biodiversity);
(c) B7 (circular economy requirements such as material-flow reporting);
(d) C3 (GHG reduction targets and climate transition);
(e) C4 (climate risks);
(f) B6 (water);
(g) Consideration when reporting on GHG emissions under B3 (Basic Module).

73. Preparers expressed a strong demand for practical examples of completed VSME reports. In particular, they emphasised the need for examples on gender pay-gap calculations, workforce indicators, Scope 3 category calculations and material-flow reporting.
74. Users particularly highlighted their need for case studies, emphasising the value of practical illustrations showing how SMEs can develop and evolve their narratives on strategy and policy.
75. 12% of respondents indicated that they would need **other types of additional support**, such a centralised repository of SMEs' reports, alignment with EBA Guidelines on ESG risk management, a verification guidance of calculation methodology for auditors, the addition of the materiality analysis[8], and the promotion of training sessions and official certification programmes.
76. When asked **what could be done to foster the market acceptance of the VSME**, respondents proposed a wide range of suggestions. All respondents mainly asked:
    (a) to increase awareness on the VSME– through examples of VSME reports, training sessions, best cases and practical examples, guidance, better communication and sensibilisation, proof and better highlighting of benefits, national awareness activities;
    (b) to recognise the VSME as binding limit for sustainability information for non-reporting companies – making the VSME compulsory at least for medium-sized undertakings; establishing a third level for companies above the 250 FTE and below the future CSRD threshold that covers more of the PAI required by banks;
    (c) for alignment with banks and financial institution requests – integrating/aligning information requested by banks with the VSME; banks should request VSME reports instead of their own templates;
    (d) to improve awareness among large undertakings – integrating information requested by large companies; raising awareness among large companies, as they should request the VSME for sustainability reporting for SMEs;
    (e) for simplified forms and free accessible online tools[9] – including translations of documents and materials in local languages; simplification of the Standard and its materials; clarification on value chain cap; integration of the VSME into reporting software, tools and systems; comparability between data and undertakings; free tools to support reporting

[8] Please note that the materiality assessment is not requested by the VSME; therefore, the request may be misaligned with the VSME's expectations.
[9] Please note that the first release of the VSME Digital Template was published in May 2025, with updates issued in October 2025 following the EC Recommendation and in November 2025 to include additional translations; therefore, the interpretation of the survey answers at this stage may be premature. The same applies to the release of the mapping of GHG calculators mentioned on EFRAG's website, which was only released in late September 2025; therefore, the interpretation of the survey answers at this stage may be premature.

and metrics (e.g. calculation of emissions); simplification of data points requested; establishment of a centralised digital platform;

(f) for a certification mechanism – official certification process for the VSME report to support credibility (GRI style);

(g) for incentives – financial/fiscal incentives or others for those who report under the VSME;

(h) to ensure alignment with other frameworks – ESRS, IROs, SFDR, IFRS/SASB.

77. In particular, users also mentioned:

(a) to ensure proportionality of the VSME – clarifying the intended scope of the VSME and ensuring that reporting frameworks remain proportionate to company size and market relevance.

78. Several of the suggestions mentioned fall outside EFRAG's mandate, either because they relate to Level 1 legislation or involve actions that do not fall within EFRAG's remit. For example, requests for further clarification of the value chain cap, proposals concerning financial incentives, or calls for the establishment of a centralised repository extend beyond EFRAG's mandate.

Conclusions

79. Overall, the survey indicates that market acceptance of the VSME is developing positively, with a solid level of awareness across preparers, users and other stakeholders. Translations in all EU languages have been deemed as useful for understanding the VSME and fostering awareness across the EU. Many preparers and users have already applied the VSME, using both the Basic and Comprehensive Modules, and employ it as a guiding framework for information collection, although regulatory uncertainty linked to the Omnibus proposal has slowed further uptake.

80. Respondents highlighted several practical challenges, including limited training, unclear methodologies and insufficient tools as well as the absence of a centralised digital repository to make the information provided by companies more usable. On the benefit side, respondents reported improved access to finance, cost optimisation and strategic advantages.

81. Awareness of EFRAG's supporting materials is growing, but at the moment is still low, probably due to the recent publication of the materials and tools. Respondents expressed a clear need for more step-by-step guidance, sector-specific guidance and case studies on complex disclosures.

82. Moreover, the continued evolution of digital enablers, such as updates of the VSME Digital Template, a more comprehensive list of GHG calculators and identification of other digital tools for water stress, biodiversity and geolocation, emerges to be an essential component to support SMEs in their sustainability reporting journey.

83. On the basis of these results, EFRAG Secretariat will consider to develop further practical guidance on specific disclosures (possibly also sector guidance), initiate a collection of practical examples of completed VSME reports to gather best practices, continue the work on the VSME Digital template as well as on the mapping of digital tools as well as platforms for SME sustainability reporting. Finally, EFRAG Secretariat plans to reassess progress through a second market acceptance survey in 2026.

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EFRAG

sustainability reporting

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I

(Veröffentlichungsbedürftige Rechtsakte)

VERORDNUNG (EG) Nr. 1893/2006 DES EUROPÄISCHEN PARLAMENTS UND DES RATES

vom 20. Dezember 2006

zur Aufstellung der statistischen Systematik der Wirtschaftszweige NACE Revision 2 und zur Änderung der Verordnung (EWG) Nr. 3037/90 des Rates sowie einiger Verordnungen der EG über bestimmte Bereiche der Statistik

(Text von Bedeutung für den EWR)

DAS EUROPÄISCHE PARLAMENT UND DER RAT DER EUROPÄISCHEN UNION –

gestützt auf den Vertrag zur Gründung der Europäischen Gemeinschaft, insbesondere auf Artikel 285 Absatz 1,

auf Vorschlag der Kommission,

nach Stellungnahme der Europäischen Zentralbank [1],

gemäß dem Verfahren des Artikels 251 des Vertrags [2],

in Erwägung nachstehender Gründe:

(1) Mit der Verordnung (EWG) Nr. 3037/90 des Rates [3] wurde die statistische Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (im Folgenden als „NACE

Gemeinschaft in allen Mitgliedstaaten einheitlich interpretiert werden.

(5) Die Unternehmen benötigen zuverlässige und vergleichbare Statistiken, um ihre Wettbewerbsfähigkeit beurteilen zu können, und solche Statistiken helfen den Gemeinschaftsorganen bei der Vermeidung von Wettbewerbsverzerrungen.

(6) Die Aufstellung einer überarbeiteten gemeinsamen statistischen Klassifikation der Wirtschaftszweige verpflichtet die Mitgliedstaaten nicht zur Erhebung, Veröffentlichung oder Bereitstellung von Daten. Nur wenn die von den Mitgliedstaaten verwendeten Wirtschaftszweigklassifikationen mit der Gemeinschaftsklassifikation verknüpft sind, ist es

„NACE-Code-Verordnung“ (48 Seiten, PDF)
Verordnung (EG) 1893/2006 vom 20.12.2006 zur Aufstellung der statistischen Systematik der Wirtschaftszweige NACE Revision 2 und zur Änderung der Verordnung (EWG) Nr. 3037/90 des Rates sowie einiger Verordnungen der EG über bestimmte Bereiche der Statistik.

https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32006R1893

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14 „NACE-Code-Verordnung“ (48 Seiten, PDF) Verordnung (EG) 1893/2006 vom 20.12.2006 zur Aufstellung der statistischen Systematik der Wirtschaftszweige NACE Revision 2 und zur Änderung der Verordnung (EWG) Nr. 3037/90 des Rates sowie einiger Verordnungen der EG über bestimmte Bereiche der Statistik.

#RV0594

I

(Veröffentlichungsbedürftige Rechtsakte)

VERORDNUNG (EG) Nr. 1893/2006 DES EUROPÄISCHEN PARLAMENTS UND DES RATES

vom 20. Dezember 2006

zur Aufstellung der statistischen Systematik der Wirtschaftszweige NACE Revision 2 und zur Änderung der Verordnung (EWG) Nr. 3037/90 des Rates sowie einiger Verordnungen der EG über bestimmte Bereiche der Statistik

(Text von Bedeutung für den EWR)

Stand: 01.02.2026

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nach Stellungnahme der Europäischen Zentralbank ([1]),

gemäß dem Verfahren des Artikels 251 des Vertrags ([2]),

in Erwägung nachstehender Gründe:

(1) Mit der Verordnung (EWG) Nr. 3037/90 des Rates ([3]) wurde die statistische Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (im Folgenden als „NACE Rev. 1“ oder „NACE Rev. 1.1“ bezeichnet) aufgestellt.

(2) Um der technischen Entwicklung und den strukturellen Veränderungen der Wirtschaft Rechnung zu tragen, sollte eine aktuelle Klassifikation mit der Bezeichnung NACE Revision 2 (im Folgenden als „NACE Rev. 2“ bezeichnet) aufgestellt werden.

(3) Eine auf dem neuesten Stand befindliche Klassifikation wie die NACE Rev. 2 ist für die fortdauernden Bemühungen der Kommission, die Erstellung der Gemeinschaftsstatistiken zu modernisieren, von zentraler Bedeutung; sie wird voraussichtlich durch besser vergleichbare und sachdienlichere Daten zu einer besseren Wirtschaftspolitik auf gemeinschaftlicher und nationaler Ebene beitragen.

(4) Der Binnenmarkt bedarf für sein Funktionieren statistischer Normen, die für die Erhebung, Übermittlung und Veröffentlichung nationaler und gemeinschaftlicher Statistiken gelten, so dass Unternehmen, Finanzinstitute, Regierungen und alle anderen Binnenmarktteilnehmer Zugang zu zuverlässigen und vergleichbaren statistischen Daten haben können. Hierfür ist es unabdingbar, dass die einzelnen Kategorien der Klassifikation der Wirtschaftszweige in der Gemeinschaft in allen Mitgliedstaaten einheitlich interpretiert werden.

(5) Die Unternehmen benötigen zuverlässige und vergleichbare Statistiken, um ihre Wettbewerbsfähigkeit beurteilen zu können, und solche Statistiken helfen den Gemeinschaftsorganen bei der Vermeidung von Wettbewerbsverzerrungen.

(6) Die Aufstellung einer überarbeiteten gemeinsamen statistischen Klassifikation der Wirtschaftszweige verpflichtet die Mitgliedstaaten nicht zur Erhebung, Veröffentlichung oder Bereitstellung von Daten. Nur wenn die von den Mitgliedstaaten verwendeten Wirtschaftszweigklassifikationen mit der Gemeinschaftsklassifikation verknüpft sind, ist es möglich, integrierte Informationen so zuverlässig, schnell, flexibel und so tief gegliedert bereit zu stellen, wie es für die Steuerung des Binnenmarktes erforderlich ist.

(7) Die Mitgliedstaaten sollten in die Lage versetzt werden, zur Berücksichtigung nationaler Bedürfnisse in ihren nationalen Klassifikationen zusätzliche Kategorien einzuführen, die sich auf die statistische Klassifikation der Wirtschaftszweige in der Gemeinschaft stützen.

(8) Für die internationale Vergleichbarkeit von Wirtschaftsstatistiken ist es erforderlich, dass die Mitgliedstaaten und die Gemeinschaftsorgane Wirtschaftszweigklassifikationen verwenden, die unmittelbar mit der International Standard Industrial Classification of all economic activities (ISIC) Rev. 4 (Internationale Systematik der Wirtschaftszweige (ISIC) Rev. 4) verknüpft sind, die von der Statistischen Kommission der Vereinten Nationen angenommenen worden ist.

(9) Der Einsatz der Wirtschaftszweigklassifikationen in der Gemeinschaft erfordert es, dass die Kommission vom dem durch den Beschluss 89/382/EWG, Euratom des Rates ([4]) eingesetzten Ausschuss für das statistische Programm unterstützt wird; dies gilt insbesondere für die Prüfung von Problemen, die sich aus der Umsetzung der NACE Rev. 2 ergeben, den vollständig koordinierten Übergang von der NACE Rev. 1 zur NACE Rev. 2 sowie die Ausarbeitung künftiger Änderungen der NACE Rev. 2.

([1]) ABl. C 79 vom 1.4.2006, S. 31.

([2]) Stellungnahme des Europäischen Parlaments vom 12. Oktober 2006 (noch nicht im Amtsblatt veröffentlicht) und Beschluss des Rates vom 19. Dezember 2006.

([3]) ABl. L 293 vom 24.10.1990, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1882/2003 des Europäischen Parlaments und des Rates (ABl. L 284 vom 31.10.2003, S. 1).

([4]) ABl. L 181 vom 28.6.1989, S. 47.

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(10) Mit der Verordnung (EWG) Nr. 2186/93 des Rates [1] ist ein gemeinsamer Rahmen für den Aufbau von statistischen Unternehmensregistern mit harmonisierten Definitionen, Merkmalen, Erfassungsbereich und Aktualisierungsverfahren geschaffen worden.

(11) Zur Aufstellung einer überarbeiteten statistischen Wirtschaftszweigklassifikation ist es notwendig, insbesondere die verschiedenen Verweise auf die NACE Rev. 1 anzupassen und mehrere einschlägige Instrumente zu ändern. Es ist daher notwendig, die folgenden Instrumente zu ändern: die Verordnung (EWG) Nr. 3037/90, die Verordnung (EWG) Nr. 3924/91 des Rates vom 19. Dezember 1991 zur Einführung einer Gemeinschaftserhebung über die Produktion von Gütern [2], die Verordnung (EG, Euratom) Nr. 58/97 des Rates vom 20. Dezember 1996 über die strukturelle Unternehmensstatistik [3], die Verordnung (EG) Nr. 1165/98 des Rates vom 19. Mai 1998 über Konjunkturstatistiken [4], die Verordnung (EG) Nr. 1172/98 des Rates vom 25. Mai 1998 über die statistische Erfassung des Güterkraftverkehrs [5], die Verordnung (EG) Nr. 530/1999 des Rates vom 9. März 1999 zur Statistik über die Struktur der Verdienste und der Arbeitskosten [6], die Verordnung (EG) Nr. 2150/2002 des Europäischen Parlaments und des Rates vom 25. November 2002 zur Abfallstatistik [7], die Verordnung (EG) Nr. 450/2003 des Europäischen Parlaments und des Rates vom 27. Februar 2003 über den Arbeitskostenindex [8], die Verordnung (EG) Nr. 48/2004 des Europäischen Parlaments und des Rates vom 5. Dezember 2003 über die Erstellung der jährlichen Statistiken der Gemeinschaft über die Stahlindustrie für die Berichtsjahre 2003-2009 [9], die Verordnung (EG) Nr. 808/2004 des Europäischen Parlaments und des Rates vom 21. April 2004 über Gemeinschaftsstatistiken zur Informationsgesellschaft [10] und die Verordnung (EG) Nr. 1552/2005 des Europäischen Parlaments und des Rates vom 7. September 2005 über die Statistik der betrieblichen Bildung [11].

(12) Vor der Umstellung auf die NACE Rev. 2 müssen mehrere Instrumente der Gemeinschaft nach den auf sie anzuwendenden besonderen Verfahren geändert werden, und zwar die Verordnung (EG) Nr. 2223/96 des Rates vom 25. Juni 1996 zum Europäischen System Volkswirtschaftlicher Gesamtrechnungen auf nationaler und regionaler Ebene in der Europäischen Gemeinschaft [12], die Verordnung (EG) Nr. 138/2004 des Europäischen Parlaments und des Rates vom 5. Dezember 2003 zur Landwirtschaftlichen Gesamtrechnung in der Gemeinschaft [13] sowie die Verordnung (EG) Nr. 184/2005 des Europäischen Parlaments und des Rates vom 12. Januar 2005 betreffend die gemeinschaftliche Statistik der Zahlungsbilanz, des internationalen Dienstleistungsverkehrs und der Direktinvestitionen [14].

(13) Die für die Durchführung dieser Verordnung erforderlichen Maßnahmen sollten gemäß dem Beschluss 1999/468/EG des Rates vom 28. Juni 1999 zur Festlegung der Modalitäten für die Ausübung der der Kommission übertragenen Durchführungsbefugnisse [15] erlassen werden.

(14) Insbesondere sollte die Kommission die Befugnis erhalten, die NACE Rev. 2 zu ändern oder zu ergänzen, um technologischen oder wirtschaftlichen Entwicklungen Rechnung zu tragen oder sie auf andere Wirtschafts- und Sozialklassifikationen auszurichten. Da es sich hierbei um Maßnahmen allgemeiner Tragweite handelt, die eine Änderung von nicht wesentlichen Bestimmungen dieser Verordnung bewirken oder eine Hinzufügung neuer nicht wesentlicher Bestimmungen dieser Verordnung bewirken, sollten diese Maßnahmen gemäß dem in Artikel 5a des Beschlusses 1999/468/EG genannten Regelungsverfahren mit Kontrolle erlassen werden.

(15) Da das Ziel dieser Verordnung, nämlich die Schaffung gemeinsamer statistischer Normen, die die Bereitstellung harmonisierter Daten ermöglichen, auf Ebene der Mitgliedstaaten nicht ausreichend verwirklicht werden kann und daher besser auf Gemeinschaftsebene zu verwirklichen ist, kann die Gemeinschaft im Einklang mit dem in Artikel 5 des Vertrags niedergelegten Subsidiaritätsprinzip tätig werden. Entsprechend dem in demselben Artikel genannten Grundsatz der Verhältnismäßigkeit geht diese Verordnung nicht über das zur Erreichung dieses Ziels erforderliche Maß hinaus.

