COMMISSION DELEGATED REGULATION (EU) …/...

of XXX

amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the application date for the disclosure requirements of certain undertakings

EXPLANATORY MEMORANDUM

1. CONTEXT OF THE DELEGATED ACT

In his report on ‘The Future of European Competitiveness’[1], Mario Draghi emphasised the need for Europe to create a regulatory landscape which facilitates competitiveness and resilience, drawing attention to burden and compliance costs created by the Corporate Sustainability Reporting Directive (CSRD)[2] amongst other pieces of legislation. In the Budapest Declaration on the New European Competitiveness Deal[3], EU Heads of State and Government called for ‘a simplification revolution, ensuring a clear, simple and smart regulatory framework for businesses and drastically reducing administrative, regulatory and reporting burdens, in particular for SMEs’. They called on the Commission to make concrete proposals to reduce reporting requirements by at least 25 % in the first half of 2025.

In its Communication entitled “A Competitiveness Compass for the EU”[4], the Commission confirmed that it would propose a first ‘Simplification Omnibus package’, which would include far-reaching simplification in the fields of sustainable finance reporting, sustainability due diligence and taxonomy. In its Communication entitled ‘A simpler and faster Europe: Communication on implementation and simplification’[5], the Commission set out an implementation and simplification agenda that delivers fast and visible improvements for people and business on the ground, requiring more than an incremental approach and underlining the need for bold action to streamline and simplify EU, national and regional rules.

The CSRD entered into force on 5 January 2023. It strengthened and modernised corporate sustainability reporting requirements through modifications to the Accounting Directive[6], the

[1] “The future of European competitiveness”, September 2024.

[2] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (OJ L 322, 16.12.2022, p. 15, ELI: http://data.europa.eu/eli/dir/2022/2464/oj).

[3] Budapest Declaration on the New European Competitiveness Deal, 8 November 2024.

[4] Communication from the Commission to the European Parliament, the European council, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2025) 30 final: A Competitiveness Compass for the EU.

[5] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2025) 47 final: A simpler and faster Europe: Communication on implementation and simplification.

[6] 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 (OJ L 182, 29.6.2013, p. 19, ELI: http://data.europa.eu/eli/dir/2013/34/oj).

Transparency Directive[7], the Audit Directive[8] and the Audit Regulation[9]. The CSRD is an important element of the European Green Deal[10] and of the Sustainable Finance Action Plan[11]. It aims to ensure that investors have the information they need to understand and manage the risks to which investee companies are exposed from climate change and other sustainability issues. It also aims to ensure that investors and other stakeholders have the information they need about the impacts of companies on people and the environment. It thereby contributes to financial stability and environmental integrity. This is a necessary condition for financial resources to flow to companies that pursue sustainability goals and creates more accountability and transparency towards all stakeholders regarding companies' sustainability performance.

The CSRD requires undertakings in scope to report sustainability information according to mandatory European Sustainability Reporting Standards (ESRS) and requires the Commission to adopt such standards through delegated acts. In July 2023 the Commission adopted a first set of ESRS which are sector-agnostic, meaning they are to be applied by all undertakings in scope independently of the sector of the economy in which the undertaking operates.[12]

To help companies adjust to the new reporting regime, the first set of ESRS specifies that some of the reporting requirements are phased-in over time[13]. This means that some information that undertakings must report only needs to be reported as from the second or third year that they apply the standards. Some of these phase-in provisions apply to all undertakings in scope of the CSRD and some apply only to undertakings in scope that have up to 750 employees.

