Deloitte.

Beyond compliance:

Enhancing trust through reporting

Observations on practices following Wave 1 of CSRD reporting

August 2025

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Executive summary

The implementation of the Corporate Sustainability Reporting Directive (CSRD) marked an important moment for businesses in the EU and beyond, transitioning sustainability reporting to mandatory standardized disclosures. This report, based on an analysis of 200 Wave 1 CSRD reporters across many industries and geographies, reveals both the strategic opportunities and challenges.

For many of the organizations that reported in the first wave, mandatory reporting is not a starting point but a continuation of an ongoing journey. These companies have been developing sustainability strategies, setting targets, and embedding sustainability principles into their business models for many years. Mandatory reporting under sustainability standards further formalized and codified these efforts—bringing greater consistency, comparability, and assurance to existing practices.

On the whole, most reporting organizations (reporters) found the transition to mandatory reporting under the CSRD more demanding than anticipated, highlighting the need for robust data management systems, cross-functional collaboration, and a cultural shift toward integrating sustainability into core business operations.

Veronica Poole
Deloitte Global IFRS and
Corporate Reporting leader

"It is essential that companies identify the material matters, including impacts, risks and opportunities, that drive risk and value for the business. By integrating them into governance, strategy, and decision-making, companies can focus on the factors that underpin long-term resilience and advance a sustainable business and explain them clearly to providers of financial capital. These matters should form the core of a global reporting process that can be scaled through integrated teams to meet different mandatory reporting requirements around the world, including those that require reporting to broader stakeholders in addition to investors."

Early adopters are going further, leveraging mandatory sustainability reporting as a catalyst for innovation and differentiation. In particular, identification of sustainability impacts, risks and opportunities (IROs) and double materiality assessments (DMA) are emerging as strategic tools. These tools help organizations align sustainability efforts with risk management and growth opportunities, while carefully managing stakeholder expectations.

Deloitte Global's analysis evaluates CSRD reporting practices across five industries—Financial Services; Consumer; Technology, Media and Telecommunications (TMT); Energy, Resources and Industrials (ER&I); and Life Sciences and Health Care (LSHC)—and highlights industry-specific trends, challenges, and areas of opportunity.

Julien Rivals
Deloitte Global Audit &
Assurance Sustainability leader

"This year marked a significant milestone in sustainability reporting with the implementation of the CSRD for the first wave of reporters, presenting numerous challenges and complexities for businesses.

It is important to extract key insights and leading practices from Wave 1 to create a more streamlined and simplified approach moving forward. While companies need to meet mandatory reporting requirements, there is an opportunity for reporting companies to leverage them as a strategic tool to gain insight to support a sustainable transition."

Insights and key recommendations include prioritizing DMA integration with strategy and risk management, setting ambitious and dynamic targets linked to supportable actions, fostering collaboration, building a strong foundation of sustainability data, and engaging proactively with stakeholders across the value chain.

This report demonstrates that mandatory sustainability reporting is not just a compliance requirement, but can be a strategic lever for long-term value creation, risk mitigation, and competitive advantage.

Introduction

The current state

The CSRD has moved sustainability reporting to mandatory standardized disclosures on sustainability IROs across the EU and beyond. While for some organizations this represented a further formalization of practices that have been evolving for many years, for others it can initiate a pivot in how IROs are managed. While the CSRD's purpose is to enhance transparency and comparability, many organizations are leveraging the inputs and outcomes to inform strategic decision-making.

However, the EU's approach to sustainability regulation is evolving. In early 2025, the European Commission proposed reforms to simplify reporting and reduce burden, highlighting a shift toward more proportionate regulation. The accompanying revision underway of the European Sustainability Reporting Standards (ESRS) reflects this changing landscape. A more detailed analysis of these developments is included later in this report.

Deloitte Global provides an analysis of 200 CSRD reports from this first wave of CSRD reporters, focused on evaluating reporting practices and trends across industries, including what were identified as material topics in each industry and how those material topics were addressed. The CSRD reports analyzed were selected to provide a balanced representation of larger entities across various industries and geographies. A more detailed methodology is provided in the appendices.