(16) Der Ausschuss für das statistische Programm ist gehört worden –

HABEN FOLGENDE VERORDNUNG ERLASSEN:

ABSCHNITT I

ALLGEMEINE BESTIMMUNGEN

Artikel 1

Gegenstand und Geltungsbereich

1. Mit dieser Verordnung wird eine gemeinsame statistische Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft, im Folgenden als „NACE Rev. 2" bezeichnet, aufgestellt. Diese Klassifikation gewährleistet die Relevanz der gemeinschaftlichen Klassifikationen für die wirtschaftliche Wirklichkeit und

[1] ABl. L 196 vom 5.8.1993, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1882/2003.
[2] ABl. L 374 vom 31.12.1991, S. 1. Geändert durch die Verordnung (EG) Nr. 1882/2003.
[3] ABl. L 14 vom 17.1.1997, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1882/2003.
[4] ABl. L 162 vom 5.6.1998, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1503/2006 des Europäischen Parlaments und des Rates (ABl. L 281 vom 12.10.2006, S. 15).
[5] ABl. L 163 vom 6.6.1998, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1882/2003.
[6] ABl. L 63 vom 12.3.1999, S. 6. Zuletzt geändert durch die Verordnung (EG) Nr. 1882/2003.
[7] ABl. L 332 vom 9.12.2002, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 783/2005 der Kommission (ABl. L 131 vom 25.5.2005, S. 38).
[8] ABl. L 69 vom 13.3.2003, S. 1.
[9] ABl. L 7 vom 13.1.2004, S. 1.
[10] ABl. L 143 vom 30.4.2004, S. 49.
[11] ABl. L 255 vom 30.9.2005, S. 1.
[12] ABl. L 310 vom 30.11.1996, S. 1. Zuletzt geändert durch die Verordnung (EG) Nr. 1267/2003 des Europäischen Parlaments und des Rates (ABl. L 180 vom 18.7.2003, S. 1).
[13] ABl. L 33 vom 5.2.2004, S. 1. Geändert durch die Verordnung (EG) Nr. 909/2006 der Kommission (ABl. L 168 vom 21.6.2006, S. 14).
[14] ABl. L 35 vom 8.2.2005, S. 23. Geändert durch die Verordnung (EG) Nr. 602/2006 der Kommission (ABl. L 106 vom 19.4.2006, S. 10).
[15] ABl. L 184 vom 17.7.1999, S. 23. Geändert durch den Beschluss 2006/512/EG (ABl. L 200 vom 22.7.2006, S. 11).

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verbessert die Vergleichbarkeit zwischen nationalen, gemeinschaftlichen und internationalen Klassifikationen und somit auch von nationalen, gemeinschaftlichen und internationalen Statistiken.

2. Diese Verordnung gilt nur für die Verwendung der Klassifikation zu statistischen Zwecken.

Artikel 2

NACE Rev. 2

1. Die NACE Rev. 2 besteht aus:

a) einer ersten Ebene, deren Positionen mit einem alphabetischen Kode gekennzeichnet sind (Abschnitte);

b) einer zweiten Ebene, deren Positionen mit einem zweistelligen numerischen Kode gekennzeichnet sind (Abteilungen);

c) einer dritten Ebene, deren Positionen mit einem dreistelligen numerischen Kode gekennzeichnet sind (Gruppen); und

d) einer vierten Ebene, deren Positionen mit einem vierstelligen numerischen Kode gekennzeichnet sind (Klassen).

2. Die NACE Rev. 2 ist in Anhang I wiedergegeben.

Artikel 3

Verwendung der NACE Rev. 2

Die Kommission verwendet die NACE Rev. 2 für alle Statistiken, die nach Wirtschaftszweigen gegliedert sind.

Artikel 4

Nationale Wirtschaftszweigklassifikationen

1. Die Statistiken der Mitgliedstaaten, die nach Wirtschaftszweigen gegliedert dargeboten werden, werden unter Verwendung der NACE Rev. 2 oder einer von ihr abgeleiteten nationalen Klassifikation erstellt.

2. Die nationalen Klassifikationen können zusätzliche Positionen und Ebenen aufweisen; ebenso kann eine unterschiedliche Kodierung verwendet werden. Jede Ebene außer der höchsten besteht entweder aus denselben Positionen wie die entsprechende Ebene der NACE Rev. 2 oder aus Positionen, die eine genaue Untergliederung dieser Positionen darstellen.

3. Die Mitgliedstaaten übermitteln der Kommission die Entwurfsfassungen zur Festlegung oder Änderung ihrer nationalen Klassifikationen vor deren Veröffentlichung zur Genehmigung. Die Kommission prüft binnen zwei Monaten die Übereinstimmung dieser Entwurfsfassungen mit Absatz 2. Die Kommission übermittelt die genehmigten nationalen Klassifikationen den anderen Mitgliedstaaten zur Kenntnisnahme. Die nationalen Klassifikationen der Mitgliedstaaten enthalten eine Tabelle der Entsprechungen zwischen den nationalen Klassifikationen und der NACE Rev. 2.

4. Sollten sich bestimmte Positionen der NACE Rev. 2 als mit der nationalen Wirtschaftsstruktur unvereinbar erweisen, kann die Kommission einem Mitgliedstaat die Genehmigung erteilen, in einem bestimmten Sektor ein Aggregat von Positionen der NACE Rev. 2 zu verwenden.

Um eine solche Genehmigung zu erhalten, muss der betreffende Mitgliedstaat der Kommission alle Angaben bereitstellen, die für die Beurteilung des Antrags erforderlich sind. Die Kommission trifft ihre Entscheidung binnen drei Monaten.

Ungeachtet der Bestimmungen von Absatz 2 berechtigt eine solche Genehmigung den betreffenden Mitgliedstaat jedoch nicht dazu, die aggregierten Positionen anders zu untergliedern als die NACE Rev. 2.

5. Die Kommission überprüft zusammen mit dem betroffenen Mitgliedstaat in regelmäßigen Abständen, ob die gemäß Absatz 4 erteilten Genehmigungen noch gerechtfertigt sind.

Artikel 5

Aufgaben der Kommission

Die Kommission gewährleistet in Zusammenarbeit mit den Mitgliedstaaten die Verbreitung, Pflege und Förderung der NACE Rev. 2, indem sie insbesondere

a) Erläuterungen zur NACE Rev. 2 abfasst, aktualisiert und veröffentlicht,

b) Anleitungen zur Einordnung statistischer Einheiten gemäß der NACE Rev. 2 erstellt und veröffentlicht,

c) Korrespondenztabellen für die Entsprechungen zwischen der NACE Rev. 1.1 und der NACE Rev. 2 und zwischen der NACE Rev. 2 und der NACE Rev. 1.1 veröffentlicht und

d) auf eine Verbesserung der Kohärenz mit anderen Sozial- und Wirtschaftsklassifikationen hinarbeitet.

Artikel 6

Durchführungsmaßnahmen

1. Die folgenden Maßnahmen zur Umsetzung der NACE Rev. 2 werden nach dem in Artikel 7 Absatz 2 genannten Regelungsverfahren erlassen:

a) Entscheidungen, die bei Problemen erforderlich sind, die sich aus der Umsetzung der NACE Rev. 2 ergeben, einschließlich der Einreihung von wirtschaftlichen Tätigkeiten in bestimmte Klassen; und

b) technische Maßnahmen, die einen vollständig koordinierten Übergang von der NACE Rev. 1.1 zur NACE Rev. 2 sicherstellen, insbesondere hinsichtlich der Thematik von Brüchen in Zeitreihen, einschließlich doppelter Berichterstattung und der Rückrechnung von Zeitreihen.

2. Die Maßnahmen im Zusammenhang mit der NACE Rev. 2 zur Änderung oder Ergänzung von nicht-wesentlichen Bestimmungen dieser Verordnung werden nach dem in Artikel 7 Absatz 3 genannten Regelungsverfahren mit Kontrolle erlassen, wenn sie folgenden Zwecken dienen:

a) Berücksichtigung technischer oder wirtschaftlicher Entwicklungen; oder

b) Ausrichtung auf andere Wirtschafts- und Sozialklassifikationen.

3. Der Grundsatz, dass der Nutzen der Aktualisierung der NACE Rev. 2 deren Kosten überwiegen muss, und der Grundsatz,

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dass die zusätzlichen Kosten und Belastungen innerhalb vernünftiger Grenzen bleiben müssen, ist zu berücksichtigen.

Artikel 7

Ausschuss

1. Die Kommission wird von dem durch den Beschluss 89/382/EWG, Euratom, eingesetzten Ausschuss für das Statistische Programm unterstützt.

2. Wird auf diesen Absatz Bezug genommen, so gilt das Verfahren der Artikel 5 und 7 des Beschlusses 1999/468/EG unter Beachtung von dessen Artikel 8.

Der Zeitraum nach Artikel 5 Absatz 6 des Beschlusses 1999/468/EG wird auf drei Monate festgesetzt.

3. Wird auf diesen Absatz Bezug genommen, so gilt das Verfahren des Artikels 5a Absätze 1 bis 4 und des Artikels 7 des Beschlusses 1999/468/EG unter Beachtung von dessen Artikel 8.

Artikel 8

Durchführung der NACE Rev. 2

1. Die statistischen Einheiten, auf die in gemäß der Verordnung (EWG) Nr. 2186/93 eingerichteten Unternehmensregistern Bezug genommen wird, sind gemäß der NACE Rev. 2 einzuordnen.

2. Die Mitgliedstaaten erstellen Statistiken, die sich auf vom 1. Januar 2008 an durchgeführte Wirtschaftstätigkeiten beziehen, auf der Grundlage der NACE Rev. 2 oder einer von dieser gemäß Artikel 4 abgeleiteten nationalen Klassifikation.

3. Abweichend von Absatz 2 sind Konjunkturstatistiken gemäß der Verordnung (EG) Nr. 1165/98 und der Arbeitskostenindex gemäß der Verordnung (EG) Nr. 450/2003 ab dem 1. Januar 2009 im Einklang mit der NACE Rev. 2 zu erstellen.

4. Absatz 2 gilt nicht für folgende Statistiken:

a) Statistiken der Volkswirtschaftlichen Gesamtrechnungen gemäß der Verordnung (EG) Nr. 2223/96;

b) die Landwirtschaftliche Gesamtrechnung gemäß der Verordnung (EG) Nr. 138/2004; und

c) Statistiken der Zahlungsbilanz, des internationalen Dienstleistungsverkehrs und der Direktinvestitionen gemäß der Verordnung (EG) Nr. 184/2005.

ABSCHNITT II

ÄNDERUNG VERBUNDENER RECHTSVORSCHRIFTEN

Artikel 9

Änderung der Verordnung (EWG) Nr. 3037/90

Die Artikel 3, 10 und 12 der Verordnung (EG) Nr. 3037/90 werden gestrichen.

Artikel 10

Änderung der Verordnung (EWG) Nr. 3924/91

Die Verordnung (EG) Nr. 3924/91 wird wie folgt geändert:

1) Im gesamten Text wird „NACE Rev. 1“ durch „NACE Rev. 2“ ersetzt.

2) Artikel 2 Absatz 1 erhält folgende Fassung:

„1. Der Erhebungsbereich der Statistik nach Artikel 1 umfasst die Tätigkeiten der Abschnitte B und C der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2).“

Artikel 11

Änderung der Verordnung (EG, Euratom) Nr. 58/97

Die Verordnung (EG, Euratom) Nr. 58/97 wird wie folgt geändert:

1) Im gesamten Text und in den Anhängen wird „NACE Rev. 1“ durch „NACE Rev. 2“ ersetzt, jedoch nicht in Anhang 1 Abschnitt 10 „Berichte und Pilotuntersuchungen“, Anhang 3 Abschnitt 5 „Erstes Berichtsjahr“ und Anhang 3 Abschnitt 9 „Berichte und Pilotuntersuchungen“, wo die Angabe „NACE Rev. 1“ bestehen bleibt.

2) Artikel 3 Absatz 1 erhält folgende Fassung:

„1. Diese Verordnung gilt für alle marktwirtschaftlichen Tätigkeiten der Abschnitte B bis N und P bis S der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2).“

3) Die Anhänge werden nach Maßgabe des Anhangs II der vorliegenden Verordnung geändert.

Artikel 12

Änderung der Verordnung (EG) Nr. 1165/98

Die Verordnung (EG) Nr. 1165/98 wird wie folgt geändert:

1) Artikel 2 Absatz 1 erhält folgende Fassung:

„1. Diese Verordnung gilt für alle marktwirtschaftlichen Tätigkeiten der Abschnitte B bis N und P bis S der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2).“

2) In Artikel 17 werden folgende Buchstaben angefügt:

„k) das erste Basisjahr, das für Zeitreihen gemäß der NACE Rev. 2 anzuwenden ist;

l) für Zeitreihen vor 2009, die gemäß der NACE Rev. 2 zu übermitteln sind, die Gliederungstiefe, die Form, den ersten Berichtszeitraum und den Berichtszeitraum.“

3) Die Anhänge werden nach Maßgabe des Anhangs III der vorliegenden Verordnung geändert.

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Artikel 13

Änderung der Verordnung (EG) Nr. 1172/98

Im gesamten Text und in den Anhängen der Verordnung (EG) Nr. 1172/98 werden „NACE Rev. 1“ und „NACE Rev. 1.1“ durch „NACE Rev. 2“ ersetzt.

Artikel 14

Änderung der Verordnung (EG) Nr. 530/1999

Die Verordnung (EG) Nr. 530/1999 wird wie folgt geändert:

1) Im gesamten Text wird „NACE Rev. 1“ durch „NACE Rev. 2“ ersetzt.

2) In Artikel 3

a) erhält Absatz 1 folgende Fassung:

„1. Die Statistik erfasst alle Wirtschaftszweige der Abschnitte B (Bergbau und Gewinnung von Steinen und Erden), C (Verarbeitendes Gewerbe/Herstellung von Waren), D (Energieversorgung), E (Wasserversorgung; Abwasser- und Abfallentsorgung und Beseitigung von Umweltverschmutzungen), F (Baugewerbe/Bau), G (Handel; Instandhaltung und Reparatur von Kraftfahrzeugen), H (Verkehr und Lagerei), I (Gastgewerbe/Beherbergung und Gastronomie), J (Information und Kommunikation), K (Erbringung von Finanz- und Versicherungsdienstleistungen), L (Grundstücks- und Wohnungswesen), M (Erbringung von freiberuflichen, wissenschaftlichen und technischen Dienstleistungen), N (Erbringung von sonstigen wirtschaftlichen Dienstleistungen), P (Erziehung und Unterricht), Q (Gesundheits- und Sozialwesen), R (Kunst, Unterhaltung und Erholung) und S (Erbringung von sonstigen Dienstleistungen) der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2).“

b) wird Absatz 2 gestrichen.

Artikel 15

Änderung der Verordnung (EG) Nr. 2150/2002

Die Verordnung (EG) Nr. 2150/2002 wird wie folgt geändert:

1) Im gesamten Text und in den Anhängen werden „NACE Rev. 1“ und „NACE Rev. 1.1“ durch „NACE Rev. 2“ ersetzt.

2) Anhang I der Verordnung (EG) Nr. 2150/2002 wird nach Maßgabe des Anhangs IV der vorliegenden Verordnung geändert.

Artikel 16

Änderung der Verordnung (EG) Nr. 450/2003

Die Verordnung (EG) Nr. 450/2003 wird wie folgt geändert:

1) Im gesamten Text wird „NACE Rev. 1“ durch „NACE Rev. 2“ ersetzt.

2) Artikel 3 erhält folgende Fassung:

„*Artikel 3*

Erfassungsbereich

1. Diese Verordnung erstreckt sich auf alle Wirtschaftszweige der Abschnitte B bis S der NACE Rev. 2.

2. Die Aufnahme der Wirtschaftszweige der Abschnitte O bis S der NACE Rev. 2 in den Anwendungsbereich dieser Verordnung wird nach dem in Artikel 12 Absatz 2 genannten Verfahren und unter Berücksichtigung der Durchführbarkeitsstudien nach Artikel 10 festgelegt.“

3) Artikel 5 erhält folgende Fassung:

„*Artikel 5*

Häufigkeit und Rückrechnungen

1. Die Daten für den AKI werden erstmals gemäß der NACE Rev. 2 für das erste Quartal 2009 und danach für jedes Quartal (das am 31. März, 30. Juni, 30. September bzw. 31. Dezember jedes Jahres endet) erstellt.

2. Rückrechnungen für den Zeitraum vom ersten Quartal 2000 bis zum vierten Quartal 2008 werden von den Mitgliedstaaten zur Verfügung gestellt. Die Rückrechnungen werden für jeden der Abschnitte B bis N der NACE Rev. 2 und für die in Artikel 4 Absatz 1 genannten Bestandteile der Arbeitskosten bereitgestellt.“

4) Artikel 6 Absatz 3 erhält folgende Fassung:

„3. Die in Artikel 5 genannten rückgerechneten Daten werden der Kommission (Eurostat) gleichzeitig mit dem AKI für das erste Quartal 2009 übermittelt.“

5) Artikel 11 Buchstabe c erhält folgende Fassung:

„c) die Aufnahme der Abschnitte O bis S der NACE Rev. 2 (Artikel 3),“

Artikel 17

Änderung der Verordnung (EG) Nr. 48/2004

Artikel 3 Absatz 1 der Verordnung (EG) Nr. 48/2004 erhält folgende Fassung:

„Diese Verordnung bezieht sich auf Daten über die Stahlindustrie, die als Gruppe 24.1 der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2) festgelegt ist.“

Artikel 18

Änderung der Verordnung (EG) Nr. 808/2004

Anhang I der Verordnung (EG) Nr. 808/2004 wird nach Maßgabe des Anhangs V der vorliegenden Verordnung geändert.

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Artikel 19

Änderung der Verordnung (EG) Nr. 1552/2005

Die Verordnung (EG) Nr. 1552/2005 wird wie folgt geändert:

1) Im gesamten Text wird „NACE Rev. 1.1“ durch „NACE Rev. 2“ ersetzt.

2) Artikel 2 Absatz 2 wird gestrichen.

3) Artikel 4 erhält folgende Fassung:

„*Artikel 4*

Erfassungsbereich der Statistiken

Die Statistiken über die betriebliche Bildung erfassen mindestens alle Wirtschaftszweige der Abschnitte B bis N und R bis S der NACE Rev. 2.“

ABSCHNITT III

SCHLUSSBESTIMMUNGEN

Artikel 20

Übergangsbestimmungen

Entsprechend den Erfordernissen der Verordnung (EG, Euratom) Nr. 58/97 übermitteln die Mitgliedstaaten der Kommission (Eurostat) die strukturellen Unternehmensstatistiken für das Kalenderjahr 2008 sowohl gemäß der NACE Rev. 1.1 als auch gemäß der NACE Rev. 2.

Für jeden Anhang der Verordnung (EG, Euratom) Nr. 58/97 wird über die Liste der Merkmale und die erforderlichen Untergliederungen, die gemäß der NACE Rev. 1.1 zu übermitteln sind, gemäß dem Verfahren des Artikels 13 jener Verordnung entschieden.

Artikel 21

Inkrafttreten

Diese Verordnung tritt am zwanzigsten Tage nach ihrer Veröffentlichung im Amtsblatt der Europäischen Union in Kraft.

Sie gilt ab dem 1. Januar 2008.

Diese Verordnung ist in allen ihren Teilen verbindlich und gilt unmittelbar in jedem Mitgliedstaat.

Geschehen zu Brüssel am 20. Dezember 2006.