The CSRD is currently scheduled to apply to large undertakings, SMEs with securities listed on the EU regulated markets, parent undertakings of large groups, as well as to issuers that belong to these categories of undertakings. The entry into application of the reporting requirements introduced by the CSRD is phased in according to different categories of undertakings. In the first wave, large public interest entities with more than 500 employees must report for the first time in 2025 for financial year 2024.[14] In the second wave, other large

[7] Directive 2004/109/EC of the European Parliament and of the Council of 15 December 2004 on the harmonisation of transparency requirements in relation to information about issuers whose securities are admitted to trading on a regulated market and amending Directive 2001/34/EC (*OJ L 390, 31.12.2004, p. 38*, ELI: http://data.europa.eu/eli/dir/2004/109/oj)

[8] Directive 2006/43/EC of the European Parliament and of the Council of 17 May 2006 on statutory audits of annual accounts and consolidated accounts, amending Council Directives 78/660/EEC and 83/349/EEC and repealing Council Directive 84/253/EEC (OJ L 157, 9.6.2006, p. 87, ELI: http://data.europa.eu/eli/dir/2006/43/oj).

[9] Regulation (EU) No 537/2014 of the European Parliament and of the Council of 16 April 2014 on specific requirements regarding statutory audit of public-interest entities and repealing Commission Decision 2005/909/EC (*OJ L 158, 27.5.2014, p. 77*, ELI: http://data.europa.eu/eli/reg/2014/537/oj).

[10] Communication from the Commission, 'The European Green Deal, COM(2019) 640 final.

[11] Communication from the Commission 'Action Plan: Financing Sustainable Growth', COM/2018/097 final.

[12] Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (OJ L, 2023/2772, 22.12.2023, ELI: http://data.europa.eu/eli/reg_del/2023/2772/oj).

[13] The list of phasing-ins is presented in Appendix C of ESRS 1, in Annex I of Commission Delegated Regulation (EU) 2023/2772.

[14] As well as public-interest entities that are parent undertakings of a large group with more than 500 employees, for consolidated sustainability reporting. "Public-Interest Entities" are defined by Article 2 point (1) of the Accounting Directive as undertakings that are: (a) governed by the law of a Member State and whose transferable securities are admitted to trading on an EU regulated market; (b) credit institutions; (c) insurance undertakings; or (d) designated by Member States as public-interest entities. "Large undertakings" are defined by Article 3(4) of the Accounting Directive as undertakings which on their balance sheet dates exceed at least two of the three following criteria: (a) balance sheet total: EUR 25 000 000; (b) net turnover: EUR 50 000 000; (c) average number of employees during the financial year: 250.

undertakings must report in 2026 for financial year 2025.[15] In the third wave, SMEs with securities listed in EU regulated markets must report in 2027 for financial year 2026, although they have a possibility to opt out of reporting for financial years 2026 and 2027.[16] In the fourth wave, certain non-EU undertakings that have business in the territory of the Union above certain thresholds must report in 2029 for financial year 2028.[17]

The CSRD is now being implemented in a new and difficult context. Russia's war of aggression against Ukraine has driven up energy prices for EU undertakings. Trade tensions are rising as the geopolitical landscape continues to shift. The different approach undertaken by some other major jurisdictions regarding the regulation of corporate sustainability reporting and due diligence raises questions about the effects of these laws on the competitive positioning of EU companies. The ability of the Union to preserve and protect its values depends amongst other things on the capacity of its economy to adapt and compete in an unstable and sometimes hostile geopolitical context.

On 26 February the Commission therefore adopted a package of so-called "omnibus" proposals designed to reduce the administrative burden on undertakings and to boost growth and investment. This included a proposal[18] to modify the substantive provisions of the CSRD as well as the Corporate Sustainability Due Diligence Directive (CSDDD)[19]. In the case of the CSRD, the proposed modifications include applying the reporting requirements only to large undertaking with more than 1000 employees, thereby reducing the number of undertakings subject to the requirements by about 80%.

At the same time, the Commission made a commitment to adopt a delegated act that revises and simplifies the first set of ESRS. This revision will, amongst other things, substantially reduce the number of datapoints to be reported, provide clearer instructions on how to apply the materiality principle and simplify the structure and presentation of the standards. The Commission aims to adopt the necessary delegated act as soon as possible, and at the latest six months after the entry into force of the directive amending the substantive provisions of the CSRD.