Jeff Schwartz
Deloitte Global Non-Financial Reporting Disclosures co-leader

"The CSRD represents a pivotal shift, with mandatory disclosure and assurance driving transparency and accountability in sustainability reporting. For organizations willing to embrace this change, sustainability reporting becomes more than a requirement—it can be a catalyst for innovation, resilience, and trust."

This report includes key recommendations and actions, further enriched by insights from Deloitte leaders supporting organizations globally on their sustainability reporting. Select industry research was also used to inform some key industry observations, illustrating how organizations are using mandatory reporting to develop a strategic advantage in an increasingly interconnected business environment. Findings include practical and scalable suggestions, especially for those organizations preparing for the second wave of reporting.

Initial reflections

Many leading organizations have been reporting on, and integrating sustainability into decision-making for years, referencing international frameworks such as the Global Reporting Initiative (GRI), the guidance of the Task Force on Climate-related Financial Disclosures (TCFD), or the International Integrated Reporting Framework. For these organizations, CSRD is not a beginning, but the next chapter in a long-standing journey of responsible business.

Other organizations have found the transition to CSRD reporting more demanding than anticipated. Integrating sustainability and financial data, building processes, and coordinating data collection efforts across business functions can require significant investment and cultural change.[1] Fine-tuning new ways of working has also proven challenging. Deloitte practitioners observed that the organizations that proactively embrace these challenges are already discovering that a robust response to mandatory sustainability reporting can help unlock new avenues for innovation and differentiation. For example, proactively identifying IROs stands out as a strategic tool. When done well, the DMA can enable organizations to identify and prioritize the sustainability topics that are most relevant to both their business and stakeholders and help them advance their sustainability transformation.

Through working with organizations, Deloitte practitioners have observed that technology and data are at the heart of high-quality, scalable reporting. While investments in digital tools and automation continue to play a role, many organizations are focused on leveraging existing composable IT architectures to support more efficient reporting. This involves taking stock of the data and systems they already have in place, and finding ways to extract more value by using streamlined tools and innovative approaches that help translate data into action. This approach acknowledges that organizations can face constraints in funding large-scale technology transformations for sustainability purposes. As a result, balancing new investments with smarter use of existing infrastructure has become important.

Responding to mandatory sustainability reporting can also foster a culture of transparency, agility, change management and continuous improvement. Transparent disclosures and proactive stakeholder engagement can build trust and credibility, with ambitious targets helping to drive progress.

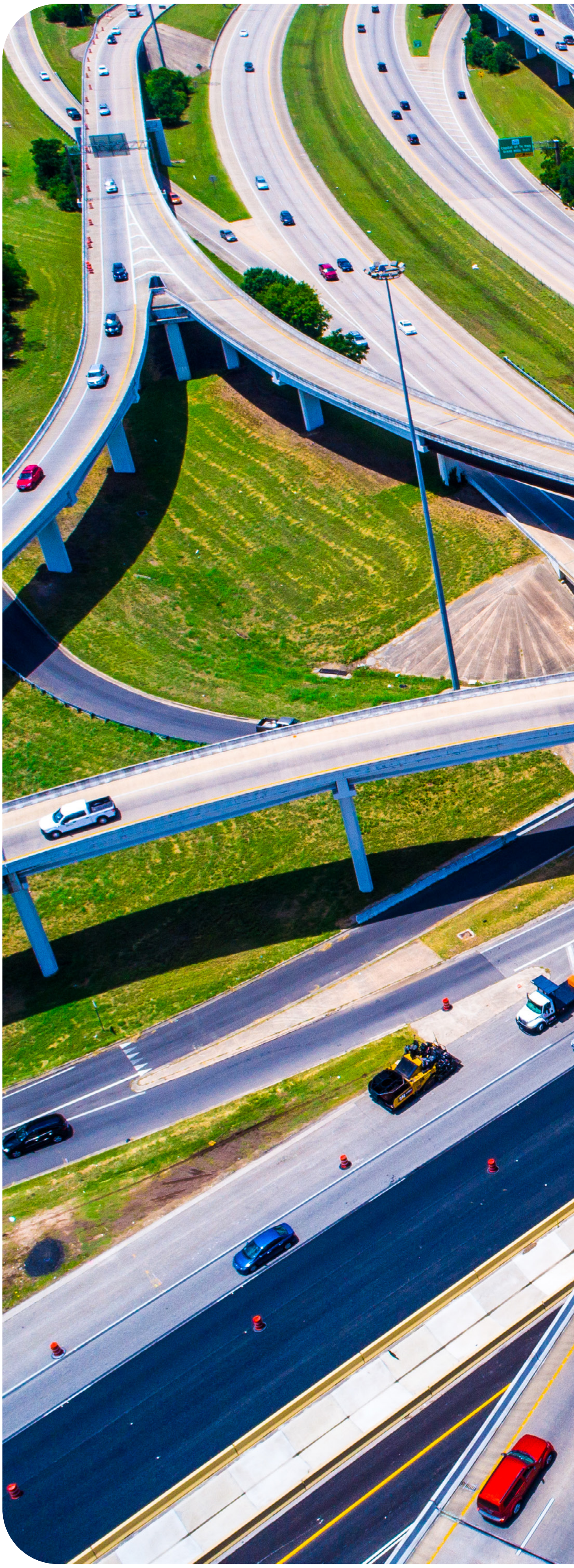
Laurent Vandendooren
Deloitte Global Non-Financial Reporting Disclosures co-leader