Im Namen des Europäischen Parlaments	*Im Namen des Rates*
Der Präsident	*Der Präsident*
J. BORRELL FONTELLES	J. KORKEAOJA

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ANHANG I

NACE REV. 2

a. n. g.: anderweitig nicht genannt *Teil von

Abteilung	Gruppe	Klasse		ISIC Rev. 4
			ABSCHNITT A — LAND- UND FORSTWIRTSCHAFT, FISCHEREI	
01			Landwirtschaft, Jagd und damit verbundene Tätigkeiten	
	01.1		Anbau einjähriger Pflanzen	
		01.11	Anbau von Getreide (ohne Reis), Hülsenfrüchten und Ölsaaten	0111
		01.12	Anbau von Reis	0112
		01.13	Anbau von Gemüse und Melonen sowie Wurzeln und Knollen	0113
		01.14	Anbau von Zuckerrohr	0114
		01.15	Anbau von Tabak	0115
		01.16	Anbau von Faserpflanzen	0116
		01.19	Anbau von sonstigen einjährigen Pflanzen	0119
	01.2		Anbau mehrjähriger Pflanzen	
		01.21	Anbau von Wein- und Tafeltrauben	0121
		01.22	Anbau von tropischen und subtropischen Früchten	0122
		01.23	Anbau von Zitrusfrüchten	0123
		01.24	Anbau von Kern- und Steinobst	0124
		01.25	Anbau von sonstigem Obst und Nüssen	0125
		01.26	Anbau von ölhaltigen Früchten	0126
		01.27	Anbau von Pflanzen zur Herstellung von Getränken	0127
		01.28	Anbau von Gewürzpflanzen, Pflanzen für aromatische, narkotische und pharmazeutische Zwecke	0128
		01.29	Anbau sonstiger mehrjähriger Pflanzen	0129
	01.3		Betrieb von Baumschulen, sowie Anbau von Pflanzen zu Vermehrungszwecken	
		01.30	Betrieb von Baumschulen, sowie Anbau von Pflanzen zu Vermehrungszwecken	0130
	01.4		Tierhaltung	
		01.41	Haltung von Milchkühen	0141*
		01.42	Haltung von anderen Rindern	0141*
		01.43	Haltung von Pferden und Eseln	0142
		01.44	Haltung von Kamelen	0143
		01.45	Haltung von Schafen und Ziegen	0144
		01.46	Haltung von Schweinen	0145
		01.47	Haltung von Geflügel	0146
		01.49	Sonstige Tierhaltung	0149
	01.5		Gemischte Landwirtschaft	
		01.50	Gemischte Landwirtschaft	0150
	01.6		Erbringung von landwirtschaftlichen Dienstleistungen	
		01.61	Erbringung von landwirtschaftlichen Dienstleistungen für den Pflanzenbau	0161
		01.62	Erbringung von landwirtschaftlichen Dienstleistungen für die Tierhaltung	0162
		01.63	Nach der Ernte anfallende Tätigkeiten in der pflanzlichen Erzeugung	0163
		01.64	Saatgutaufbereitung	0164
	01.7		Jagd, Fallenstellerei und damit verbundene Tätigkeiten	
		01.70	Jagd, Fallenstellerei und damit verbundene Tätigkeiten	0170
02			Forstwirtschaft und Holzeinschlag	
	02.1		Forstwirtschaft	
		02.10	Forstwirtschaft	0210
	02.2		Holzeinschlag	
		02.20	Holzeinschlag	0220
	02.3		Sammeln von wildwachsenden Produkten (ohne Holz)	
		02.30	Sammeln von wildwachsenden Produkten (ohne Holz)	0230

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a. n. g.: anderweitig nicht genannt *Teil von

Abteilung	Gruppe	Klasse		ISIC Rev. 4
	02.4		Erbringung von Dienstleistungen für Forstwirtschaft und Holzeinschlag	
		02.40	Erbringung von Dienstleistungen für Forstwirtschaft und Holzeinschlag	0240
03			Fischerei und Aquakultur	
	03.1		Fischerei	
		03.11	Meeresfischerei	0311
		03.12	Süßwasserfischerei	0312
	03.2		Aquakultur	
		03.21	Meeresaquakultur	0321
		03.22	Süßwasseraquakultur	0322
			ABSCHNITT B — BERGBAU UND GEWINNUNG VON STEINEN UND ERDEN	
05			Kohlenbergbau	
	05.1		Steinkohlenbergbau	
		05.10	Steinkohlenbergbau	0510
	05.2		Braunkohlenbergbau	
		05.20	Braunkohlenbergbau	0520
06			Gewinnung von Erdöl und Erdgas	
	06.1		Gewinnung von Erdöl	
		06.10	Gewinnung von Erdöl	0610
	06.2		Gewinnung von Erdgas	
		06.20	Gewinnung von Erdgas	0620
07			Erzbergbau	
	07.1		Eisenerzbergbau	
		07.10	Eisenerzbergbau	0710
	07.2		NE-Metallerzbergbau	
		07.21	Bergbau auf Uran- und Thoriumerze	0721
		07.29	Sonstiger NE-Metallerzbergbau	0729
08			Gewinnung von Steinen und Erden, sonstiger Bergbau	
	08.1		Gewinnung von Natursteinen, Kies, Sand, Ton und Kaolin	
		08.11	Gewinnung von Naturwerksteinen und Natursteinen, Kalk- und Gipsstein, Kreide und Schiefer	0810*
		08.12	Gewinnung von Kies, Sand, Ton und Kaolin	0810*
	08.9		Sonstiger Bergbau; Gewinnung von Steinen und Erden a. n. g.	
		08.91	Bergbau auf chemische und Düngemittelminerale	0891
		08.92	Torfgewinnung	0892
		08.93	Gewinnung von Salz	0893
		08.99	Gewinnung von Steinen und Erden a. n. g.	0899
09			Erbringung von Dienstleistungen für den Bergbau und für die Gewinnung von Steinen und Erden	
	09.1		Erbringung von Dienstleistungen für die Gewinnung von Erdöl und Erdgas	
		09.10	Erbringung von Dienstleistungen für die Gewinnung von Erdöl und Erdgas	0910
	09.9		Erbringung von Dienstleistungen für den sonstigen Bergbau und die Gewinnung von Steinen und Erden	
		09.90	Erbringung von Dienstleistungen für den sonstigen Bergbau und die Gewinnung von Steinen und Erden	0990
			ABSCHNITT C — VERARBEITENDES GEWERBE/HERSTELLUNG VON WAREN	
10			Herstellung von Nahrungs- und Futtermitteln	
	10.1		Schlachten und Fleischverarbeitung	
		10.11	Schlachten (ohne Schlachten von Geflügel)	1010*
		10.12	Schlachten von Geflügel	1010*
		10.13	Fleischverarbeitung	1010*
	10.2		Fischverarbeitung	
		10.20	Fischverarbeitung	1020
	10.3		Obst- und Gemüseverarbeitung	
		10.31	Kartoffelverarbeitung	1030*
		10.32	Herstellung von Frucht- und Gemüsesäften	1030*

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a. n. g.: anderweitig nicht genannt *Teil von

Abteilung	Gruppe	Klasse		ISIC Rev. 4
		10.39	Sonstige Verarbeitung von Obst und Gemüse	1030*
	10.4		Herstellung von pflanzlichen und tierischen Ölen und Fetten	
		10.41	Herstellung von Ölen und Fetten (ohne Margarine u. ä. Nahrungsfette)	1040*
		10.42	Herstellung von Margarine u. ä. Nahrungsfetten	1040*
	10.5		Milchverarbeitung	
		10.51	Milchverarbeitung (ohne Herstellung von Speiseeis)	1050*
		10.52	Herstellung von Speiseeis	1050*
	10.6		Mahl- und Schälmühlen, Herstellung von Stärke und Stärkeerzeugnissen	
		10.61	Mahl- und Schälmühlen	1061
		10.62	Herstellung von Stärke und Stärkeerzeugnissen	1062
	10.7		Herstellung von Back- und Teigwaren	
		10.71	Herstellung von Backwaren (ohne Dauerbackwaren)	1071*
		10.72	Herstellung von Dauerbackwaren	1071*
		10.73	Herstellung von Teigwaren	1074
	10.8		Herstellung von sonstigen Nahrungsmitteln	
		10.81	Herstellung von Zucker	1072
		10.82	Herstellung von Süßwaren (ohne Dauerbackwaren)	1073
		10.83	Verarbeitung von Kaffee und Tee, Herstellung von Kaffee-Ersatz	1079*
		10.84	Herstellung von Würzmitteln und Soßen	1079*
		10.85	Herstellung von Fertiggerichten	1075
		10.86	Herstellung von homogenisierten und diätetischen Nahrungsmitteln	1079*
		10.89	Herstellung von sonstigen Nahrungsmitteln a. n. g.	1079*
	10.9		Herstellung von Futtermitteln	
		10.91	Herstellung von Futtermitteln für Nutztiere	1080*
		10.92	Herstellung von Futtermitteln für sonstige Tiere	1080*
11			Getränkeherstellung	
	11.0		Getränkeherstellung	
		11.01	Herstellung von Spirituosen	1101
		11.02	Herstellung von Traubenwein	1102*
		11.03	Herstellung von Apfelwein und anderen Fruchtweinen	1102*
		11.04	Herstellung von Wermutwein und sonstigen aromatisierten Weinen	1102*
		11.05	Herstellung von Bier	1103*
		11.06	Herstellung von Malz	1103*
		11.07	Herstellung von Erfrischungsgetränken; Gewinnung natürlicher Mineralwässer	1104
12			Tabakverarbeitung	
	12.0		Tabakverarbeitung	
		12.00	Tabakverarbeitung	1200
13			Herstellung von Textilien	
	13.1		Spinnstoffaufbereitung und Spinnerei	
		13.10	Spinnstoffaufbereitung und Spinnerei	1311
	13.2		Weberei	
		13.20	Weberei	1312
	13.3		Veredlung von Textilien und Bekleidung	
		13.30	Veredlung von Textilien und Bekleidung	1313
	13.9		Herstellung von sonstigen Textilwaren	
		13.91	Herstellung von gewirktem und gestricktem Stoff	1391
		13.92	Herstellung von konfektionierten Textilwaren (ohne Bekleidung)	1392
		13.93	Herstellung von Teppichen	1393
		13.94	Herstellung von Seilerwaren	1394

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a. n. g.: anderweitig nicht genannt *Teil von

Abteilung	Gruppe	Klasse		ISIC Rev. 4
		13.95	Herstellung von Vliesstoff und Erzeugnissen daraus (ohne Bekleidung)	1399*
		13.96	Herstellung von technischen Textilien	1399*
		13.99	Herstellung von sonstigen Textilwaren a. n. g.	1399*
14			Herstellung von Bekleidung	
	14.1		Herstellung von Bekleidung (ohne Pelzbekleidung)	
		14.11	Herstellung von Lederbekleidung	1410*
		14.12	Herstellung von Arbeits- und Berufsbekleidung	1410*
		14.13	Herstellung von sonstiger Oberbekleidung	1410*
		14.14	Herstellung von Wäsche	1410*
		14.19	Herstellung von sonstiger Bekleidung und Bekleidungszubehör **a. n. g.**	1410*
	14.2		Herstellung von Pelzwaren	
		14.20	Herstellung von Pelzwaren	1420
	14.3		Herstellung von Bekleidung aus gewirktem und gestricktem Stoff	
		14.31	Herstellung von Strumpfwaren	1430*
		14.39	Herstellung von sonstiger Bekleidung aus gewirktem und gestricktem Stoff	1430*
15			Herstellung von Leder, Lederwaren und Schuhen	
	15.1		Herstellung von Leder und Lederwaren (ohne Herstellung von Lederbekleidung)	
		15.11	Herstellung von Leder und Lederfaserstoff; Zurichtung und Färben von Fellen	1511
		15.12	Lederverarbeitung (ohne Herstellung von Lederbekleidung)	1512
	15.2		Herstellung von Schuhen	
		15.20	Herstellung von Schuhen	1520
16			Herstellung von Holz-, Flecht-, Korb- und Korkwaren (ohne Möbel)	
	16.1		Säge-, Hobel- und Holzimprägnierwerke	
		16.10	Säge-, Hobel- und Holzimprägnierwerke	1610
	16.2		Herstellung von sonstigen Holz-, Kork-, Flecht- und Korbwaren (ohne Möbel)	
		16.21	Herstellung von Furnier-, Sperrholz-, Holzfaser- und Holzspanplatten	1621
		16.22	Herstellung von Parketttafeln	1622*
		16.23	Herstellung von sonstigen Konstruktionsteilen, Fertigbauteilen, Ausbauelementen und Fertigteilbauten aus Holz	1622*
		16.24	Herstellung von Verpackungsmitteln, Lagerbehältern und Ladungsträgern aus Holz	1623
		16.29	Herstellung von Holzwaren a.n.g, Kork-, Flecht- und Korbwaren (ohne Möbel)	1629
17			Herstellung von Papier, Pappe und Waren daraus	
	17.1		Herstellung von Holz- und Zellstoff, Papier, Karton und Pappe	
		17.11	Herstellung von Holz- und Zellstoff	1701*
		17.12	Herstellung von Papier, Karton und Pappe	1701*
	17.2		Herstellung von Waren aus Papier, Karton und Pappe	
		17.21	Herstellung von Wellpapier und -pappe sowie von Verpackungsmitteln aus Papier, Karton und Pappe	1702
		17.22	Herstellung von Haushalts-, Hygiene- und Toilettenartikeln aus Zellstoff, Papier und Pappe	1709*
		17.23	Herstellung von Schreibwaren und Bürobedarf aus Papier, Karton und Pappe	1709*
		17.24	Herstellung von Tapeten	1709*
		17.29	Herstellung von sonstigen Waren aus Papier, Karton und Pappe	1709*
18			Herstellung von Druckerzeugnissen; Vervielfältigung von bespielten Ton-, Bild- und Datenträgern	
	18.1		Herstellung von Druckerzeugnissen	
		18.11	Drucken von Zeitungen	1811*
		18.12	Drucken a. n. g.	1811*
		18.13	Druck- und Medienvorstufe	1812*
		18.14	Binden von Druckerzeugnissen und damit verbundene Dienstleistungen	1812*
	18.2		Vervielfältigung von bespielten Ton-, Bild- und Datenträgern	
		18.20	Vervielfältigung von bespielten Ton-, Bild- und Datenträgern	1820

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
19			Kokerei und Mineralölverarbeitung	
	19.1		Kokerei	
		19.10	Kokerei	1910
	19.2		Mineralölverarbeitung	
		19.20	Mineralölverarbeitung	1920
20			Herstellung von chemischen Erzeugnissen	
	20.1		Herstellung von chemischen Grundstoffen, Düngemitteln und Stickstoffverbindungen, Kunststoffen in Primärformen und synthetischem Kautschuk in Primärformen	
		20.11	Herstellung von Industriegasen	2011*
		20.12	Herstellung von Farbstoffen und Pigmenten	2011*
		20.13	Herstellung von sonstigen anorganischen Grundstoffen und Chemikalien	2011*
		20.14	Herstellung von sonstigen organischen Grundstoffen und Chemikalien	2011*
		20.15	Herstellung von Düngemitteln und Stickstoffverbindungen	2012
		20.16	Herstellung von Kunststoffen in Primärformen	2013*
		20.17	Herstellung von synthetischem Kautschuk in Primärformen	2013*
	20.2		Herstellung von Schädlingsbekämpfungs-, Pflanzenschutz- und Desinfektionsmitteln	
		20.20	Herstellung von Schädlingsbekämpfungs-, Pflanzenschutz- und Desinfektionsmitteln	2021
	20.3		Herstellung von Anstrichmitteln, Druckfarben und Kitten	
		20.30	Herstellung von Anstrichmitteln, Druckfarben und Kitten	2022
	20.4		Herstellung von Seifen, Wasch-, Reinigungs- und Körperpflegemitteln sowie von Duftstoffen	
		20.41	Herstellung von Seifen, Wasch-, Reinigungs- und Poliermitteln	2023*
		20.42	Herstellung von Körperpflegemitteln und Duftstoffen	2023*
	20.5		Herstellung von sonstigen chemischen Erzeugnissen	
		20.51	Herstellung von pyrotechnischen Erzeugnissen	2029*
		20.52	Herstellung von Klebstoffen	2029*
		20.53	Herstellung von etherischen Ölen	2029*
		20.59	Herstellung von sonstigen chemischen Erzeugnissen a. n. g.	2029*
	20.6		Herstellung von Chemiefasern	
		20.60	Herstellung von Chemiefasern	2030
21			Herstellung von pharmazeutischen Erzeugnissen	
	21.1		Herstellung von pharmazeutischen Grundstoffen	
		21.10	Herstellung von pharmazeutischen Grundstoffen	2100*
	21.2		Herstellung von pharmazeutischen Spezialitäten und sonstigen pharmazeutischen Erzeugnissen	
		21.20	Herstellung von pharmazeutischen Spezialitäten und sonstigen pharmazeutischen Erzeugnissen	2100*
22			Herstellung von Gummi- und Kunststoffwaren	
	22.1		Herstellung von Gummiwaren	
		22.11	Herstellung und Runderneuerung von Bereifungen	2211
		22.19	Herstellung von sonstigen Gummiwaren	2219
	22.2		Herstellung von Kunststoffwaren	
		22.21	Herstellung von Platten, Folien, Schläuchen und Profilen aus Kunststoffen	2220*
		22.22	Herstellung von Verpackungsmitteln aus Kunststoffen	2220*
		22.23	Herstellung von Baubedarfsartikeln aus Kunststoffen	2220*
		22.29	Herstellung von sonstigen Kunststoffwaren	2220*
23			Herstellung von Glas und Glaswaren, Keramik, Verarbeitung von Steinen und Erden	
	23.1		Herstellung von Glas und Glaswaren	
		23.11	Herstellung von Flachglas	2310*
		23.12	Veredlung und Bearbeitung von Flachglas	2310*
		23.13	Herstellung von Hohlglas	2310*
		23.14	Herstellung von Glasfasern und Waren daraus	2310*
		23.19	Herstellung, Veredlung und Bearbeitung von sonstigem Glas einschließlich technischen Glaswaren	2310*