The "omnibus" proposal also included a separate legislative proposal which postpones by two years the entry into application of the CSRD reporting requirements for undertakings in the second wave and third wave (so-called "stop-the-clock" proposal).[20] Further to agreement between the European Parliament and the Council to adopt the Commission's proposal without significant modifications, the amending directive entered into force on [insert date].[21]

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[15] As well as the other parent undertakings of large groups, for consolidated sustainability reporting.
[16] Small and non-complex credit institutions, and captive insurance and reinsurance undertakings, are also part of the third wave, although they may only use the additional two-year opt-out if they are listed SMEs.
[17] According to article 40a of the Accounting Directive, as amended by the CSRD, an undertaking not established in the EU must report sustainability information at the group level if it a) generates over EUR 150 million in the Union and b) has either a subsidiary in the EU that is subject to the sustainability reporting requirements introduced by the CSRD or has an EU branch that generated over EUR 40 million. In this case, the legal obligation to publish the report falls on the EU subsidiary or branch.
[18] Proposal for a Directive of the European Parliament and of the Council amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements (COM(2025) 81 final).
[19] Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (OJ L, 2024/1760, 5.7.2024, ELI: http://data.europa.eu/eli/dir/2024/1760/oj).
[20] Proposal for a Directive of the European Parliament and of the Council amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements (COM(2025) 80 final).
[21] [Add reference to amending stop-the-clock directive when published in OJ].

The stop-the-clock Directive does not postpone the reporting requirements for undertakings in the so-called wave one, which are required to report in 2025 information regarding financial year 2024. According to the Commission's proposal to modify the substantive provisions of the CSRD, some wave one companies would in future no longer be subject to the reporting requirements. The stop-the-clock directive does not postpone the reporting requirements for such undertakings in order not to prejudge the outcome of the legislative negotiations between the European parliament and the Council on the Commission's proposal to modify the substantive provisions of the CSRD, in particular the provisions setting out which companies will in future be subject to the reporting requirements.

In this new context, the phase-in provisions contained in the existing ESRS create two problems. Firstly, undertakings that would no longer be subject to the reporting requirements according to the Commission's proposal will nevertheless first have to report additional information for financial years 2025 and 2026. It is not considered reasonable to require undertakings to report additional information when there is a realistic prospect that they will subsequently not have to report any information. Secondly, wave one undertakings will have to meet the additional reporting requirements for financial years 2025 and 2026 even though the revised and simplified ESRS might subsequently modify those same requirements.

The best means of addressing these problems is to effectively freeze the ESRS reporting requirements for wave one undertakings as they are for the first year of application of the standards. This delegated act therefore postpones by two years the additional reporting requirements that undertakings in wave one would otherwise have to meet for financial years 2025 and 2026. By the time that undertakings have to report for financial year 2027, it is expected that the overall revision and simplification of ESRS will have been completed, and that the Directive amending the substantive provisions of the CSRD, including the provisions setting out which undertakings are subject to the reporting requirements, will have entered into force.

2. CONSULTATIONS PRIOR TO THE ADOPTION OF THE ACT

On [insert date] the Commission consulted Member States on this draft delegated act during a joint meeting of the Member States' Expert Group on Sustainable Finance and the Accounting Regulatory Committee.[22]

3. LEGAL ELEMENTS OF THE DELEGATED ACT

This delegated act is based on Article 29b(1), first subparagraph, of Directive 2013/34/EU (Accounting Directive).

It amends Delegated Regulation (EU) 2023/2772 on the first set of European Sustainability Reporting Standards (ESRS) by replacing Appendix C of ESRS 1 within Annex I of that Delegated Regulation.

This amendment allows undertakings required to report on sustainability from financial year 2024 (undertakings in so-called wave one) not to report the following sustainability information until financial year 2027 (instead of until financial year 2025 or 2026):

– the information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects);

[22] As required by Article 49(3b), fourth subparagraph, of the Accounting Directive.