"The CSRD establishes a framework for corporate sustainability reporting, creating important transparency for both internal and external stakeholders. It also compels organizations to make meaningful progress on their actions and programs to become a more sustainable business."

Important insights

Meeting mandatory sustainability reporting requirements can also bring an important strategic opportunity. By adopting a structured and robust approach to sustainability data collection, organizations can unlock powerful insights. When combined with the capabilities of Generative Artificial Intelligence (AI), this data can become a force multiplier, helping to empower leaders to make smarter decisions, plan more effectively, and adapt to new ways of working with greater agility.

Regulatory reporting can serve as a catalyst for global business transformation, helping forward-looking organizations thrive in an increasingly uncertain and rapidly evolving world. It can also foster greater corporate accountability by requiring transparency on sustainability IROs across value chains. By integrating these considerations into broader business strategy, governance, operations, and data management, organizations are empowered to proactively identify risks, clarify priorities, and embed sustainability into their core business strategy. This can help increase resilience, and drive strategic transformation, innovation, stakeholder trust and competitive differentiation.



An evolving regulatory landscape

Simplifying mandatory sustainability reporting in the EU

The sustainability reporting landscape in the EU is undergoing a significant transformation, particularly with the implementation of the CSRD and its accompanying ESRS. This shift reflects the European Commission (EC) Competitiveness Compass, which outlines its strategic priorities for the next five years and aligns with the broader recommendations made in the *Draghi report*[2] on European competitiveness, published in 2024.

In February 2025, the EC proposed several legislative changes known as the Omnibus proposals, aimed at significantly reducing the sustainability and due diligence reporting burden for organizations. These proposals include narrowing the scope of entities required to apply the CSRD and revising the first set of ESRS. The revisions are intended to reduce the number of data points that organizations are required to report, clarify ambiguous provisions, and improve consistency with other pieces of legislation. On 31 July 2025 EFRAG (formerly known as the European Financial Reporting Advisory Group) published revised and simplified Exposure Drafts of ESRS, open for public consultation until 29 September 2025.[3]

Following the consultation period, EFRAG will consider stakeholder feedback and deliver its technical advice to the EC by 30 November 2025.[4] The EC will consider EFRAG's technical advice when adopting the proposed delegated act that amends the ESRS, with the intent that the revised standards will be effective for financial year 2027, potentially with an option for voluntary application for financial year 2026.