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	23.2		Herstellung von feuerfesten keramischen Werkstoffen und Waren	
		23.20	Herstellung von feuerfesten keramischen Werkstoffen und Waren	2391
	23.3		Herstellung von keramischen Baumaterialien	
		23.31	Herstellung von keramischen Wand- und Bodenfliesen und -platten	2392*
		23.32	Herstellung von Ziegeln und sonstiger Baukeramik	2392*
	23.4		Herstellung von sonstigen Porzellan- und keramischen Erzeugnissen	
		23.41	Herstellung von keramischen Haushaltswaren und Ziergegenständen	2393*
		23.42	Herstellung von Sanitärkeramik	2393*
		23.43	Herstellung von Isolatoren und Isolierteilen aus Keramik	2393*
		23.44	Herstellung von keramischen Erzeugnissen für sonstige technische Zwecke	2393*
		23.49	Herstellung von sonstigen keramischen Erzeugnissen	2393*
	23.5		Herstellung von Zement, Kalk und gebranntem Gips	
		23.51	Herstellung von Zement	2394*
		23.52	Herstellung von Kalk und gebranntem Gips	2394*
	23.6		Herstellung von Erzeugnissen aus Beton, Zement und Gips	
		23.61	Herstellung von Erzeugnissen aus Beton, Zement und Kalksandstein für den Bau	2395*
		23.62	Herstellung von Gipserzeugnissen für den Bau	2395*
		23.63	Herstellung von Frischbeton (Transportbeton)	2395*
		23.64	Herstellung von Mörtel und anderem Beton (Trockenbeton)	2395*
		23.65	Herstellung von Faserzementwaren	2395*
		23.69	Herstellung von sonstigen Erzeugnissen aus Beton, Zement und Gips a. n. g.	2395*
	23.7		Be- und Verarbeitung von Naturwerksteinen und Natursteinen a. n. g.	
		23.70	Be- und Verarbeitung von Naturwerksteinen und Natursteinen a. n. g.	2396
	23.9		Herstellung von Schleifkörpern und Schleifmitteln auf Unterlage sowie sonstigen Erzeugnissen aus nichtmetallischen Mineralien a. n. g.	
		23.91	Herstellung von Schleifkörpern und Schleifmitteln auf Unterlage	2399*
		23.99	Herstellung von sonstigen Erzeugnissen aus nichtmetallischen Mineralien a. n. g.	2399*
24			Metallerzeugung und -bearbeitung	
	24.1		Erzeugung von Roheisen, Stahl und Ferrolegierungen	
		24.10	Erzeugung von Roheisen, Stahl und Ferrolegierungen	2410*
	24.2		Herstellung von Stahlrohren, Rohrform-, Rohrverschluss- und Rohrverbindungsstücken aus Stahl	
		24.20	Herstellung von Stahlrohren, Rohrform-, Rohrverschluss- und Rohrverbindungsstücken aus Stahl	2410*
	24.3		Sonstige erste Bearbeitung von Eisen und Stahl	
		24.31	Herstellung von Blankstahl	2410*
		24.32	Herstellung von Kaltband mit einer Breite von weniger als 600 mm	2410*
		24.33	Herstellung von Kaltprofilen	2410*
		24.34	Herstellung von kaltgezogenem Draht	2410*
	24.4		Erzeugung und erste Bearbeitung von NE-Metallen	
		24.41	Erzeugung und erste Bearbeitung von Edelmetallen	2420*
		24.42	Erzeugung und erste Bearbeitung von Aluminium	2420*
		24.43	Erzeugung und erste Bearbeitung von Blei, Zink und Zinn	2420*
		24.44	Erzeugung und erste Bearbeitung von Kupfer	2420*
		24.45	Erzeugung und erste Bearbeitung von sonstigen NE-Metallen	2420*
		24.46	Aufbereitung von Kernbrennstoffen	2420*
	24.5		Gießereien	
		24.51	Eisengießereien	2431*
		24.52	Stahlgießereien	2431*
		24.53	Leichtmetallgießereien	2432*
		24.54	Buntmetallgießereien	2432*

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
25			Herstellung von Metallerzeugnissen	
	25.1		Stahl- und Leichtmetallbau	
		25.11	Herstellung von Metallkonstruktionen	2511*
		25.12	Herstellung von Ausbauelementen aus Metall	2511*
	25.2		Herstellung von Metalltanks und -behältern; Herstellung von Heizkörpern und -kesseln für Zentralheizungen	
		25.21	Herstellung von Heizkörpern und –kesseln für Zentralheizungen	2512*
		25.29	Herstellung von Sammelbehältern, Tanks u. ä. Behältern aus Metall	2512*
	25.3		Herstellung von Dampfkesseln (ohne Zentralheizungskessel)	
		25.30	Herstellung von Dampfkesseln (ohne Zentralheizungskessel)	2513
	25.4		Herstellung von Waffen und Munition	
		25.40	Herstellung von Waffen und Munition	2520
	25.5		Herstellung von Schmiede-, Press-, Zieh- und Stanzteilen, gewalzten Ringen und pulvermetallurgischen Erzeugnissen	
		25.50	Herstellung von Schmiede-, Press-, Zieh- und Stanzteilen, gewalzten Ringen und pulvermetallurgischen Erzeugnissen	2591
	25.6		Oberflächenveredlung und Wärmebehandlung; Mechanik a. n. g.	
		25.61	Oberflächenveredlung und Wärmebehandlung	2592*
		25.62	Mechanik a. n. g.	2592*
	25.7		Herstellung von Schneidwaren, Werkzeugen, Schlössern und Beschlägen aus unedlen Metallen	
		25.71	Herstellung von Schneidwaren und Bestecken aus unedlen Metallen	2593*
		25.72	Herstellung von Schlössern und Beschlägen aus unedlen Metallen	2593*
		25.73	Herstellung von Werkzeugen	2593*
	25.9		Herstellung von sonstigen Metallwaren	
		25.91	Herstellung von Fässern, Trommeln, Dosen, Eimern u. ä. Behältern aus Metall	2599*
		25.92	Herstellung von Verpackungen und Verschlüssen aus Eisen, Stahl und NE-Metall	2599*
		25.93	Herstellung von Drahtwaren, Ketten und Federn	2599*
		25.94	Herstellung von Schrauben und Nieten	2599*
		25.99	Herstellung von sonstigen Metallwaren a. n. g.	2599*
26			Herstellung von Datenverarbeitungsgeräten, elektronischen und optischen Erzeugnissen	
	26.1		Herstellung von elektronischen Bauelementen und Leiterplatten	
		26.11	Herstellung von elektronischen Bauelementen	2610*
		26.12	Herstellung von bestückten Leiterplatten	2610*
	26.2		Herstellung von Datenverarbeitungsgeräten und peripheren Geräten	
		26.20	Herstellung von Datenverarbeitungsgeräten und peripheren Geräten	2620
	26.3		Herstellung von Geräten und Einrichtungen der Telekommunikationstechnik	
		26.30	Herstellung von Geräten und Einrichtungen der Telekommunikationstechnik	2630
	26.4		Herstellung von Geräten der Unterhaltungselektronik	
		26.40	Herstellung von Geräten der Unterhaltungselektronik	2640
	26.5		Herstellung von Mess-, Kontroll-, Navigations- u. ä. Instrumenten und Vorrichtungen; Herstellung von Uhren	
		26.51	Herstellung von Mess-, Kontroll-, Navigations- u. ä. Instrumenten und Vorrichtungen	2651
		26.52	Herstellung von Uhren	2652
	26.6		Herstellung von Bestrahlungs- und Elektrotherapiegeräten und elektromedizinischen Geräten	
		26.60	Herstellung von Bestrahlungs- und Elektrotherapiegeräten und elektromedizinischen Geräten	2660
	26.7		Herstellung von optischen und fotografischen Instrumenten und Geräten	
		26.70	Herstellung von optischen und fotografischen Instrumenten und Geräten	2670

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
	26.8		Herstellung von magnetischen und optischen Datenträgern	
		26.80	Herstellung von magnetischen und optischen Datenträgern	2680
27			Herstellung von elektrischen Ausrüstungen	
	27.1		Herstellung von Elektromotoren, Generatoren, Transformatoren, Elektrizitätsverteilungs- und -schalteinrichtungen	
		27.11	Herstellung von Elektromotoren, Generatoren und Transformatoren	2710*
		27.12	Herstellung von Elektrizitätsverteilungs- und -schalteinrichtungen	2710*
	27.2		Herstellung von Batterien und Akkumulatoren	
		27.20	Herstellung von Batterien und Akkumulatoren	2720
	27.3		Herstellung von Kabeln und elektrischem Installationsmaterial	
		27.31	Herstellung von Glasfaserkabeln	2731
		27.32	Herstellung von sonstigen elektronischen und elektrischen Drähten und Kabeln	2732
		27.33	Herstellung von elektrischem Installationsmaterial	2733
	27.4		Herstellung von elektrischen Lampen und Leuchten	
		27.40	Herstellung von elektrischen Lampen und Leuchten	2740
	27.5		Herstellung von Haushaltsgeräten	
		27.51	Herstellung von elektrischen Haushaltsgeräten	2750*
		27.52	Herstellung von nichtelektrischen Haushaltsgeräten	2750*
	27.9		Herstellung von sonstigen elektrischen Ausrüstungen und Geräten a. n. g.	
		27.90	Herstellung von sonstigen elektrischen Ausrüstungen und Geräten a. n. g.	2790
28			Maschinenbau	
	28.1		Herstellung von nicht wirtschaftszweigspezifischen Maschinen	
		28.11	Herstellung von Verbrennungsmotoren und Turbinen (ohne Motoren für Luft- und Straßenfahrzeuge)	2811
		28.12	Herstellung von hydraulischen und pneumatischen Komponenten und Systemen	2812
		28.13	Herstellung von Pumpen und Kompressoren a. n. g.	2813*
		28.14	Herstellung von Armaturen a. n. g	2813*
		28.15	Herstellung von Lagern, Getrieben, Zahnrädern und Antriebselementen	2814
	28.2		Herstellung von sonstigen nicht wirtschaftszweigspezifischen Maschinen	
		28.21	Herstellung von Öfen und Brennern	2815
		28.22	Herstellung von Hebezeugen und Fördermitteln	2816
		28.23	Herstellung von Büromaschinen (ohne Datenverarbeitungsgeräte und periphere Geräte)	2817
		28.24	Herstellung von handgeführten Werkzeugen mit Motorantrieb	2818
		28.25	Herstellung von kälte- und lufttechnischen Erzeugnissen, nicht für den Haushalt	2819*
		28.29	Herstellung von sonstigen nicht wirtschaftszweigspezifischen Maschinen a. n. g.	2819*
	28.3		Herstellung von land- und forstwirtschaftlichen Maschinen	
		28.30	Herstellung von land- und forstwirtschaftlichen Maschinen	2821
	28.4		Herstellung von Werkzeugmaschinen	
		28.41	Herstellung von Werkzeugmaschinen für die Metallbearbeitung	2822*
		28.49	Herstellung von sonstigen Werkzeugmaschinen	2822*
	28.9		Herstellung von Maschinen für sonstige bestimmte Wirtschaftszweige	
		28.91	Herstellung von Maschinen für die Metallerzeugung, von Walzwerkseinrichtungen und Gießmaschinen	2823
		28.92	Herstellung von Bergwerks-, Bau- und Baustoffmaschinen	2824
		28.93	Herstellung von Maschinen für die Nahrungs- und Genussmittelerzeugung und die Tabakverarbeitung	2825
		28.94	Herstellung von Maschinen für die Textil- und Bekleidungsherstellung und die Lederverarbeitung	2826
		28.95	Herstellung von Maschinen für die Papiererzeugung und –verarbeitung	2829*

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		28.96	Herstellung von Maschinen für die Verarbeitung von Kunststoffen und Kautschuk	2829*
		28.99	Herstellung von Maschinen für sonstige bestimmte Wirtschaftszweige a. n. g.	2829*
29			Herstellung von Kraftwagen und Kraftwagenteilen	
	29.1		Herstellung von Kraftwagen und Kraftwagenmotoren	
		29.10	Herstellung von Kraftwagen und Kraftwagenmotoren	2910
	29.2		Herstellung von Karosserien, Aufbauten und Anhängern	
		29.20	Herstellung von Karosserien, Aufbauten und Anhängern	2920
	29.3		Herstellung von Teilen und Zubehör für Kraftwagen	
		29.31	Herstellung elektrischer und elektronischer Ausrüstungsgegenstände für Kraftwagen	2930*
		29.32	Herstellung von sonstigen Teilen und sonstigem Zubehör für Kraftwagen	2930*
30			Sonstiger Fahrzeugbau	
	30.1		Schiff- und Bootsbau	
		30.11	Schiffbau (ohne Boots- und Yachtbau)	3011
		30.12	Boots- und Yachtbau	3012
	30.2		Schienenfahrzeugbau	
		30.20	Schienenfahrzeugbau	3020
	30.3		Luft- und Raumfahrzeugbau	
		30.30	Luft- und Raumfahrzeugbau	3030
	30.4		Herstellung von militärischen Kampffahrzeugen	
		30.40	Herstellung von militärischen Kampffahrzeugen	3040
	30.9		Herstellung von Fahrzeugen a. n. g.	
		30.91	Herstellung von Krafträdern	3091
		30.92	Herstellung von Fahrrädern sowie von Behindertenfahrzeugen	3092
		30.99	Herstellung von sonstigen Fahrzeugen a. n. g.	3099
31			Herstellung von Möbeln	
	31.0		Herstellung von Möbeln	
		31.01	Herstellung von Büro- und Ladenmöbeln	3100*
		31.02	Herstellung von Küchenmöbeln	3100*
		31.03	Herstellung von Matratzen	3100*
		31.09	Herstellung von sonstigen Möbeln	3100*
32			Herstellung von sonstigen Waren	
	32.1		Herstellung von Münzen, Schmuck und ähnlichen Erzeugnissen	
		32.11	Herstellung von Münzen	3211*
		32.12	Herstellung von Schmuck, Gold- und Silberschmiedewaren (ohne Fantasieschmuck)	3211*
		32.13	Herstellung von Fantasieschmuck	3212
	32.2		Herstellung von Musikinstrumenten	
		32.20	Herstellung von Musikinstrumenten	3220
	32.3		Herstellung von Sportgeräten	
		32.30	Herstellung von Sportgeräten	3230
	32.4		Herstellung von Spielwaren	
		32.40	Herstellung von Spielwaren	3240
	32.5		Herstellung von medizinischen und zahnmedizinischen Apparaten und Materialien	
		32.50	Herstellung von medizinischen und zahnmedizinischen Apparaten und Materialien	3250
	32.9		Herstellung von Erzeugnissen a. n. g.	
		32.91	Herstellung von Besen und Bürsten	3290*
		32.99	Herstellung von sonstigen Erzeugnissen a. n. g.	3290*

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
33			Reparatur und Installation von Maschinen und Ausrüstungen	
	33.1		Reparatur von Metallerzeugnissen, Maschinen und Ausrüstungen	
		33.11	Reparatur von Metallerzeugnissen	3311
		33.12	Reparatur von Maschinen	3312
		33.13	Reparatur von elektronischen und optischen Geräten	3313
		33.14	Reparatur von elektrischen Ausrüstungen	3314
		33.15	Reparatur und Instandhaltung von Schiffen, Booten und Yachten	3315*
		33.16	Reparatur und Instandhaltung von Luft- und Raumfahrzeugen	3315*
		33.17	Reparatur und Instandhaltung von Fahrzeugen a. n. g.	3315*
		33.19	Reparatur von sonstigen Ausrüstungen	3319
	33.2		Installation von Maschinen und –Ausrüstungen a. n. g.	
		33.20	Installation von Maschinen und –Ausrüstungen a. n. g.	3320
			ABSCHNITT D — ENERGIEVERSORGUNG	
35			Energieversorgung	
	35.1		Elektrizitätsversorgung	
		35.11	Elektrizitätserzeugung	3510*
		35.12	Elektrizitätsübertragung	3510*
		35.13	Elektrizitätsverteilung	3510*
		35.14	Elektrizitätshandel	3510*
	35.2		Gasversorgung	
		35.21	Gaserzeugung	3520*
		35.22	Gasverteilung durch Rohrleitungen	3520*
		35.23	Gashandel durch Rohrleitungen	3520*
	35.3		Wärme- und Kälteversorgung	
		35.30	Wärme- und Kälteversorgung	3530
			ABSCHNITT E — WASSERVERSORGUNG; ABWASSER- UND ABFALLENTSORGUNG UND BESEITIGUNG VON UMWELTVERSCHMUTZUNGEN	
36			Wasserversorgung	
	36.0		Wasserversorgung	
		36.00	Wasserversorgung	3600
37			Abwasserentsorgung	
	37.0		Abwasserentsorgung	
		37.00	Abwasserentsorgung	3700
38			Sammlung, Behandlung und Beseitigung von Abfällen; Rückgewinnung	
	38.1		Sammlung von Abfällen	
		38.11	Sammlung nicht gefährlicher Abfälle	3811
		38.12	Sammlung gefährlicher Abfälle	3812
	38.2		Abfallbehandlung und Beseitigung	
		38.21	Behandlung und Beseitigung nicht gefährlicher Abfälle	3821
		38.22	Behandlung und Beseitigung gefährlicher Abfälle	3822
	38.3		Rückgewinnung	
		38.31	Zerlegen von Schiffs- und Fahrzeugwracks und anderen Altwaren	3830*
		38.32	Rückgewinnung sortierter Werkstoffe	3830*
39			Beseitigung von Umweltverschmutzungen und sonstige Entsorgung	
	39.0		Beseitigung von Umweltverschmutzungen und sonstige Entsorgung	
		39.00	Beseitigung von Umweltverschmutzungen und sonstige Entsorgung	3900
			ABSCHNITT F — BAUGEWERBE/BAU	
41			Hochbau	
	41.1		Erschließung von Grundstücken; Bauträger	
		41.10	Erschließung von Grundstücken; Bauträger	4100*
	41.2		Bau von Gebäuden	
		41.20	Bau von Gebäuden	4100*