- the datapoints on scope 3 emissions and total GHG emissions, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable);
- the information prescribed by ESRS E1-9;
- the information prescribed by ESRS E2-6;
- the information prescribed by ESRS E3-5;
- the information specified in the disclosure requirements of ESRS E4, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable);
- the information prescribed by ESRS E4-6;
- the information prescribed by ESRS E5-6;
- the information specified in the disclosure requirements of ESRS S1, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable);
- all datapoints in ESRS S1-7;
- the information prescribed by ESRS S1-8;
- the information prescribed by ESRS S1-11;
- the information prescribed by ESRS S1-12;
- the information prescribed by ESRS S1-13;
- the data points on cases of work-related ill-health and on number of days lost to injuries, accidents, fatalities and work-related ill health in ESRS S-14;
- the information related to non-employees in ESRS S-14;
- the information prescribed by ESRS S1-15;
- all disclosure requirements in ESRS S2, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable);
- all disclosure requirements in ESRS S3, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable);
- all disclosure requirements in ESRS S4, for undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable).

The new Appendix C of ESRS 1 shall apply from 1 January 2025 for financial years beginning on or after 1 January 2025.

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(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to 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 ([23]), and in particular Article 29b(1), first subparagraph, thereof,

Whereas:

(1) On 31 July 2023, the Commission adopted Delegated Regulation (EU) 2023/2772 ([24]) to supplement Directive 2013/34/EU as regards the first set of European Sustainability Reporting Standards (ESRS).

(2) Delegated Regulation (EU) 2023/2772 allows certain undertakings not to report certain sustainability information for the first years of application. The list of these phased-in disclosure requirements is included in Appendix C of ESRS 1, within Annex I of that Delegated Regulation.

(3) On 26 February 2025, the Commission adopted the Omnibus Simplification package ([25]), which proposes – inter alia – a number of amendments to the sustainability reporting requirements introduced by Directive (EU) 2022/2464 of the European Parliament and of the Council[26]. In particular, the Commission proposes to reduce the number of undertakings subject to the sustainability reporting requirements. According to the Commission’s proposal, only large undertakings with more than 1000 employees would remain subject to the requirement to report sustainability information.

(4) As part of the Omnibus Simplification package the Commission also proposed to postpone the entry into application of the reporting requirements for those

[23] OJ L 182, 29.6.2013, p. 19, ELI: http://data.europa.eu/eli/dir/2013/34/oj.

[24] Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (OJ L, 2023/2772, 22.12.2023, ELI: http://data.europa.eu/eli/reg_del/2023/2772/oj).

[25] Proposal for a Directive of the European Parliament and of the Council amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements, Brussels, 26.2.2025 COM (2025) 81 final.

[26] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (OJ L 322, 16.12.2022, p. 15, ELI: http://data.europa.eu/eli/dir/2022/2464/oj).

undertakings that would have to report for the first time for financial years 2025 and 2026 (so-called "stop-the-clock" proposal).[27] The stop-the-clock proposal did not propose to postpone the entry into application of the reporting requirements for undertakings that have to report for the first time financial year 2024, in order not to prejudge the outcome of the legislative negotiations between the European Parliament and the Council on the Commission's proposal to amend the sustainability reporting requirements introduced by Directive (EU) 2022/2464, in particular the provisions setting out which companies will in future be subject to the reporting requirements. Further to agreement between the European and Council to adopt the Commission's proposal without significant modifications, the amending Directive entered into force on [insert date].

(5) Because of the phased-in disclosure requirements in the existing ESRS, undertakings that are required to report on sustainability from financial year 2024 but that would no longer be subject to the reporting requirements according to the Commission's proposal, will nevertheless first have to report additional information for financial years 2025 and 2026. It is not considered reasonable to require undertakings to report additional information when there is a realistic prospect that they will subsequently not have to report any information. In addition, undertakings that are required to report on sustainability from financial year 2024 will have to meet additional reporting requirements for financial years 2025 and 2026 even though the revised and simplified ESRS might subsequently modify those same requirements.