Furthermore, legislation has been passed to postpone the application of existing CSRD reporting requirements by two years, deferring Wave 2 reporting to financial year 2027 and Wave 3 reporting to financial year 2028. Additionally, on 11 July 2025, the EC adopted a 'Quick-Fix' Delegated Act that, once it is effective, allows organizations that are already reporting under ESRS to maintain the same level of reporting applied in financial year 2024 also for financial years 2025 and 2026, and extends some reliefs that were previously available to companies with fewer than 750 employees to all companies.[5]

Opportunity to align sustainability and business performance

While regulatory requirements are still being revised and finalized, organizations have an opportunity to strengthen internal capabilities, invest in more reliable sustainability data systems, and build robust processes and controls including those required for assurance readiness. They should also consider how best to align sustainability efforts with business strategy and performance management in response to evolving market expectations, which continue to grow in complexity. Maintaining momentum during this transitional period is key. A deep understanding of both how sustainability IROs affect the organization, and how in return the organization impacts people and the environment, can serve as a strategic lever for long-term value creation, risk mitigation, and competitive advantage.

Wim Bartels
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"This is a good time to take the lessons learned from the CSRD, and then see: where do we need to focus our strategy with regard to sustainability? Where do we need to set targets? Where do we need a revised or new corporate policy?"

Looking ahead, the sustainability reporting ecosystem is expected to become increasingly digitized. Organizations are anticipated to move beyond manual spreadsheets toward scalable, technology-enabled systems. For example, following the first wave of CSRD reporting, early reporters are already exploring long-term technology solutions to support sustainability data collection, reporting, and assurance. In addition, the reported information is required to be digitally tagged in accordance with the electronic reporting format to ensure its machine-readability. Digital tagging will not be mandatory for companies until the EC adopts the eXtensible Business Reporting Language (XBRL) taxonomy.[6]

While mandatory sustainability reporting is evolving in the EU and globally, the underlying imperative remains: organizations should develop an understanding and measurement of IROs across the value chain. This supports a strategic response that can enhance resilience and long-term sustainability.

It is with this perspective that Deloitte Global has developed this report, including an analysis of 200 Wave 1 CSRD reporters.

Recommendations and actions

The following recommendations are grounded in a broad analysis of Wave 1 CSRD reporters, combined with perspectives and insights from Deloitte Sustainability leaders and external sources. They are designed to help organizations move from compliance to strategic focus. While each organization's sustainability reporting journey can vary, these recommendations and actions offer a pragmatic path forward—supporting integration, improving data quality, strengthening governance, and driving long-term value.

These recommendations are not intended as a checklist, but as strategic guidance to help organizations embed sustainability into core business operations and strategic decision-making.

Materiality assessments: From reporting to resilient growth

Prioritize integration with strategy and risk management
Leading organizations are leveraging the materiality assessment process to identify IROs across the value chain in ways that fuel long-term value creation. By embedding material sustainability IROs into corporate governance, risk management, and strategic planning, they are helping to break down silos between finance, sustainability, and operations.[7]

Arjan de Draaijer
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"The integration of sustainability strategy into business strategy is important. It's not just about reporting compliance but about understanding the strategic implications of sustainability and performance management to help drive meaningful change. When sustainability is woven into the fabric of the business—when it's part of how decisions are made, how performance is measured, and how leadership is held accountable—that's when reporters can start to see real progress. It's a journey, and it requires commitment from the top as well as buy-in from across the organization."

This approach reflects what leading organizations are doing: using materiality assessments as strategic tools to align business priorities with sustainability impact.

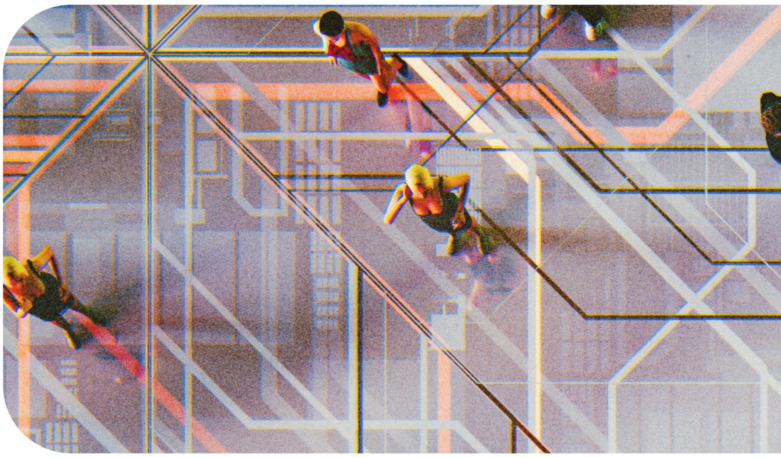
This integration creates a powerful feedback loop: insights from the materiality assessment not only help shape priorities, metrics, and targets, but also help organizations navigate future risks and unlock new opportunities. As practices mature through continuous monitoring and reassessment of IROs, organizations can continue to derive value from both the process and the outcomes.