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42			Tiefbau	
	42.1		Bau von Straßen und Bahnverkehrsstrecken	
		42.11	Bau von Straßen	4210*
		42.12	Bau von Bahnverkehrsstrecken	4210*
		42.13	Brücken- und Tunnelbau	4210*
	42.2		Leitungstiefbau und Kläranlagenbau	
		42.21	Rohrleitungstiefbau, Brunnenbau und Kläranlagenbau	4220*
		42.22	Kabelnetzleitungstiefbau	4220*
	42.9		Sonstiger Tiefbau	
		42.91	Wasserbau	4290*
		42.99	Sonstiger Tiefbau a. n. g.	4290*
43			Vorbereitende Baustellenarbeiten, Bauinstallation und sonstiges Ausbaugewerbe	
	43.1		Abbrucharbeiten und vorbereitende Baustellenarbeiten	
		43.11	Abbrucharbeiten	4311
		43.12	Vorbereitende Baustellenarbeiten	4312*
		43.13	Test- und Suchbohrung	4312*
	43.2		Bauinstallation	
		43.21	Elektroinstallation	4321
		43.22	Gas-, Wasser-, Heizungs- sowie Lüftungs- und Klimainstallation	4322
		43.29	Sonstige Bauinstallation	4329
	43.3		Sonstiger Ausbau	
		43.31	Anbringen von Stuckaturen, Gipserei und Verputzerei	4330*
		43.32	Bautischlerei und -schlosserei	4330*
		43.33	Fußboden-, Fliesen- und Plattenlegerei, Tapeziererei	4330*
		43.34	Malerei und Glaserei	4330*
		43.39	Sonstiger Ausbau a. n. g.	4330*
	43.9		Sonstige spezialisierte Bautätigkeiten	
		43.91	Dachdeckerei und Zimmerei	4390*
		43.99	Sonstige spezialisierte Bautätigkeiten a. n. g.	4390*
			ABSCHNITT G — HANDEL; INSTANDHALTUNG UND REPARATUR VON KRAFTFAHRZEUGEN	
45			Handel mit Kraftfahrzeugen; Instandhaltung und Reparatur von Kraftfahrzeugen	
	45.1		Handel mit Kraftwagen	
		45.11	Handel mit Kraftwagen mit einem Gesamtgewicht von 3,5 t oder weniger	4510*
		45.19	Handel mit Kraftwagen mit einem Gesamtgewicht von mehr als 3,5 t	4510*
	45.2		Instandhaltung und Reparatur von Kraftwagen	
		45.20	Instandhaltung und Reparatur von Kraftwagen	4520
	45.3		Handel mit Kraftwagenteilen und -zubehör	
		45.31	Großhandel mit Kraftwagenteilen und -zubehör	4530*
		45.32	Einzelhandel mit Kraftwagenteilen und -zubehör	4530*
	45.4		Handel mit Krafträdern, Kraftradteilen und -zubehör; Instandhaltung und Reparatur von Krafträdern	
		45.40	Handel mit Krafträdern, Kraftradteilen und -zubehör; Instandhaltung und Reparatur von Krafträdern	4540
46			Großhandel (ohne Handel mit Kraftfahrzeugen und Krafträdern)	
	46.1		Handelsvermittlung	
		46.11	Handelsvermittlung von landwirtschaftlichen Grundstoffen, lebenden Tieren, textilen Rohstoffen und Halbwaren	4610*
		46.12	Handelsvermittlung von Brennstoffen, Erzen, Metallen und technischen Chemikalien	4610*
		46.13	Handelsvermittlung von Holz, Baustoffen und Anstrichmitteln	4610*
		46.14	Handelsvermittlung von Maschinen, technischem Bedarf, Wasser- und Luftfahrzeugen	4610*
		46.15	Handelsvermittlung von Möbeln, Einrichtungs- und Haushaltsgegenständen, Eisen- und Metallwaren	4610*

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		46.16	Handelsvermittlung von Textilien, Bekleidung, Schuhen und Lederwaren	4610*
		46.17	Handelsvermittlung von Nahrungsmitteln, Getränken und Tabakwaren	4610*
		46.18	Handelsvermittlung von sonstigen Waren	4610*
		46.19	Handelsvermittlung von Waren ohne ausgeprägten Schwerpunkt	4610*
	46.2		Großhandel mit landwirtschaftlichen Grundstoffen und lebenden Tieren	
		46.21	Großhandel mit Getreide, Rohtabak, Saatgut und Futtermitteln	4620*
		46.22	Großhandel mit Blumen und Pflanzen	4620*
		46.23	Großhandel mit lebenden Tieren	4620*
		46.24	Großhandel mit Häuten, Fellen und Leder	4620*
	46.3		Großhandel mit Nahrungs- und Genussmitteln, Getränken und Tabakwaren	
		46.31	Großhandel mit Obst, Gemüse und Kartoffeln	4630*
		46.32	Großhandel mit Fleisch und Fleischwaren	4630*
		46.33	Großhandel mit Milch, Milcherzeugnissen, Eiern, Speiseölen und Nahrungsfetten	4630*
		46.34	Großhandel mit Getränken	4630*
		46.35	Großhandel mit Tabakwaren	4630*
		46.36	Großhandel mit Zucker, Süßwaren und Backwaren	4630*
		46.37	Großhandel mit Kaffee, Tee, Kakao und Gewürzen	4630*
		46.38	Großhandel mit sonstigen Nahrungs- und Genussmitteln	4630*
		46.39	Großhandel mit Nahrungs- und Genussmitteln, Getränken und Tabakwaren, ohne ausgeprägten Schwerpunkt	4630*
	46.4		Großhandel mit Gebrauchs- und Verbrauchsgütern	
		46.41	Großhandel mit Textilien	4641*
		46.42	Großhandel mit Bekleidung und Schuhen	4641*
		46.43	Großhandel mit Foto- und optischen Erzeugnissen, elektrischen Haushaltsgeräten und Geräten der Unterhaltungselektronik	4649*
		46.44	Großhandel mit keramischen Erzeugnissen, Glaswaren und Reinigungsmitteln	4649*
		46.45	Großhandel mit kosmetischen Erzeugnissen und Körperpflegemitteln	4649*
		46.46	Großhandel mit pharmazeutischen, medizinischen und orthopädischen Erzeugnissen	4649*
		46.47	Großhandel mit Möbeln, Teppichen, Lampen und Leuchten	4649*
		46.48	Großhandel mit Uhren und Schmuck	4649*
		46.49	Großhandel mit sonstigen Gebrauchs- und Verbrauchsgütern	4649*
	46.5		Großhandel mit Geräten der Informations- und Kommunikationstechnik	
		46.51	Großhandel mit Datenverarbeitungsgeräten, peripheren Geräten und Software	4651
		46.52	Großhandel mit elektronischen Bauteilen und Telekommunikationsgeräten	4652
	46.6		Großhandel mit sonstigen Maschinen, Ausrüstungen und Zubehör	
		46.61	Großhandel mit landwirtschaftlichen Maschinen, und Geräten	4653
		46.62	Großhandel mit Werkzeugmaschinen	4659*
		46.63	Großhandel mit Bergwerks-, Bau- und Baustoffmaschinen	4659*
		46.64	Großhandel mit Textil-, Näh- und Strickmaschinen	4659*
		46.65	Großhandel mit Büromöbeln	4659*
		46.66	Großhandel mit sonstigen Büromaschinen und –einrichtungen	4659*
		46.69	Großhandel mit sonstigen Maschinen und Ausrüstungen	4659*
	46.7		Sonstiger Großhandel	
		46.71	Großhandel mit festen Brennstoffen und Mineralölerzeugnissen	4661
		46.72	Großhandel mit Erzen, Metallen und Metallhalbzeug	4662
		46.73	Großhandel mit Holz, Baustoffen, Anstrichmitteln und Sanitärkeramik	4663*
		46.74	Großhandel mit Metall- und Kunststoffwaren für Bauzwecke sowie Installationsbedarf für Gas, Wasser und Heizung	4663*
		46.75	Großhandel mit chemischen Erzeugnissen	4669*
		46.76	Großhandel mit sonstigen Halbwaren	4669*
		46.77	Großhandel mit Altmaterialien und Reststoffen	4669*

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	46.9		Großhandel ohne ausgeprägten Schwerpunkt	
		46.90	Großhandel ohne ausgeprägten Schwerpunkt	4690
47			Einzelhandel (ohne Handel mit Kraftfahrzeugen)	
	47.1		Einzelhandel mit Waren verschiedener Art (in Verkaufsräumen)	
		47.11	Einzelhandel mit Waren verschiedener Art, Hauptrichtung Nahrungs- und Genussmittel, Getränke und Tabakwaren	4711
		47.19	Sonstiger Einzelhandel mit Waren verschiedener Art	4719
	47.2		Einzelhandel mit Nahrungs- und Genussmitteln, Getränken und Tabakwaren (in Verkaufsräumen)	
		47.21	Einzelhandel mit Obst, Gemüse und Kartoffeln	4721*
		47.22	Einzelhandel mit Fleisch und Fleischwaren	4721*
		47.23	Einzelhandel mit Fisch, Meeresfrüchten und Fischerzeugnissen	4721*
		47.24	Einzelhandel mit Back- und Süßwaren	4721*
		47.25	Einzelhandel mit Getränken	4722
		47.26	Einzelhandel mit Tabakwaren	4723
		47.29	Sonstiger Einzelhandel mit Nahrungs- und Genussmitteln	4721*
	47.3		Einzelhandel mit Motorenkraftstoffen (Tankstellen)	
		47.30	Einzelhandel mit Motorenkraftstoffen (Tankstellen)	4730
	47.4		Einzelhandel mit Geräten der Informations- und Kommunikationstechnik (in Verkaufsräumen)	
		47.41	Einzelhandel mit Datenverarbeitungsgeräten, peripheren Geräten und Software	4741*
		47.42	Einzelhandel mit Telekommunikationsgeräten	4741*
		47.43	Einzelhandel mit Geräten der Unterhaltungselektronik	4742
	47.5		Einzelhandel mit sonstigen Haushaltsgeräten, Textilien, Heimwerker- und Einrichtungsbedarf (in Verkaufsräumen)	
		47.51	Einzelhandel mit Textilien	4751
		47.52	Einzelhandel mit Metallwaren, Anstrichmitteln, Bau- und Heimwerkerbedarf	4752
		47.53	Einzelhandel mit Vorhängen, Teppichen, Fußbodenbelägen und Tapeten	4753
		47.54	Einzelhandel mit elektrischen Haushaltsgeräten	4759*
		47.59	Einzelhandel mit Möbeln, Einrichtungsgegenständen und sonstigem Hausrat	4759*
	47.6		Einzelhandel mit Verlagsprodukten, Sportausrüstungen und Spielwaren (in Verkaufsräumen)	
		47.61	Einzelhandel mit Büchern	4761*
		47.62	Einzelhandel mit Zeitschriften, Zeitungen, Schreibwaren und Bürobedarf	4761*
		47.63	Einzelhandel mit bespielten Ton- und Bildträgern	4762
		47.64	Einzelhandel mit Fahrrädern, Sport- und Campingartikeln	4763
		47.65	Einzelhandel mit Spielwaren	4764
	47.7		Einzelhandel mit sonstigen Gütern (in Verkaufsräumen)	
		47.71	Einzelhandel mit Bekleidung	4771*
		47.72	Einzelhandel mit Schuhen und Lederwaren	4771*
		47.73	Apotheken	4772*
		47.74	Einzelhandel mit medizinischen und orthopädischen Artikeln	4772*
		47.75	Einzelhandel mit kosmetischen Erzeugnissen und Körperpflegemitteln	4772*
		47.76	Einzelhandel mit Blumen, Pflanzen, Sämereien, Düngemitteln, zoologischem Bedarf und lebenden Tieren	4773*
		47.77	Einzelhandel mit Uhren und Schmuck	4773*
		47.78	Sonstiger Einzelhandel in Verkaufsräumen (ohne Antiquitäten und Gebrauchtwaren)	4773*
		47.79	Einzelhandel mit Antiquitäten und Gebrauchtwaren	4774
	47.8		Einzelhandel an Verkaufsständen und auf Märkten	
		47.81	Einzelhandel mit Nahrungs- und Genussmitteln, Getränken und Tabakwaren an Verkaufsständen und auf Märkten	4781

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		47.82	Einzelhandel mit Textilien, Bekleidung und Schuhen an Verkaufsständen und auf Märkten	4782
		47.89	Einzelhandel mit sonstigen Gütern an Verkaufsständen und auf Märkten	4789
	47.9		Einzelhandel, nicht in Verkaufsräumen, an Verkaufsständen oder auf Märkten	
		47.91	Versand- und Internet-Einzelhandel	4791
		47.99	Sonstiger Einzelhandel, nicht in Verkaufsräumen, an Verkaufsständen oder auf Märkten	4799
			ABSCHNITT H — VERKEHR UND LAGEREI	
49			Landverkehr und Transport in Rohrfernleitungen	
	49.1		Personenbeförderung im Eisenbahnfernverkehr	
		49.10	Personenbeförderung im Eisenbahnfernverkehr	4911
	49.2		Güterbeförderung im Eisenbahnverkehr	
		49.20	Güterbeförderung im Eisenbahnverkehr	4912
	49.3		Sonstige Personenbeförderung im Landverkehr	
		49.31	Personenbeförderung im Nahverkehr zu Lande (ohne Taxis)	4921
		49.32	Betrieb von Taxis	4922*
		49.39	Sonstige Personenbeförderung im Landverkehr a. n. g.	4922*
	49.4		Güterbeförderung im Straßenverkehr, Umzugstransporte	
		49.41	Güterbeförderung im Straßenverkehr	4923*
		49.42	Umzugstransporte	4923*
	49.5		Transport in Rohrfernleitungen	
		49.50	Transport in Rohrfernleitungen	4930
50			Schifffahrt	
	50.1		Personenbeförderung in der See- und Küstenschifffahrt	
		50.10	Personenbeförderung in der See- und Küstenschifffahrt	5011
	50.2		Güterbeförderung in der See- und Küstenschifffahrt	
		50.20	Güterbeförderung in der See- und Küstenschifffahrt	5012
	50.3		Personenbeförderung in der Binnenschifffahrt	
		50.30	Personenbeförderung in der Binnenschifffahrt	5021
	50.4		Güterbeförderung in der Binnenschifffahrt	
		50.40	Güterbeförderung in der Binnenschifffahrt	5022
51			Luftfahrt	
	51.1		Personenbeförderung in der Luftfahrt	
		51.10	Personenbeförderung in der Luftfahrt	5110
	51.2		Güterbeförderung in der Luftfahrt und Raumtransport	
		51.21	Güterbeförderung in der Luftfahrt	5120*
		51.22	Raumtransport	5120*
52			Lagerei sowie Erbringung von sonstigen Dienstleistungen für den Verkehr	
	52.1		Lagerei	
		52.10	Lagerei	5210
	52.2		Erbringung von sonstigen Dienstleistungen für den Verkehr	
		52.21	Erbringung von sonstigen Dienstleistungen für den Landverkehr	5221
		52.22	Erbringung von sonstigen Dienstleistungen für die Schifffahrt	5222
		52.23	Erbringung von sonstigen Dienstleistungen für die Luftfahrt	5223
		52.24	Frachtumschlag	5224
		52.29	Erbringung von sonstigen Dienstleistungen für den Verkehr a. n. g.	5229
53			Post-, Kurier- und Expressdienste	
	53.1		Postdienste von Universaldienstleistungsanbietern	
		53.10	Postdienste von Universaldienstleistungsanbietern	5310
	53.2		Sonstige Post-, Kurier- und Expressdienste	
		53.20	Sonstige Post-, Kurier- und Expressdienste	5320
			ABSCHNITT I — GASTGEWERBE/BEHERBERGUNG UND GASTRONOMIE	
55			Beherbergung	
	55.1		Hotels, Gasthöfe und Pensionen	
		55.10	Hotels, Gasthöfe und Pensionen	5510*

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	55.2		Ferienunterkünfte und ähnliche Beherbergungsstätten	
		55.20	Ferienunterkünfte und ähnliche Beherbergungsstätten	5510*
	55.3		Campingplätze	
		55.30	Campingplätze	5520
	55.9		Sonstige Beherbergungsstätten	
		55.90	Sonstige Beherbergungsstätten	5590
56			Gastronomie	
	56.1		Restaurants, Gaststätten, Imbissstuben, Cafés, Eissalons u. Ä.	
		56.10	Restaurants, Gaststätten, Imbissstuben, Cafés, Eissalons u. Ä.	5610
	56.2		Caterer und Erbringung sonstiger Verpflegungsdienstleistungen	
		56.21	Event-Caterer	5621
		56.29	Erbringung sonstiger Verpflegungsdienstleistungen	5629
	56.3		Ausschank von Getränken	
		56.30	Ausschank von Getränken	5630
			ABSCHNITT J — INFORMATION UND KOMMUNIKATION	
58			Verlagswesen	
	58.1		Verlegen von Büchern und Zeitschriften; sonstiges Verlagswesen (ohne Software)	
		58.11	Verlegen von Büchern	5811
		58.12	Verlegen von Adressbüchern und Verzeichnissen	5812
		58.13	Verlegen von Zeitungen	5813*
		58.14	Verlegen von Zeitschriften	5813*
		58.19	Sonstiges Verlagswesen (ohne Software)	5819
	58.2		Verlegen von Software	
		58.21	Verlegen von Computerspielen	5820*
		58.29	Verlegen von sonstiger Software	5820*
59			Herstellung, Verleih und Vertrieb von Filmen und Fernsehprogrammen; Kinos; Tonstudios und Verlegen von Musik	
	59.1		Herstellung von Filmen und Fernsehprogrammen, deren Verleih und Vertrieb, Kinos	
		59.11	Herstellung von Filmen, Videofilmen und Fernsehprogrammen	5911
		59.12	Nachbearbeitung und sonstige Filmtechnik	5912
		59.13	Filmverleih und -vertrieb (ohne Videotheken)	5913
		59.14	Kinos	5914
	59.2		Tonstudios; Herstellung von Hörfunkbeiträgen; Verlegen von bespielten Tonträgern und Musikalien	
		59.20	Tonstudios; Herstellung von Hörfunkbeiträgen; Verlegen von bespielten Tonträgern und Musikalien	5920
60			Rundfunkveranstalter	
	60.1		Hörfunkveranstalter	
		60.10	Hörfunkveranstalter	6010
	60.2		Fernsehveranstalter	
		60.20	Fernsehveranstalter	6020
61			Telekommunikation	
	61.1		Leitungsgebundene Telekommunikation	
		61.10	Leitungsgebundene Telekommunikation	6110
	61.2		Drahtlose Telekommunikation	
		61.20	Drahtlose Telekommunikation	6120
	61.3		Satellitentelekommunikation	
		61.30	Satellitentelekommunikation	6130
	61.9		Sonstige Telekommunikation	
		61.90	Sonstige Telekommunikation	6190
62			Erbringung von Dienstleistungen der Informationstechnologie	
	62.0		Erbringung von Dienstleistungen der Informationstechnologie	
		62.01	Programmierungstätigkeiten	6201
		62.02	Erbringung von Beratungsleistungen auf dem Gebiet der Informationstechnologie	6202*
		62.03	Betrieb von Datenverarbeitungseinrichtungen für Dritte	6202*
		62.09	Erbringung von sonstigen Dienstleistungen der Informationstechnologie	6209