(6) Therefore, the Commission considers it necessary to allow undertakings that are required to report on sustainability from financial year 2024 not to report until financial year 2027 the additional information that ESRS would currently require them to report for financial years 2025 and 2026.

(7) In accordance with Article 29b(1), fifth subparagraph, of Directive 2013/34/EU, this Regulation should not enter into force earlier than 4 months after its adoption by the Commission. Considering that Appendix C of ESRS 1 in Annex 1 of Delegated Regulation (EU) 2023/2772 requires undertakings reporting on sustainability from financial year 2024 to report additional information from financial years 2025, this Regulation should enter into force on the third day following that of its publication in the Official Journal of the European Union.

(8) On [insert date] the Commission consulted Member States on this draft delegated act during a joint meeting of the Member States' Expert Group on Sustainable Finance and the Accounting Regulatory Committee, in accordance with the requirements of Article 49(3b), third subparagraph, of Directive 2013/34/EU,

HAS ADOPTED THIS REGULATION:

Article 1

Subject matter

In Annex I to Delegated Regulation (EU) 2023/2772, Appendix C of ESRS 1 is replaced by the text in the Annex to this Regulation.

[27] Proposal for a Directive of the European Parliament and of the Council amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements (COM(2025) 80 final).

Article 2

Entry into force and application

This Regulation shall enter into force on the third day following that of its publication in the *Official Journal of the European Union*.

It shall apply for financial years beginning on or after 1 January 2025.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission
The President
Ursula VON DER LEYEN

Appendix C

List of phased-in Disclosure Requirements

This appendix is an integral part of ESRS 1 and has the same authority as the other parts of the Standard.

ESRS	Disclosure Requirement	Full name of the Disclosure Requirement	Phase-in or effective date (including the first year)
ESRS 2	SBM-1	Strategy, business model and value chain	The undertaking shall report the information prescribed by ESRS 2 SBM-1 paragraph 40(b) (breakdown of total revenue by significant ESRS sector) and 40(c) (list of additional significant ESRS sectors) starting from the application date specified in a Commission Delegated Act to be adopted pursuant to article 29b(1) third subparagraph, point (ii), of Directive 2013/34/EU.
ESRS 2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	The undertaking may omit the information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects) for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects) for the first 3 years of preparation of its sustainability statement.** The undertaking may comply with ESRS 2 SBM-3 paragraph 48(e) by reporting only qualitative disclosures for the first 3 years of preparation of its sustainability statement, if it is impracticable to prepare quantitative disclosures.
ESRS E1	E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the

			financial year (on a consolidated basis where applicable) may omit the datapoints on scope 3 emissions and total GHG emissions for the first year of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the datapoints on scope 3 emissions and total GHG emissions for the first 3 years of preparation of their sustainability statement.**
ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	The undertaking may omit the information prescribed by ESRS E1-9 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS E1-9 for the first 3 years of preparation of its sustainability statement.** The undertaking may comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of its sustainability statement, if it is impracticable to prepare quantitative disclosures.
ESRS E2	E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	The undertaking may omit the information prescribed by ESRS E2-6 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive**

			(EU) 2022/2464 may omit the information prescribed by ESRS E2-6 for the first 3 years of preparation of its sustainability statement. Except for the information prescribed by paragraph 40 (b) on the operating and capital expenditures occurred in the reporting period in conjunction with major incidents and deposits, the undertaking may comply with ESRS E2-6 by reporting only qualitative disclosures, for the first 3 years of preparation of its sustainability statement.
ESRS E3	E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	The undertaking may omit the information prescribed by ESRS E3-5 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS E3-5 for the first 3 years of preparation of its sustainability statement.** The undertaking may comply with ESRS E3-5 by reporting only qualitative disclosures, for the first 3 years of preparation of its sustainability statement.
ESRS E4	All disclosure requirements	All disclosure requirements	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable) may omit the information specified in the disclosure requirements of ESRS E4 for the first 2 years of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding**