Leaders have an opportunity to treat the ***materiality assessment as a living tool and a catalyst for innovation.*** Embedding insights into enterprise risk frameworks and strategic planning cycles—with clear ownership from both sustainability and finance leaders—can maximize its impact.

Creating cross-functional governance structures (such as committees or working groups) helps validate material IROs on an ongoing basis and translate them into actionable targets and capital allocation decisions. This kind of integration can help businesses remain agile, future-fit, and aligned with stakeholder expectations and long-term value creation. As the landscape evolves, treating IRO identification and assessment as part of a continuous learning process can support resilience, innovation, and better long-term decisions.

Helena Broadbridge
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Denmark

"A materiality assessment is the birthplace of an organization's strategy and governance. It sets the priorities for sustainability, whether it's impacts, risks, or opportunities, and how these should be governed, actioned, and tracked. Organizations are now realizing that insights from this process should inform the sustainability strategy and also be integrated into its overall business strategy for long-term value creation."



Targets: Delivering on sustainability objectives

Set—and reset—targets linked to actions

Setting and implementing effective sustainability targets remains a significant challenge for many organizations. The absence of standardized methodologies and benchmarks—especially in emerging areas like biodiversity, water stewardship, and social impact—can make it difficult to define measurable goals. Despite this, organizations should aim to set targets that are ***credible, achievable, and aligned*** with both regulatory requirements and strategic objectives in line with how leading organizations are embedding sustainability into broader performance management frameworks.

Industry organizations such as the World Business Council for Sustainable Development (WBCSD) and the Science Based Targets Network (SBTN) are collaborating to develop practical guidance for setting science-based targets for nature, particularly in areas where methodologies are still evolving. Their efforts also underscore the importance of credible target-setting and highlight the value of cross-industry collaboration in shaping emerging practices.[8]

Arjan de Draaijer
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"The sustainability landscape is rapidly evolving, and the challenges encountered can require joint objectives and actions across industries and value chains. That often requires innovation, leading to collaboration with others in their industry or value chain, to help define what ambitious yet achievable targets look like. It's a new way of thinking that may require both creativity and collaboration."

For greenhouse gas (GHG)-related targets, aligning with science based targets supports credibility of GHG emissions reduction. Organizations could expand their ambition to include broader sustainability areas: from reducing Scopes 1, 2, and 3 GHG emissions, to addressing resource use, nature loss, and social impacts across their value chains.