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
63			Informationsdienstleistungen	
	63.1		Datenverarbeitung, Hosting und damit verbundene Tätigkeiten; Webportale	
		63.11	Datenverarbeitung, Hosting und damit verbundene Tätigkeiten	6311
		63.12	Webportale	6312
	63.9		Erbringung von sonstigen Informationsdienstleistungen	
		63.91	Korrespondenz- und Nachrichtenbüros	6391
		63.99	Erbringung von sonstigen Informationsdienstleistungen a. n. g.	6399
			ABSCHNITT K — ERBRINGUNG VON FINANZ- UND VERSICHERUNGSDIENSTLEISTUNGEN	
64			Erbringung von Finanzdienstleistungen	
	64.1		Zentralbanken und Kreditinstitute	
		64.11	Zentralbanken	6411
		64.19	Kreditinstitute (ohne Spezialkreditinstitute)	6419
	64.2		Beteiligungsgesellschaften	
		64.20	Beteiligungsgesellschaften	6420
	64.3		Treuhand- und sonstige Fonds und ähnliche Finanzinstitutionen	
		64.30	Treuhand- und sonstige Fonds und ähnliche Finanzinstitutionen	6430
	64.9		Sonstige Finanzierungsinstitutionen	
		64.91	Institutionen für Finanzierungsleasing	6491
		64.92	Spezialkreditinstitute	6492
		64.99	Sonstige Finanzdienstleistungen a. n. g.	6499
65			Versicherungen, Rückversicherungen und Pensionskassen (ohne Sozialversicherung)	
	65.1		Versicherungen	
		65.11	Lebensversicherung	6511
		65.12	Nichtlebensversicherungen	6512
	65.2		Rückversicherungen	
		65.20	Rückversicherungen	6520
	65.3		Pensionskassen und Pensionsfonds	
		65.30	Pensionskassen und Pensionsfonds	6530
66			Mit Finanz- und Versicherungsdienstleistungen verbundene Tätigkeiten	
	66.1		Mit Finanzdienstleistungen verbundene Tätigkeiten	
		66.11	Effekten- und Warenbörsen	6611
		66.12	Effekten- und Warenhandel	6612
		66.19	Sonstige mit Finanzdienstleistungen verbundene Tätigkeiten	6619
	66.2		Mit Versicherungsdienstleistungen und Pensionskassen verbundene Tätigkeiten	
		66.21	Risiko- und Schadensbewertung	6621
		66.22	Tätigkeit von Versicherungsmaklerinnen und -maklern	6622
		66.29	Sonstige mit Versicherungsdienstleistungen und Pensionskassen verbundene Tätigkeiten	6629
	66.3		Fondsmanagement	
		66.30	Fondsmanagement	6630
			ABSCHNITT L — GRUNDSTÜCKS- UND WOHNUNGSWESEN	
68			Grundstücks- und Wohnungswesen	
	68.1		Kauf und Verkauf von eigenen Grundstücken, Gebäuden und Wohnungen	
		68.10	Kauf und Verkauf von eigenen Grundstücken, Gebäuden und Wohnungen	6810*
	68.2		Vermietung, Verpachtung von eigenen oder geleasten Grundstücken, Gebäuden und Wohnungen	
		68.20	Vermietung, Verpachtung von eigenen oder geleasten Grundstücken, Gebäuden und Wohnungen	6810*
	68.3		Vermittlung und Verwaltung von Grundstücken, Gebäuden und Wohnungen für Dritte	
		68.31	Vermittlung von Grundstücken, Gebäuden und Wohnungen für Dritte	6820*

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
		68.32	Verwaltung von Grundstücken, Gebäuden und Wohnungen für Dritte	6820*
			ABSCHNITT M — ERBRINGUNG VON FREIBERUFLICHEN, WISSENSCHAFTLICHEN UND TECHNISCHEN DIENSTLEISTUNGEN	
69			Rechts- und Steuerberatung, Wirtschaftsprüfung	
	69.1		Rechtsberatung	
		69.10	Rechtsberatung	6910
	69.2		Wirtschaftsprüfung und Steuerberatung; Buchführung	
		69.20	Wirtschaftsprüfung und Steuerberatung; Buchführung	6920
70			Verwaltung und Führung von Unternehmen und Betrieben; Unternehmensberatung	
	70.1		Verwaltung und Führung von Unternehmen und Betrieben	
		70.10	Verwaltung und Führung von Unternehmen und Betrieben	7010
	70.2		Public-Relations- und Unternehmensberatung	
		70.21	Public-Relations-Beratung	7020*
		70.22	Unternehmensberatung	7020*
71			Architektur- und Ingenieurbüros; technische, physikalische und chemische Untersuchung	
	71.1		Architektur- und Ingenieurbüros	
		71.11	Architekturbüros	7110*
		71.12	Ingenieurbüros	7110*
	71.2		Technische, physikalische und chemische Untersuchung	
		71.20	Technische, physikalische und chemische Untersuchung	7120
72			Forschung und Entwicklung	
	72.1		Forschung und Entwicklung im Bereich Natur-, Ingenieur-, Agrarwissenschaften und Medizin	
		72.11	Forschung und Entwicklung im Bereich Biotechnologie	7210*
		72.19	Sonstige Forschung und Entwicklung im Bereich Natur-, Ingenieur-, Agrarwissenschaften und Medizin	7210*
	72.2		Forschung und Entwicklung im Bereich Rechts-, Wirtschafts- und Sozialwissenschaften sowie im Bereich Sprach-, Kultur- und Kunstwissenschaften	
		72.20	Forschung und Entwicklung im Bereich Rechts-, Wirtschafts- und Sozialwissenschaften sowie im Bereich Sprach-, Kultur- und Kunstwissenschaften	7220
73			Werbung und Marktforschung	
	73.1		Werbung	
		73.11	Werbeagenturen	7310*
		73.12	Vermarktung und Vermittlung von Werbezeiten und Werbeflächen	7310*
	73.2		Markt- und Meinungsforschung	
		73.20	Markt- und Meinungsforschung	7320
74			Sonstige freiberufliche, wissenschaftliche und technische Tätigkeiten	
	74.1		Ateliers für Textil-, Schmuck-, Grafik- u. ä. Design	
		74.10	Ateliers für Textil-, Schmuck-, Grafik- u. ä. Design	7410
	74.2		Fotografie und Fotolabors	
		74.20	Fotografie und Fotolabors	7420
	74.3		Übersetzen und Dolmetschen	
		74.30	Übersetzen und Dolmetschen	7490*
	74.9		Sonstige freiberufliche, wissenschaftliche und technische Tätigkeiten a. n. g.	
		74.90	Sonstige freiberufliche, wissenschaftliche und technische Tätigkeiten a. n. g.	7490*
75			Veterinärwesen	
	75.0		Veterinärwesen	
		75.00	Veterinärwesen	7500
			ABSCHNITT N — ERBRINGUNG VON SONSTIGEN WIRTSCHAFTLICHEN DIENSTLEISTUNGEN	
77			Vermietung von beweglichen Sachen	
	77.1		Vermietung von Kraftwagen	
		77.11	Vermietung von Kraftwagen mit einem Gesamtgewicht von 3,5 t oder weniger	7710*
		77.12	Vermietung von Kraftwagen mit einem Gesamtgewicht von mehr als 3,5 t	7710*

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
	77.2		Vermietung von Gebrauchsgütern	
		77.21	Vermietung von Sport- und Freizeitgeräten	7721
		77.22	Videotheken	7722
		77.29	Vermietung von sonstigen Gebrauchsgütern	7729
	77.3		Vermietung von Maschinen, Geräten und sonstigen beweglichen Sachen	
		77.31	Vermietung von landwirtschaftlichen Maschinen und Geräten	7730*
		77.32	Vermietung von Baumaschinen und –geräten	7730*
		77.33	Vermietung von Büromaschinen, Datenverarbeitungsgeräten und -einrichtungen	7730*
		77.34	Vermietung von Wasserfahrzeugen	7730*
		77.35	Vermietung von Luftfahrzeugen	7730*
		77.39	Vermietung von sonstigen Maschinen, Geräten und beweglichen Sachen a. n. g.	7730*
	77.4		Leasing von nichtfinanziellen immateriellen Vermögensgegenständen (ohne Copyrights)	
		77.40	Leasing von nichtfinanziellen immateriellen Vermögensgegenständen (ohne Copyrights)	7740
78			Vermittlung und Überlassung von Arbeitskräften	
	78.1		Vermittlung von Arbeitskräften	
		78.10	Vermittlung von Arbeitskräften	7810
	78.2		Befristete Überlassung von Arbeitskräften	
		78.20	Befristete Überlassung von Arbeitskräften	7820
	78.3		Sonstige Überlassung von Arbeitskräften	
		78.30	Sonstige Überlassung von Arbeitskräften	7830
79			Reisebüros, Reiseveranstalter und Erbringung sonstiger Reservierungsdienstleistungen	
	79.1		Reisebüros und Reiseveranstalter	
		79.11	Reisebüros	7911
		79.12	Reiseveranstalter	7912
	79.9		Erbringung sonstiger Reservierungsdienstleistungen	
		79.90	Erbringung sonstiger Reservierungsdienstleistungen	7990
80			Wach- und Sicherheitsdienste sowie Detekteien	
	80.1		Private Wach- und Sicherheitsdienste	
		80.10	Private Wach- und Sicherheitsdienste	8010
	80.2		Sicherheitsdienste mithilfe von Überwachungs- und Alarmsystemen	
		80.20	Sicherheitsdienste mithilfe von Überwachungs- und Alarmsystemen	8020
	80.3		Detekteien	
		80.30	Detekteien	8030
81			Gebäudebetreuung; Garten- und Landschaftsbau	
	81.1		Hausmeisterdienste	
		81.10	Hausmeisterdienste	8110
	81.2		Reinigung von Gebäuden, Straßen und Verkehrsmitteln	
		81.21	Allgemeine Gebäudereinigung	8121
		81.22	Spezielle Reinigung von Gebäuden und Reinigung von Maschinen	8129*
		81.29	Reinigung a. n. g.	8129*
	81.3		Garten- und Landschaftsbau sowie Erbringung von sonstigen gärtnerischen Dienstleistungen	
		81.30	Garten- und Landschaftsbau sowie Erbringung von sonstigen gärtnerischen Dienstleistungen	8130
82			Erbringung von wirtschaftlichen Dienstleistungen für Unternehmen und Privatpersonen a. n. g.	
	82.1		Sekretariats- und Schreibdienste, Copy-Shops	
		82.11	Allgemeine Sekretariats- und Schreibdienste	8211
		82.19	Copy-Shops; Dokumentenvorbereitung und Erbringung sonstiger spezieller Sekretariatsdienste	8219
	82.2		Call Centers	
		82.20	Call Centers	8220

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
	82.3		Messe-, Ausstellungs- und Kongressveranstalter	
		82.30	Messe-, Ausstellungs- und Kongressveranstalter	8230
	82.9		Erbringung sonstiger wirtschaftlicher Dienstleistungen für Unternehmen und Privatpersonen	
		82.91	Inkassobüros und Auskunfteien	8291
		82.92	Abfüllen und Verpacken	8292
		82.99	Erbringung sonstiger wirtschaftlicher Dienstleistungen für Unternehmen und Privatpersonen a. n. g.	8299
			ABSCHNITT O — ÖFFENTLICHE VERWALTUNG, VERTEIDIGUNG; SOZIALVERSICHERUNG	
84			Öffentliche Verwaltung, Verteidigung; Sozialversicherung	
	84.1		Öffentliche Verwaltung	
		84.11	Allgemeine öffentliche Verwaltung	8411
		84.12	Öffentliche Verwaltung auf den Gebieten Gesundheitswesen, Bildung, Kultur und Sozialwesen	8412
		84.13	Wirtschaftsförderung, -ordnung und –aufsicht	8413
	84.2		Auswärtige Angelegenheiten, Verteidigung, Rechtspflege/Justiz, öffentliche Sicherheit und Ordnung	
		84.21	Auswärtige Angelegenheiten	8421
		84.22	Verteidigung	8422
		84.23	Rechtspflege/Justiz	8423*
		84.24	Öffentliche Sicherheit und Ordnung	8423*
		84.25	Feuerwehren	8423*
	84.3		Sozialversicherung	
		84.30	Sozialversicherung	8430
			ABSCHNITT P — ERZIEHUNG UND UNTERRICHT	
85			Erziehung und Unterricht	
	85.1		Kindergärten und Vorschulen	
		85.10	Kindergärten und Vorschulen	8510*
	85.2		Grundschulen/Volksschulen	
		85.20	Grundschulen/Volksschulen	8510*
	85.3		Weiterführende Schulen	
		85.31	Allgemein bildende weiterführende Schulen	8521
		85.32	Berufsbildende weiterführende Schulen	8522
	85.4		Tertiärer und post-sekundärer, nicht tertiärer Unterricht	
		85.41	Post-sekundärer, nicht tertiärer Unterricht	8530*
		85.42	Tertiärer Unterricht	8530*
	85.5		Sonstiger Unterricht	
		85.51	Sport- und Freizeitunterricht	8541
		85.52	Kulturunterricht	8542
		85.53	Fahr- und Flugschulen	8549*
		85.59	Sonstiger Unterricht a. n. g.	8549*
	85.6		Erbringung von Dienstleistungen für den Unterricht	
		85.60	Erbringung von Dienstleistungen für den Unterricht	8550
			ABSCHNITT Q — GESUNDHEITS- UND SOZIALWESEN	
86			Gesundheitswesen	
	86.1		Krankenhäuser	
		86.10	Krankenhäuser	8610
	86.2		Arzt- und Zahnarztpraxen	
		86.21	Arztpraxen für Allgemeinmedizin	8620*
		86.22	Facharztpraxen	8620*
		86.23	Zahnarztpraxen	8620*
	86.9		Gesundheitswesen a. n. g.	
		86.90	Gesundheitswesen a. n. g.	8690
87			Heime (ohne Erholungs- und Ferienheime)	
	87.1		Pflegeheime	

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Abteilung	Gruppe	Klasse		ISIC Rev. 4
		87.10	Pflegeheime	8710
	87.2		Stationäre Einrichtungen zur psychosozialen Betreuung, Suchtbekämpfung u. Ä.	
		87.20	Stationäre Einrichtungen zur psychosozialen Betreuung, Suchtbekämpfung u. Ä.	8720
	87.3		Altenheime; Alten- und Behindertenwohnheime	
		87.30	Altenheime; Alten- und Behindertenwohnheime	8730
	87.9		Sonstige Heime (ohne Erholungs- und Ferienheime)	
		87.90	Sonstige Heime (ohne Erholungs- und Ferienheime)	8790
88			Sozialwesen (ohne Heime)	
	88.1		Soziale Betreuung älterer Menschen und Behinderter	
		88.10	Soziale Betreuung älterer Menschen und Behinderter	8810
	88.9		Sonstiges Sozialwesen (ohne Heime)	
		88.91	Tagesbetreuung von Kindern	8890*
		88.99	Sonstiges Sozialwesen a. n. g.	8890*
			ABSCHNITT R — KUNST, UNTERHALTUNG UND ERHOLUNG	
90			Kreative, künstlerische und unterhaltende Tätigkeiten	
	90.0		Kreative, künstlerische und unterhaltende Tätigkeiten	
		90.01	Darstellende Kunst	9000*
		90.02	Erbringung von Dienstleistungen für die darstellende Kunst	9000*
		90.03	Künstlerisches und schriftstellerisches Schaffen	9000*
		90.04	Betrieb von Kultur- und Unterhaltungseinrichtungen	9000*
91			Bibliotheken, Archive, Museen, botanische und zoologische Gärten	
	91.0		Bibliotheken, Archive, Museen, botanische und zoologische Gärten	
		91.01	Bibliotheken und Archive	9101
		91.02	Museen	9102*
		91.03	Betrieb von historischen Stätten und Gebäuden und ähnlichen Attraktionen	9102*
		91.04	Botanische und zoologische Gärten sowie Naturparks	9103
92			Spiel-, Wett- und Lotteriewesen	
	92.0		Spiel-, Wett- und Lotteriewesen	
		92.00	Spiel-, Wett- und Lotteriewesen	9200
93			Erbringung von Dienstleistungen des Sports, der Unterhaltung und der Erholung	
	93.1		Erbringung von Dienstleistungen des Sports	
		93.11	Betrieb von Sportanlagen	9311*
		93.12	Sportvereine	9312
		93.13	Fitnesszentren	9311*
		93.19	Erbringung von sonstigen Dienstleistungen des Sports	9319
	93.2		Erbringung von sonstigen Dienstleistungen der Unterhaltung und der Erholung	
		93.21	Vergnügungs- und Themenparks	9321
		93.29	Erbringung von Dienstleistungen der Unterhaltung und der Erholung a. n. g.	9329
			ABSCHNITT S — ERBRINGUNG VON SONSTIGEN DIENSTLEISTUNGEN	
94			Interessenvertretungen sowie kirchliche und sonstige religiöse Vereinigungen (ohne Sozialwesen und Sport)	
	94.1		Wirtschafts- und Arbeitgeberverbände, Berufsorganisationen	
		94.11	Wirtschafts- und Arbeitgeberverbände	9411
		94.12	Berufsorganisationen	9412
	94.2		Arbeitnehmervereinigungen	
		94.20	Arbeitnehmervereinigungen	9420
	94.9		Kirchliche Vereinigungen; politische Parteien sowie sonstige Interessenvertretungen und Vereinigungen a. n. g.	
		94.91	Kirchliche und sonstige religiöse Vereinigungen	9491
		94.92	Politische Parteien und Vereinigungen	9492
		94.99	Sonstige Interessenvertretungen und Vereinigungen a. n. g.	9499