			on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the information specified in the disclosure requirements of ESRS E4 for the first 3 years of preparation of their sustainability statement.
ESRS E4	E4-6	Anticipated financial effects from biodiversity and ecosystem-related impacts, risks and opportunities	The undertaking may omit the information prescribed by ESRS E4-6 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS E4-6 for the first 3 years of preparation of its sustainability statement.** The undertaking may comply with ESRS E4-6 by reporting only qualitative disclosures, for the first 3 years of preparation of its sustainability statement.
ESRS E5	E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	The undertaking may omit the information prescribed by ESRS E5-6 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS E5-6 for the first 3 years of preparation of its sustainability statement.** The undertaking may comply with ESRS E5-6 by reporting only qualitative disclosures, for the first 3 years of preparation of its sustainability statement.
ESRS S1	All disclosure requirements	All disclosure requirements	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the

			financial year (on a consolidated basis where applicable) may omit the information specified in the disclosure requirements of ESRS S1 for the first year of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the information specified in the disclosure requirements of ESRS S1 for the first 3 years of preparation of their sustainability statement.**
ESRS S1	S1-7	Characteristics of non-employee workers in the undertaking's own workforce	The undertaking may omit reporting for all datapoints in this Disclosure Requirement for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit reporting for all datapoints in this Disclosure Requirement for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-8	Collective bargaining coverage and social dialogue	The undertaking may omit this Disclosure Requirement with regard to its own employees in non-EEA countries for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit this Disclosure Requirement with regard to**

			its own employees in non-EEA countries for the first 3 years of preparation of its sustainability statement.
ESRS S1	S1-11	Social protection	The undertaking may omit the information prescribed by ESRS S1-11 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS S1-11 for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-12	Percentage of employees with disabilities	The undertaking may omit the information prescribed by ESRS S1-12 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS S1-12 for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-13	Training and skills development	The undertaking may omit the information prescribed by ESRS S1-13 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS S1-13 for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-14	Health and safety	The undertaking may omit the data points on cases of work-related ill-health and on number of days lost to injuries, accidents,

			fatalities and work-related ill health for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the data points on cases of work-related ill-health and on number of days lost to injuries, accidents, fatalities and work-related ill health for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-14	Health and safety	The undertaking may omit reporting on non-employees for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit reporting on non-employees for the first 3 years of preparation of its sustainability statement.**
ESRS S1	S1-15	Work-life balance	The undertaking may omit the information prescribed by ESRS S1-15 for the first year of preparation of its sustainability statement. **By way of derogation from the first sentence, an undertaking referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 may omit the information prescribed by ESRS S1-15 for the first 3 years of preparation of its sustainability statement.**
ESRS S2	All disclosure requirements	All disclosure requirements	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable) may omit the

			information specified in the disclosure requirements of ESRS S2 for the first 2 years of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the information specified in the disclosure requirements of ESRS S2 for the first 3 years of preparation of their sustainability statement.**
ESRS S3	All disclosure requirements	All disclosure requirements	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable) may omit the information specified in the disclosure requirements of ESRS S3 for the first 2 years of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the information specified in the disclosure requirements of ESRS S3 for the first 3 years of preparation of their sustainability statement.**
ESRS S4	All disclosure requirements	All disclosure requirements	Undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis

			where applicable) may omit the information specified in the disclosure requirements of ESRS S4 for the first 2 years of preparation of their sustainability statement. **By way of derogation from the first sentence, undertakings referred to in Article 5(2), first subparagraph, point (a), and third subparagraph, point (a) of Directive (EU) 2022/2464 not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis, where applicable) may omit the information specified in the disclosure requirements of ESRS S4 for the first 3 years of preparation of their sustainability statement.**