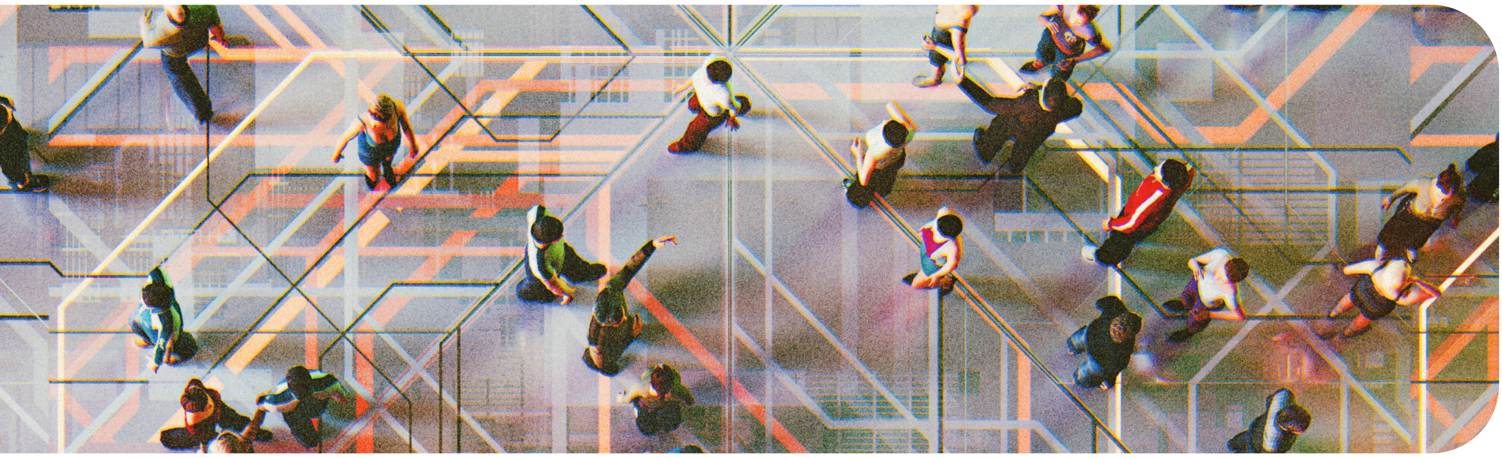
In areas where methodologies are still evolving, leaders have an important role to play. Cross-industry collaboration—with peers, Non-Governmental Organizations (NGOs), decisions makers and academic institutions—can help shape new standards and disseminate leading practices. Leveraging measurement and reporting platforms, underpinned by technology-enabled governance, can be a significant enabler of progress.

Importantly, sustainability targets should not be static.[9] Regular reassessment is important to help reflect new scientific insights, shifting regulations, and technological innovations.[10]

Lukasz Michorowski
Partner, Audit & Assurance Sustainability, Deloitte Poland

"Many organizations aim to set sustainability targets, but these efforts often need to be reoriented to align with its broader business strategy. Moreover, actions are frequently misaligned with the sustainability strategy itself—which, in turn, may not reflect the overall business strategy. This disconnect presents a significant challenge. To help address it, organizations should integrate their financial reporting, strategic planning, and business mindset with the sustainability agenda."

To set and track meaningful sustainability targets, ***high-quality data*** is essential. Organizations have the opportunity to consider how to go about enhancing their data environment, addressing fragmented data collection and promoting consistency and transparency in how sustainability information is gathered, measured, reported, and assured. A strong data infrastructure not only supports credible target-setting but also enables progress tracking, helping organizations build trust and demonstrate accountability to stakeholders.



Governance: Making important connections

Sustainability is a team sport
Effective sustainability performance doesn't reside within a single department. It relies on structured collaboration across core areas: operations (data origin), sustainability (coordination and translation), and finance (reporting and assurance). While the sustainability team may not own the data or the final report, it plays a critical role as a ***catalyst and connector***. Without strong leadership at this intersection, sustainability efforts risk becoming fragmented, reactive, or non-compliant.

Deloitte practitioners observed that leading organizations are increasingly recognizing sustainability as a cross-functional enabler. The sustainability team has an important role to play in ***activating action across departments***—facilitating engagement, supporting the establishment of clear governance and accountability structures, and helping to drive execution as collaborators, rather than solely acting as advisers. Influencing the intersection of operational and financial workflows, and integrating sustainability into both strategic planning and daily operations, can strengthen reporting outcomes and build stakeholder trust.

This reinforces the importance of structured, cross-functional collaboration, an important practice of leading organizations embedding sustainability into governance and core operations.

Ivan Kukhnin
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"I call it the sustainability sandwich: operations bring the ingredients (e.g., data on emissions, waste, energy use, suppliers), finance plates the dish (to ensure reporting is complete, accurate, and ready for assurance), but it's the sustainability team in the middle that makes sure the recipe holds together (interpreting regulatory requirements, engaging with stakeholders, and validating methods). Without the filling, it can fall apart. Organizations should empower the sustainability function with both authority and access to help get the best reporting results."