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95			Reparatur von Datenverarbeitungsgeräten und Gebrauchsgütern	
	95.1		Reparatur von Datenverarbeitungs- und Telekommunikationsgeräten	
		95.11	Reparatur von Datenverarbeitungsgeräten und peripheren Geräten	9511
		95.12	Reparatur von Telekommunikationsgeräten	9512
	95.2		Reparatur von Gebrauchsgütern	
		95.21	Reparatur von Geräten der Unterhaltungselektronik	9521
		95.22	Reparatur von elektrischen Haushaltsgeräten und Gartengeräten	9522
		95.23	Reparatur von Schuhen und Lederwaren	9523
		95.24	Reparatur von Möbeln und Einrichtungsgegenständen	9524
		95.25	Reparatur von Uhren und Schmuck	9529*
		95.29	Reparatur von sonstigen Gebrauchsgütern	9529*
96			Erbringung von sonstigen überwiegend persönlichen Dienstleistungen	
	96.0		Erbringung von sonstigen überwiegend persönlichen Dienstleistungen	
		96.01	Wäscherei und chemische Reinigung	9601
		96.02	Frisör- und Kosmetiksalons	9602
		96.03	Bestattungswesen	9603
		96.04	Saunas, Solarien, Bäder u. Ä.	9609*
		96.09	Erbringung von sonstigen Dienstleistungen a. n. g.	9609*
			ABSCHNITT T — PRIVATE HAUSHALTE MIT HAUSPERSONAL; HERSTELLUNG VON WAREN UND ERBRINGUNG VON DIENSTLEISTUNGEN DURCH PRIVATE HAUSHALTE FÜR DEN EIGENBEDARF OHNE AUSGEPRÄGTEN SCHWERPUNKT	
97			Private Haushalte mit Hauspersonal	
	97.0		Private Haushalte mit Hauspersonal	
		97.00	Private Haushalte mit Hauspersonal	9700
98			Herstellung von Waren und Erbringung von Dienstleistungen durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt	
	98.1		Herstellung von Waren durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt	
		98.10	Herstellung von Waren durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt	9810
	98.2		Erbringungen von Dienstleistungen durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt	
		98.20	Erbringungen von Dienstleistungen durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt	9820
			ABSCHNITT U — EXTERRITORIALE ORGANISATIONEN UND KÖRPERSCHAFTEN	
99			Exterritoriale Organisationen und Körperschaften	
	99.0		Exterritoriale Organisationen und Körperschaften	
		99.00	Exterritoriale Organisationen und Körperschaften	9900

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ANHANG II

Die Anhänge 1, 2, 3, 4, 5, 6 und 7 der Verordnung (EG, Euratom) Nr. 58/97 werden wie folgt geändert:

1. Anhang 1 (Gemeinsames Modul für die jährliche Strukturstatistik) wird wie folgt geändert:

1.1. Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
NACE Rev. 1 Abschnitt J	NACE Rev. 2 Abschnitt K
NACE Rev. 1 Gruppe 65.2 und Abteilung 67	NACE Rev. 2 Gruppen 64.2, 64.3 und 64.9 sowie Abteilung 66
Abschnitte C bis G der NACE Rev. 1	Abschnitte B bis G der NACE Rev. 2
NACE Rev. 1 Klasse 65.11	NACE Rev. 2 Klasse 64.11
Abteilungen 65 und 66 der NACE Rev. 1	Abteilungen 64 and 65 der NACE Rev. 2
Abschnitte H, I und K der NACE Rev. 1	Abschnitte H, I, J, L, M, N und Abteilung 95 der NACE Rev. 2

1.2. Abschnitt 9 erhält folgende Fassung:

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„Abschnitt 9

Tätigkeitsgruppen

Die folgenden Gruppierungen von Wirtschaftszweigen beziehen sich auf die Klassifikation der NACE Rev. 2.

ABSCHNITTE B, C, D, E UND F

Bergbau und Gewinnung von Steinen und Erden; Verarbeitendes Gewerbe/Herstellung von Waren; Energieversorgung; Wasserversorgung; Abwasser- und Abfallentsorgung und Beseitigung von Umweltverschmutzungen; Baugewerbe/Bau.

Um die Erstellung von Statistiken auf Gemeinschaftsebene zu ermöglichen, übermitteln die Mitgliedstaaten die nach den Klassen der NACE Rev. 2 aufgeschlüsselten nationalen Ergebnisse.

ABSCHNITT G

Handel; Instandhaltung und Reparatur von Kraftfahrzeugen

Um die Erstellung von Statistiken auf Gemeinschaftsebene zu ermöglichen, übermitteln die Mitgliedstaaten die nach den Klassen der NACE Rev. 2 aufgeschlüsselten nationalen Ergebnisse.

ABSCHNITT H

Verkehr und Lagerei

49.1+49.2	‚Personenbeförderung im Eisenbahnfernverkehr' und ‚Güterbeförderung im Eisenbahnverkehr'
49.3	Sonstige Personenbeförderung im Landverkehr
49.4	Güterbeförderung im Straßenverkehr, Umzugstransporte
49.5	Transport in Rohrfernleitungen
50.1+50.2	‚Personenbeförderung in der See- und Küstenschifffahrt' und ‚Güterbeförderung in der See- und Küstenschifffahrt'
50.3+50.4	‚Personenbeförderung in der Binnenschifffahrt' und ‚Güterbeförderung in der Binnenschifffahrt'
51	Luftfahrt

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52	Lagerei sowie Erbringung von sonstigen Dienstleistungen für den Verkehr
53.1	Postdienste von Universaldienstleistungsanbietern
53.2	Sonstige Post-, Kurier- und Expressdienste

ABSCHNITT I

Gastgewerbe/Beherbergung und Gastronomie

55	Beherbergung
56	Gastronomie

ABSCHNITT J

Information und Kommunikation

58	Verlagswesen
59	Herstellung, Verleih und Vertrieb von Filmen und Fernsehprogrammen; Kinos; Tonstudios und Verlegen von Musik
60	Rundfunkveranstalter
61	Telekommunikation
62	Erbringung von Dienstleistungen der Informationstechnologie
63	Informationsdienstleistungen

ABSCHNITT K

Erbringung von Finanz- und Versicherungsdienstleistungen

Um die Erstellung von Statistiken auf Gemeinschaftsebene zu ermöglichen, übermitteln die Mitgliedstaaten die nach den Klassen der NACE Rev. 2 aufgeschlüsselten nationalen Ergebnisse.

ABSCHNITT L

Grundstücks- und Wohnungswesen

68	Grundstücks- und Wohnungswesen

ABSCHNITT M

Erbringung von freiberuflichen, wissenschaftlichen und technischen Dienstleistungen

69+70	‚Rechts- und Steuerberatung, Wirtschaftsprüfung' und ‚Verwaltung und Führung von Unternehmen und Betrieben; Unternehmensberatung'
71	Architektur- und Ingenieurbüros; technische, physikalische und chemische Untersuchung
72	Forschung und Entwicklung
73.1	Werbung
73.2	Markt- und Meinungsforschung
74	Sonstige freiberufliche, wissenschaftliche und technische Tätigkeiten
75	Veterinärwesen

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ABSCHNITT N	
Erbringung von sonstigen wirtschaftlichen Dienstleistungen	
77.1	Vermietung von Kraftwagen
77.2	Vermietung von Gebrauchsgütern
77.3	Vermietung von Maschinen, Geräten und sonstigen beweglichen Sachen
77.4	Leasing von nichtfinanziellen immateriellen Vermögensgegenständen (ohne Copyrights)
78	Vermittlung und Überlassung von Arbeitskräften
79	Reisebüros, Reiseveranstalter und Erbringung sonstiger Reservierungsdienstleistungen
80	Wach- und Sicherheitsdienste sowie Detekteien
81	Gebäudebetreuung; Garten- und Landschaftsbau
82	Erbringung von wirtschaftlichen Dienstleistungen für Unternehmen und Privatpersonen a. n. g.
ABSCHNITT S	
Erbringung von sonstigen Dienstleistungen	
95.11	Reparatur von Datenverarbeitungsgeräten und peripheren Geräten
95.12	Reparatur von Telekommunikationsgeräten
95.21	Reparatur von Geräten der Unterhaltungselektronik
95.22	Reparatur von elektrischen Haushaltsgeräten und Gartengeräten
95.23	Reparatur von Schuhen und Lederwaren
95.24	Reparatur von Möbeln und Einrichtungsgegenständen
95.25	Reparatur von Uhren und Schmuck
95.29	Reparatur von sonstigen Gebrauchsgütern“

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2. Anhang 2 (Einzelmodul für die Strukturstatistik der Industrie) wird wie folgt geändert:

2.1. Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Abschnitt C der NACE Rev. 1	Abschnitt B der NACE Rev. 2
Abschnitt D der NACE Rev. 1	Abschnitt C der NACE Rev. 2
Abschnitt E der NACE Rev. 1	Abschnitte D und E der NACE Rev. 2
Abteilungen 17/18/19/21/22/25/28/31/32/36 der NACE Rev. 1	Abteilungen 13/14/15/17/18/22/25/26/31 der NACE Rev. 2

2.2. Abschnitt 3 erhält folgende Fassung:

„Abschnitt 3

Geltungsbereich

Die Statistiken werden für alle unter die Abschnitte B, C, D und E der NACE Rev. 2 fallenden Tätigkeiten erstellt. Diese Abschnitte umfassen die Tätigkeiten des Bergbaus und der Gewinnung von Steinen und Erden (B), des Verarbeitenden Gewerbes/der Herstellung von Waren (C), der Energieversorgung (D) und der Wasserversorgung; Abwasser- und Abfallentsorgung und Beseitigung von Umweltverschmutzungen (E). Die Unternehmensstatistiken beziehen sich auf die Grundgesamtheit aller Unternehmen, die entsprechend ihren Haupttätigkeiten den Abschnitten B, C, D oder E zugeordnet sind.“

#RV0624

3. Anhang 3 (Einzelmodul für die Strukturstatistik des Handels) wird wie folgt geändert:

3.1. Abschnitt 3 Absatz 1 erhält folgende Fassung:

„1. Die Statistiken werden für alle unter Abschnitt G der NACE Rev. 2 fallenden Tätigkeiten erstellt. Dieser Sektor umfasst die Tätigkeiten des Handels sowie der Instandhaltung und Reparatur von Kraftfahrzeugen. Die Unternehmensstatistiken beziehen sich auf die Grundgesamtheit aller Unternehmen, die entsprechend ihrer Haupttätigkeiten Abschnitt G zugeordnet sind."

3.2. Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Abteilung 50 der NACE Rev. 1	Abteilung 45 der NACE Rev. 2
Abteilung 51 der NACE Rev. 1	Abteilung 46 der NACE Rev. 2
Abteilung 52 der NACE Rev. 1	Abteilung 47 der NACE Rev. 2

In Abschnitt 5 „Erstes Berichtsjahr" und in Abschnitt 9 „Berichte und Pilotuntersuchungen" wird die Bezugnahme auf die Abteilungen 50, 51 bzw. 52 der NACE Rev. 1 beibehalten.

4. Anhang 4 (Einzelmodul für die Strukturstatistik des Baugewerbes) wird wie folgt geändert:

Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Gruppen 45.1 und 45.2 der NACE Rev. 1	Abteilungen 41 und 42 sowie Gruppen 43.1 und 43.9 der NACE Rev. 2

5. Anhang 5 (Einzelmodul für die Strukturstatistik der Versicherung) wird wie folgt geändert:

Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Abteilung 66 außer Klasse 66.02 der NACE Rev. 1	Abteilung 65 außer Gruppe 65.3 der NACE Rev. 2

6. Anhang 6 (Einzelmodul für die Strukturstatistik der Kreditinstitute) wird wie folgt geändert:

Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Klassen 65.12 und 65.22 der NACE Rev. 1	Klassen 64.19 und 64.92 der NACE Rev. 2

7. Anhang 7 (Einzelmodul für die Strukturstatistik der Pensionsfonds) wird wie folgt geändert:

Im gesamten Text werden folgende Ersetzungen vorgenommen:

Bisheriger Wortlaut	Geänderter Wortlaut
Klasse 66.02 der NACE Rev. 1	Gruppe 65.3 der NACE Rev. 2

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#RV0625

ANHANG III

Die Anhänge A, B, C und D der Verordnung (EG) Nr. 1165/98 werden wie folgt geändert:

1. Anhang A

1.1. In Anhang A erhält Buchstabe a („Geltungsbereich“) folgende Fassung:

„a) Geltungsbereich

Dieser Anhang gilt für alle in den Abschnitten B bis E der NACE Rev. 2 aufgeführten Tätigkeiten bzw. für alle in den Abschnitten B bis E der CPA aufgeführten Produkte. Für die Positionen 37, 38.1, 38.2 und 39 der NACE Rev. 2 sind keine Angaben erforderlich. Die Liste der Tätigkeiten kann nach dem Verfahren des Artikels 18 geändert werden.“

1.2. In Anhang A Buchstabe c („Liste der Variablen“) erhalten die Nummern 6, 7 und 8 folgende Fassung:

„6. Die Daten über die Produktion (Nr. 110) sind für die Abteilung 36 und die Gruppen 35.3 und 38.3 der NACE Rev. 2 nicht erforderlich.

7. Die Daten über den Umsatz (Nrn. 120, 121 und 122) sind für die Abschnitte D und E der NACE Rev. 2 nicht erforderlich.

8. Die Daten über die Aufträge (Nrn. 130, 131 und 132) sind nur für die folgenden Abteilungen der NACE Rev. 2 erforderlich: 13, 14, 17, 20, 21, 24, 25, 26, 27, 28, 29, 30. Die Liste der Tätigkeiten kann nach dem Verfahren des Artikels 18 geändert werden.“

1.3. In Anhang A Buchstabe c („Liste der Variablen“) erhalten die Nummern 9 und 10 folgende Fassung:

„9. Die Daten über die Variablen Nr. 210, 220 und 230 sind für die Gruppe 38.2 der NACE Rev. 2 nicht erforderlich.

10. Die Daten über die Erzeugerpreise und Einfuhrpreise (Nrn. 310, 311, 312 und 340) sind für folgende Gruppen bzw. Klassen der NACE Rev. 2 bzw. der CPA nicht erforderlich: 07.2, 24.46, 25.4, 30.1, 30.3, 30.4 und 38.3. Die Liste der Tätigkeiten kann nach dem Verfahren des Artikels 18 geändert werden.

11. Die Einfuhrpreisvariable (Nr. 340) wird auf der Basis von CPA-Gütern berechnet. Die einführenden fachlichen Einheiten können auch anderen als den Abschnitten B bis E der NACE Rev. 2 angehören.“

1.4. In Anhang A Buchstabe f („Gliederungstiefe“) erhalten die Nummern 1 und 2 folgende Fassung:

„1. Alle Variablen mit Ausnahme der Einfuhrpreisvariablen (Nr. 340) sind auf der Ebene der Abschnitte (1 Buchstabe) und der Abteilungen (Zweisteller) der NACE Rev. 2 zu übermitteln. Die Variable Nr. 340 ist auf der Ebene der Abschnitte (1 Buchstabe) und der Abteilungen (Zweisteller) der CPA zu melden.

2. Für den Abschnitt C der NACE Rev. 2 sind außerdem der Produktionsindex (Nr. 110) und der Index der Erzeugerpreise (Nrn. 310, 311, 312) auf der Ebene der Drei- und Viersteller der NACE Rev. 2 zu übermitteln. In die übermittelten Produktions- und Erzeugerpreisindizes auf der Ebene der Drei- und Viersteller müssen bei jedem Mitgliedstaat mindestens 90 % der Wertschöpfung des Abschnitts C der NACE Rev. 2 im jeweiligen Basisjahr eingegangen sein. Mitgliedstaaten, bei denen die Wertschöpfung des Abschnitts C der NACE Rev. 2 im jeweiligen Basisjahr weniger als 4 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, müssen die Variablen nicht in dieser Gliederungstiefe übermitteln.“

1.5. In Anhang A Buchstabe f („Gliederungstiefe“) wird unter Nummer 3 „NACE Rev. 1“ durch „NACE Rev. 2“ ersetzt.

1.6. In Anhang A Buchstabe f („Gliederungstiefe“) erhalten die Nummern 4, 5, 6 und 7 folgende Fassung:

„4. Außerdem sind alle Variablen mit Ausnahme der Umsatz- und der Auftragseingangsvariablen (Nrn. 120, 121, 122, 130, 131, 132) für die gesamte Industrie, d. h. für die Abschnitte B bis E der NACE Rev. 2, sowie für die industriellen Hauptgruppen (MIG) zu übermitteln, die in der Verordnung (EG) Nr. 586/2001 der Kommission [1] definiert sind.

5. Die Umsatzvariablen (Nrn. 120, 121, 122) sind für die gesamte Industrie, d. h. für die Abschnitte B und C der NACE Rev. 2, sowie für die MIG mit Ausnahme der industriellen Hauptgruppe, die für Tätigkeiten im Energiebereich definiert ist, zu übermitteln.

[1] ABl. L 86 vom 27.3.2001, S. 11.“

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6. Die Auftragseingangsvariablen (Nrn. 130, 131, 132) sind für das gesamte Verarbeitende Gewerbe/die gesamte Herstellung von Waren, d. h. Abschnitt C der NACE Rev. 2, sowie für einen verkleinerten Satz von MIG zu übermitteln, der so zusammengestellt ist, dass er die Liste der unter Buchstabe c ‚Liste der Variablen' Nummer 8 dieses Anhangs aufgeführten Abteilungen der NACE Rev. 2 umfasst.

7. Die Einfuhrpreisvariable (Nr. 340) ist für sämtliche Industriegüter, d. h. die Abschnitte B bis E der CPA, sowie für die MIG, die nach Maßgabe der Verordnung (EG) Nr. 586/2001 aus den Gütergruppen der CPA gebildet wurden, zu übermitteln. Mitgliedstaaten, die den Euro nicht als Währung eingeführt haben, müssen diese Variable nicht übermitteln.

1.7. In Anhang A Buchstabe f („Gliederungstiefe") erhalten die Nummern 9 und 10 folgende Fassung:

„9. Die Variablen zum Auslandsmarkt (Nrn. 122, 132 und 312) sind nach Eurozone und Nicht-Eurozone gegliedert zu übermitteln. Diese Gliederung ist für die gesamte Industrie, d. h. die Abschnitte B bis E der NACE, die MIG sowie die Ebenen der Abschnitte (1 Buchstabe) und der Abteilungen (Zweisteller) der NACE Rev. 2 vorzunehmen. Die Variable Nr. 122 ist für die Abschnitte D und E der NACE Rev. 2 nicht erforderlich. Zusätzlich ist die Einfuhrpreisvariable (Nr. 340) nach Eurozone und Nicht-Eurozone gegliedert zu übermitteln. Diese Gliederung ist für die gesamte Industrie, d. h. die Abschnitte B bis E der CPA, die MIG sowie die Ebenen der Abschnitte (1 Buchstabe) und der Abteilungen (Zweisteller) der CPA vorzunehmen. Bei der Gliederung nach Eurozone und Nicht-Eurozone kann die Kommission nach dem in Artikel 18 genannten Verfahren die Bedingungen für die Anwendung eines europäischen Stichprobenplans im Sinne des Artikels 4 Absatz 2 Unterabsatz 1 Buchstabe d festlegen. Der europäische Stichprobenplan kann den Erfassungsbereich der Einfuhrpreisvariablen auf die Einfuhr von Gütern aus Nicht-Eurozone-Ländern beschränken. Die Mitgliedstaaten, die den Euro nicht als Währung eingeführt haben, müssen die Gliederung der Variablen Nrn. 122, 132, 312 und 340 nach Eurozone und Nicht-Eurozone nicht übermitteln.