John O'Brien
Managing director, Sustainability, Deloitte & Touche LLP

"Sustainability is not the responsibility of a single committee—it's a whole-of-board concern. When it's material, it should be embedded across strategy, risk, finance, and governance until it becomes business as usual, not a standalone agenda."

A recent example comes from Unilever, as highlighted in *The Wall Street Journal*[11]: the company merged its corporate affairs and sustainability functions, anticipating that regulation would increasingly steer corporate policy in the future.

No matter the team structure, organizations should ***clearly define sustainability roles and responsibilities***, and clearly communicate these through an internal narrative. Ultimately, success can depend on prioritization, integration, and execution.

Some organizations have established dedicated sustainability committees to help build accountability, capability, and focus. However, with the shift to mandatory reporting, others are considering a longer-term goal: an integrated governance model in which sustainability is embedded into business-as-usual board functions. In this model, specialist committees shift from ownership to orchestration—supporting audit, risk, and remuneration committees in addressing sustainability from their respective vantage points.

Clear role definitions, deliberate cross-committee collaboration, and alignment between sustainability performance and core business levers—such as financial planning, executive incentives, and capital allocation—are essential for integration. Transparently documenting these responsibilities in public disclosures not only supports compliance with reporting requirements, but also signals to stakeholders that the board views sustainability as a driver of long-term enterprise value.

Data: Unlocking operational efficiencies

Build a strong foundation of integrated data

A strong data foundation is important for meeting the spectrum of regulatory and voluntary reporting standards and requirements, including the CSRD. For global organizations, the demand for sustainability data is rising. And while requirements are often similar in nature, they vary in detail across jurisdictions. This reinforces the need for a structured, scalable data architecture that can support evolving expectations and enable both current and future reporting needs. This mirrors the practice of leading organizations which are prioritizing scalable, integrated data systems as a foundation for performance and transparency.

The Omnibus proposal has led some organizations to re-evaluate their technology priorities, shifting focus from last mile reporting tools to the foundational enablers like data quality, accessibility, and governance. Instead of rushing to meet immediate regulatory requirements, organizations can take a more strategic approach: ***assessing, planning, and building systems*** designed to scale with the future of sustainability reporting.

Emerging technologies at the intersection of artificial intelligence (AI), Earth observation (EO) data, and sustainability are helping to unlock new possibilities. For example, AI-powered EO data can help quantify environmental impacts and dependencies with greater precision, opening new pathways for innovation. Organizations can leverage different inputs and data sources—including geospatial, ecological, and third-party datasets—to support strategic decision-making.

Those that invest early in adaptive, AI-enabled infrastructure may be better positioned to transform compliance into a competitive advantage. By aligning planned technology investments with long-term sustainability goals, organizations can minimize the risk of costly rework, improve data quality, and respond more nimbly to shifting stakeholder and regulatory expectations.

Tom Harris
Partner, Technology & Transformation, Deloitte UK

"A solid data foundation isn't just about compliance with mandatory sustainability reporting requirements—it's about building resilience. Organizations that treat data as a long-term investment, rather than a last-minute fix, will likely be better prepared for an evolving landscape of regulatory and voluntary standards. Striking the right balance between reusing existing systems and investing in scalable, future-ready tools is important to meeting diverse reporting demands efficiently and sustainably."

Wim Bartels
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"The evolution of sustainability reporting standards is a dynamic process, driven by the need for greater transparency and accountability. Organizations should stay ahead of these changes by continuously improving their data management and reporting capabilities. The integration of sustainability into core business processes not only enables regulatory compliance, but is also a strategic imperative for long-term success."

Value chain: Ongoing, extensive refinement

Your data isn't the only data that matters

Deloitte Global's research shows approximately 80% of Wave 1 reporters analyzed had clearly mapped IROs across their value chain in their sustainability statements. However, for many organizations, clearly defining, mapping, and capturing reliable data across the ***value chain remains a significant challenge***, particularly when evaluating sustainability IROs. Defining value chain boundaries and accessing upstream and downstream data, especially from suppliers and indirect collaborators, is complex in the context of global supply networks and geopolitical considerations.