10. Die Mitgliedstaaten, deren Wertschöpfung in den Abteilungen B, C, D und E der NACE Rev. 2 im jeweiligen Basisjahr weniger als 1 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, müssen nur Daten zur gesamten Industrie, zu den MIG und zur Ebene der Abschnitte der NACE Rev. 2 bzw. der CPA übermitteln."

1.8. In Anhang A Buchstabe g („Fristen für die Datenübermittlung") erhält die Nummer 2 folgende Fassung:

„2. Für Daten zu den Ebenen der Gruppen und Klassen der NACE Rev. 2 bzw. der CPA kann die Frist um maximal 15 Kalendertage verlängert werden. Für Mitgliedstaaten, deren Wertschöpfung in den Abschnitten B, C, D und E der NACE Rev. 2 in dem jeweiligen Basisjahr weniger als 3 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, kann die Frist für Daten zur gesamten Industrie, zu den MIG sowie zu den Ebenen der Abschnitte und Abteilungen der NACE Rev. 2 bzw. der CPA um maximal 15 Kalendertage verlängert werden."

1.9. Dem Anhang A Buchstabe i („Erster Bezugszeitraum") wird folgender Absatz angefügt:

„Der erste Bezugszeitraum, für den alle Variablen gemäß der NACE Rev. 2 zu übermitteln sind, ist für monatliche Daten der Januar 2009 und für vierteljährliche Daten das 1. Quartal 2009."

2. Anhang B

2.1. Anhang B Buchstabe a („Geltungsbereich") erhält folgende Fassung:

„a) Geltungsbereich

Dieser Anhang gilt für alle in Abschnitt F der NACE Rev. 2 aufgeführten Tätigkeiten."

2.2. In Anhang B Buchstabe e („Bezugszeitraum") wird „NACE" durch „NACE Rev. 2" ersetzt.

2.3. In Anhang B Buchstabe f („Gliederungstiefe") erhalten die Nummern 1 und 2 folgende Fassung:

„1. Die Variablen Nrn. 110, 210, 220 und 230 sind mindestens auf der Ebene der Abschnitte der NACE Rev. 2 zu übermitteln.

2. Die Variablen für den Auftragseingang (Nrn. 130, 135 und 136) sind nur für die Gruppe 41.2 und die Abteilung 42 der NACE Rev. 2 erforderlich."

2.4. In Anhang B Buchstabe f („Gliederungstiefe") wird unter Nummer 6 „NACE" durch „NACE Rev. 2" ersetzt.

2.5. In Anhang B Buchstabe g („Fristen für die Datenübermittlung") wird unter Nummer 2 „NACE Rev. 1" durch „NACE Rev. 2" ersetzt.

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2.6. Dem Anhang B Buchstabe i („Erstes Bezugsjahr“) wird folgender Absatz angefügt:

„Der erste Bezugszeitraum, für den alle Variablen gemäß der NACE Rev. 2 zu übermitteln sind, ist für monatliche Daten der Januar 2009 und für vierteljährliche Daten das 1. Quartal 2009.“

3. Anhang C

3.1. Anhang C Buchstabe a („Geltungsbereich“) erhält folgende Fassung:

„a) Geltungsbereich

Dieser Anhang gilt für die in der Abteilung 47 der NACE Rev. 2 aufgeführten Tätigkeiten.“

3.2. In Anhang C Buchstabe f („Gliederungstiefe“) erhalten die Nummern 1, 2, 3, 4 und 5 folgende Fassung:

„1. Die Variablen zum Umsatz (Nr. 120) sowie zum Umsatzdeflator/Umsatzvolumen (Nrn. 330/123) sind in den unter den Nummern 2 und 3 festgelegten Gliederungstiefen zu übermitteln. Die Variable zur Beschäftigtenzahl (Nr. 210) ist in der unter Nummer 4 festgelegten Gliederungstiefe zu übermitteln.

2. Detaillierte Ebene für folgende Klassen und Gruppen der NACE Rev. 2:

Klasse 47.11;

Klasse 47.19;

Gruppe 47.2;

Gruppe 47.3;

Summe der Klassen 47.73, 47.74 und 47.75;

Summe der Klassen 47.51, 47.71 und 47.72;

Summe der Klassen 47.43, 47.52, 47.54, 47.59 und 47.63;

Summe der Klassen 47.41, 47.42, 47.53, 47.61, 47.62, 47.64, 47.65, 47.76, 47.77 und 47.78;

Klasse 47.91.

3. Aggregierte Ebenen für folgende Klassen und Gruppen der NACE Rev. 2:

Summe der Klasse 47.11 und der Gruppe 47.2;

Summe der Klasse 47.19 und der Gruppen 47.4, 47.5, 47.6, 47.7, 47.8 und 47.9;

Abteilung 47

Abteilung 47 ohne 47.3

4. Abteilung 47

Abteilung 47 ohne 47.3

5. Die Mitgliedstaaten, deren Umsatz in der Abteilung 47 der NACE Rev. 2 im jeweiligen Basisjahr weniger als 1 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, müssen nur die Umsatzvariable (Nr. 120) sowie die Variablen zum Umsatzdeflator/Umsatzvolumen (Nrn. 330/123) in der unter Nummer 3 vorgegebenen Gliederungstiefe übermitteln.“

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#RV0628

3.3. In Anhang C Buchstabe g („Fristen für die Datenübermittlung“) erhalten die Nummern 1, 2 und 3 folgende Fassung:

„1. Die Variablen zum Umsatz (Nr. 120) und zum Umsatzdeflator/Umsatzvolumen (Nrn. 330/123) werden innerhalb von zwei Monaten in der unter Buchstabe f Nummer 2 dieses Anhangs vorgegebenen Gliederungstiefe übermittelt. Für Mitgliedstaaten, deren Umsatz in der Abteilung 47 der NACE Rev. 2 im jeweiligen Basisjahr weniger als 3 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, kann die Frist um maximal 15 Tage verlängert werden.

2. Die Variablen zum Umsatz (Nr. 120) und zum Umsatzdeflator/Umsatzvolumen (Nrn. 330/123) werden innerhalb von einem Monate in der unter Buchstabe f Nummer 3 dieses Anhangs vorgegebenen Gliederungstiefe übermittelt. Bei den Variablen zum Umsatz (Nr. 120) und zum Umsatzdeflator/Umsatzvolumen (Nrn. 330/123) können sich die Mitgliedstaaten auch entsprechend der jeweiligen Allokation an einem europäischen Stichprobenplan im Sinne des Artikels 4 Absatz 2 Unterabsatz 1 Buchstabe d beteiligen. Die Einzelheiten der Allokation werden nach dem in Artikel 18 genannten Verfahren festgelegt.

3. Die Variable zur Beschäftigtenzahl wird zwei Monate nach Ende des Bezugszeitraums übermittelt. Für Mitgliedstaaten, deren Umsatz in der Abteilung 47 der NACE Rev. 2 im jeweiligen Basisjahr weniger als 3 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, kann die Frist um maximal 15 Tage verlängert werden.“

3.4. Dem Anhang C Buchstabe i („Erstes Bezugsjahr“) wird folgender Satz angefügt:

„Der erste Bezugszeitraum, für den alle Variablen gemäß der NACE Rev. 2 zu übermitteln sind, ist für monatliche Daten der Januar 2009 und für vierteljährliche Daten das 1. Quartal 2009.“

4. Anhang D

4.1. Anhang D Buchstabe a („Geltungsbereich“) erhält folgende Fassung:

„a) Geltungsbereich

Dieser Anhang gilt für alle Tätigkeiten, die in den Abteilungen 45 und 46 sowie den Abschnitten H bis N und P bis S der NACE Rev. 2 aufgeführt sind.“

4.2. In Anhang D Buchstabe c („Liste der Variablen“) wird unter Nummer 4 Buchstabe d „NACE“ durch „NACE Rev. 2“ ersetzt.

4.3. In Anhang D Buchstabe f („Gliederungstiefe“) erhalten die Nummern 1, 2, 3, 4 und 5 folgende Fassung:

„1. Die Umsatzvariable (Nr. 120) ist in folgenden Gruppierungen der NACE Rev. 2 zu übermitteln:

46 auf der Ebene der Dreisteller;

45, 45.2, 49, 50, 51, 52, 53, 58, 59, 60, 61, 62, 63, 71, 73, 74, 78, 79, 80, 81.2, 82;

Summe von 45.1, 45.3 und 45.4;

Summe von 55 und 56;

Summe von 69 und 70.2;

2. Die Variable zur Beschäftigtenzahl (Nr. 210) ist für folgende Gruppierungen der NACE Rev. 2 zu übermitteln:

Abteilungen 45, 46, 49, 50, 51, 52, 53, 58, 59, 60, 61, 62, 63;

Summe von 69, 70.2, 71, 73 und 74;

Summe von 55 und 56;

Summe von 78, 79, 80, 81.2 und 82.

3. Für die Abteilungen 45 und 46 der NACE Rev. 2 muss die Umsatzvariable von den Mitgliedstaaten, deren Umsatz in diesen Abteilungen der NACE Rev. 2 im jeweiligen Basisjahr weniger als 4 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, nur auf der Ebene der Zweisteller übermittelt werden.

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4. Für die Abschnitte H und J der NACE Rev. 2 muss die Variable zur Beschäftigtenzahl (Nr. 210) von den Mitgliedstaaten, deren Wertschöpfung in den Abschnitten H und J der NACE Rev. 2 im jeweiligen Basisjahr weniger als 4 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, nur auf der Ebene der Abschnitte übermittelt werden.

5. Die Erzeugerpreisvariable (Nr. 310) ist für folgende wirtschaftliche Tätigkeiten und Gruppierungen der NACE Rev. 2 zu übermitteln:

49.4, 51, 52.1, 52.24, 53.1, 53.2, 61, 62, 63.1, 63.9, 71, 73, 78, 80, 81.2;

Summe von 50.1 und 50.2;

Summe von 69.1, 69.2 und 70.2.

Für die Abteilung 78 der NACE Rev. 2 ist der Gesamtpreis der eingestellten Mitarbeiter und des eingesetzten Personals anzugeben."

4.4. In Anhang D Buchstabe f („Gliederungstiefe") erhält Nummer 7 folgende Fassung:

„7. Für die Abteilung 63 der NACE Rev. 2 muss die Erzeugerpreisvariable (Nr. 310) von den Mitgliedstaaten, deren Umsatz in dieser Abteilung der NACE Rev. 2 im jeweiligen Basisjahr weniger als 4 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, nur auf der Ebene der Zweisteller übermittelt werden."

4.5. In Anhang D Buchstabe h („Pilotstudien") erhält Nummer 3 folgende Fassung:

„3. Beurteilung der Durchführbarkeit und Relevanz der Erhebung von Daten über

i) Beteiligungsgesellschaften, Verwaltung und Führung von Unternehmen und Betrieben, Gruppen 64.2 und 70.1 der NACE Rev. 2,

ii) Grundstücks- und Wohnungswesen, Abteilung 68 der NACE Rev. 2,

iii) Forschung und Entwicklung, Abteilung 72 der NACE Rev. 2,

iv) Vermietung von beweglichen Sachen, Abteilung 77 der NACE Rev. 2,

v) Abschnitte K, P, Q, R, S der NACE Rev. 2;"

4.6. Dem Anhang D Buchstabe i („Erster Bezugszeitraum") wird folgender Absatz angefügt:

„Der erste Bezugszeitraum, für den alle Variablen gemäß der NACE Rev. 2 zu übermitteln sind, ist das 1. Quartal 2009."

4.7. Anhang D Buchstabe j („Übergangszeitraum") erhält folgende Fassung:

„j) Übergangszeitraum

Nach dem in Artikel 18 genannten Verfahren kann für die Variable Nr. 310 ein Übergangszeitraum bis spätestens zum 11. August 2008 gewährt werden. Nach dem in Artikel 18 genannten Verfahren kann für die Übermittlung der Variablen Nr. 310 für die Abteilungen 52, 69, 70, 71, 73, 78, 80 und 81 der NACE-Rev. 2 ein weiteres Jahr gewährt werden. Zusätzlich zu diesen Übergangszeiträumen kann den Mitgliedstaaten, deren Umsatz in den unter Buchstabe a ‚Geltungsbereich' aufgeführten Tätigkeiten der NACE Rev. 2 im jeweiligen Basisjahr weniger als 1 % des Gesamtwerts der Europäischen Gemeinschaft ausmacht, nach dem in Artikel 18 genannten Verfahren ein weiterer Übergangszeitraum von einem Jahr gewährt werden."

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ANHANG IV

Anhang I der Verordnung (EG) Nr. 2150/2002 wird wie folgt geändert:

1. Abschnitt 1 erhält folgende Fassung:

„Erfassungsbereich

Die Statistiken sind für die Wirtschaftszweige zu erstellen, die unter die Abschnitte A bis U der NACE Rev. 2 fallen. Diese Abschnitte decken alle Wirtschaftszweige ab.

Dieser Anhang erfasst auch

a) Abfälle aus Haushalten,

b) Abfälle, die bei den Verfahren der Abfallverwertung und/oder -beseitigung entstehen."

2. Abschnitt 8 Nummer 1.1 erhält folgende Fassung:

„1.1. Die folgenden Abschnitte, Abteilungen, Gruppen und Klassen der NACE Rev. 2:

Nummer des Postens	NACE-Rev.-2-Kode	Bezeichnung
1	Abteilung 01	Landwirtschaft, Jagd und damit verbundene Tätigkeiten
	Abteilung 02	Forstwirtschaft und Holzeinschlag
2	Abteilung 03	Fischerei und Aquakultur
3	Abschnitt B	Bergbau und Gewinnung von Steinen und Erden
4	Abteilung 10	Herstellung von Nahrungs- und Futtermitteln
	Abteilung 11	Getränkeherstellung
	Abteilung 12	Tabakverarbeitung
5	Abteilung 13	Herstellung von Textilien
	Abteilung 14	Herstellung von Bekleidung
	Abteilung 15	Herstellung von Leder, Lederwaren und Schuhen
6	Abteilung 16	Herstellung von Holz-, Flecht-, Korb- und Korkwaren (ohne Möbel)
7	Abteilung 17	Herstellung von Papier, Pappe und Waren daraus
	Abteilung 18	Herstellung von Druckerzeugnissen; Vervielfältigung von bespielten Ton-, Bild- und Datenträgern
8	Abteilung 19	Kokerei und Mineralölverarbeitung
9	Abteilung 20	Herstellung von chemischen Erzeugnissen
	Abteilung 21	Herstellung von pharmazeutischen Erzeugnissen
	Abteilung 22	Herstellung von Gummi- und Kunststoffwaren
10	Abteilung 23	Herstellung von Glas und Glaswaren, Keramik, Verarbeitung von Steinen und Erden
11	Abteilung 24	Metallerzeugung und -bearbeitung
	Abteilung 25	Herstellung von Metallerzeugnissen
12	Abteilung 26	Herstellung von Datenverarbeitungsgeräten, elektronischen und optischen Erzeugnissen
	Abteilung 27	Herstellung von elektrischen Ausrüstungen
	Abteilung 28	Maschinenbau
	Abteilung 29	Herstellung von Kraftwagen und Kraftwagenteilen
	Abteilung 30	Sonstiger Fahrzeugbau
13	Abteilung 31	Herstellung von Möbeln
	Abteilung 32	Herstellung von sonstigen Waren
	Abteilung 33	Reparatur und Installation von Maschinen und Ausrüstungen
14	Abschnitt D	Energieversorgung
15	Abteilung 36	Wasserversorgung

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Nummer des Postens	NACE-Rev.-2-Kode	Bezeichnung
	Abteilung 37	Abwasserentsorgung
	Abteilung 39	Beseitigung von Umweltverschmutzungen und sonstige Entsorgung
16	Abteilung 38	Sammlung, Behandlung und Beseitigung von Abfällen; Rückgewinnung
17	Abschnitt F	Baugewerbe/Bau
18		Dienstleistungen:
	Abschnitt G außer 46.77	Handel; Instandhaltung und Reparatur von Kraftfahrzeugen
	Abschnitt H	Verkehr und Lagerei
	Abschnitt I	Gastgewerbe/Beherbergung und Gastronomie
	Abschnitt J	Information und Kommunikation
	Abschnitt K	Erbringung von Finanz- und Versicherungsdienstleistungen
	Abschnitt L	Grundstücks- und Wohnungswesen
	Abschnitt M	Erbringung von freiberuflichen, wissenschaftlichen und technischen Dienstleistungen
	Abschnitt N	Erbringung von sonstigen wirtschaftlichen Dienstleistungen
	Abschnitt O	Öffentliche Verwaltung, Verteidigung; Sozialversicherung
	Abschnitt P	Erziehung und Unterricht
	Abschnitt Q	Gesundheits- und Sozialwesen
	Abschnitt R	Kunst, Unterhaltung und Erholung
	Abschnitt S	Erbringung von sonstigen Dienstleistungen
	Abschnitt T	Private Haushalte mit Hauspersonal; Herstellung von Waren und Erbringung von Dienstleistungen durch private Haushalte für den Eigenbedarf ohne ausgeprägten Schwerpunkt
	Abschnitt U	Exterritoriale Organisationen und Körperschaften
19	Klasse 46.77	Großhandel mit Altmaterialien und Reststoffen“

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ANHANG V

Anhang I Buchstabe b der Verordnung (EG) Nr. 808/2004 erhält folgende Fassung:

„b) Erfassungsbereich

In diesem Modul werden die wirtschaftlichen Tätigkeiten der Abschnitte C bis N und des Abschnitts R sowie der Abteilung 95 der statistischen Systematik der Wirtschaftszweige in der Europäischen Gemeinschaft (NACE Rev. 2) erfasst. Wenn vorherige Pilotstudien erfolgreich verlaufen, wird auch Abschnitt K erfasst.

Die Statistiken werden für Unternehmenseinheiten erstellt."

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