Some organizations are beginning to leverage their reporting efforts as a catalyst to improve supplier engagement, enhance traceability, and drive sustainable transformation across the value chain[12]. This kind of proactive engagement is what leading organizations are using to build transparency, resilience, and shared accountability across their ecosystems.

A structured approach to value chain mapping typically starts with establishing a baseline map using available operational data and cross-functional input, then supplementing this with external sources. To meet reporting requirements and foster a culture of data integrity, organizations should implement processes to understand data gaps and apply well-documented, transparent assumptions where data is incomplete. As new insights emerge, periodic review and refinement of the value chain map can transform transparency into a dynamic business capability, rather than a one-time compliance exercise.

Input from external stakeholders such as suppliers, NGOs, or community representatives can also enhance the completeness and help mitigate the risk of biased materiality assessments. This, in turn, supports more accurate identification of sustainability IROs, enhances organizational resilience, and strengthens both risk management and strategic agility in an evolving landscape.

Sustainability maturity can be accelerated by applying the same level of rigor to value chain analysis and sustainability reporting as is used in traditional financial and risk management. Understanding value chain impacts can help not only in identifying risks but also in uncovering opportunities. When viewed through both strategic and resilience lenses, exposures such as geopolitical or operational risks can reveal further possibilities for diversification, innovation, and competitive advantage. This approach gives additional depth to sustainability strategies, reducing the risk of setting goals without grounding, KPIs without data, and plans without accountability.[9]

Emily Cromwell
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte UK

"Understanding your value chain is both a reporting requirement and strategic imperative. It gives organizations the visibility to manage risk, the insight to drive meaningful change, and the credibility to lead on sustainability. Building resilience, particularly in the face of geopolitical uncertainty, demands proactive engagement with stakeholders across the value chain."

Aligning value chain insights with broader sustainability strategy can serve as a powerful lever for both emissions reduction and long-term competitive advantage. The *2024 UN Emissions Gap Report*[13] highlights the pivotal role global supply chains play in mitigating extreme weather impacts, suggesting that large-scale supply chain transformation will be important across industries.

Operations: Aligning processes to thrive

Don't mistake reporting for the end game

In today's fragmented sustainability data environment—where insights can come from spreadsheets, conversations, or scattered systems—leading organizations are starting to move beyond treating sustainability reporting as a once-a-year compliance task. Real value is created by strengthening corporate governance and embedding sustainability considerations into everyday decisions, risk frameworks, and capital allocation.

This shift requires ***aligning internal management reporting with financial reporting processes*** to generate decision-useful data ***and act on insights in real time***. Organizations are encouraged to embed sustainability considerations into strategic oversight and governance structures, enhancing decision-making, improving risk management, and supporting long-term value creation.[14]

To prioritize this more transparent and performance-oriented approach, organizations are encouraged to ***operationalize sustainability data***—treating it as a tool for business performance, not just a reporting artifact, in line with what leading organizations are doing by embedding sustainability metrics into day-to-day decision-making, not just annual reports. This includes:

- Conducting regular cross-functional workshops to scenario plan around mandatory reporting requirements; early engagement can be key to overcoming challenges.
- Transitioning from reactive reporting to proactive performance management on a regular cadence.
- Embedding sustainability metrics into capital expenditure decisions, scenario planning, and insurance risk assessments.
- Developing systems that transform fragmented, low-quality data into actionable insights across business units.

Helena Broadbridge
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Denmark

"Value chain data challenges may require collective solutions and creative incentives. This is not a challenge any one organization should tackle alone. Data transparency across supply chains is a shared, industry-wide challenge that calls for collaboration and co-investment. Innovative models, such as triangular relationships between organizations, suppliers, and financial institutions demonstrate how data collection can be incentivized through mutually beneficial terms. These structures not only enable better sustainability reporting, but also create systemic improvements across sectors. There are already successful examples of sustainability-linked financing between multinational brands in the consumer and financial services industries."

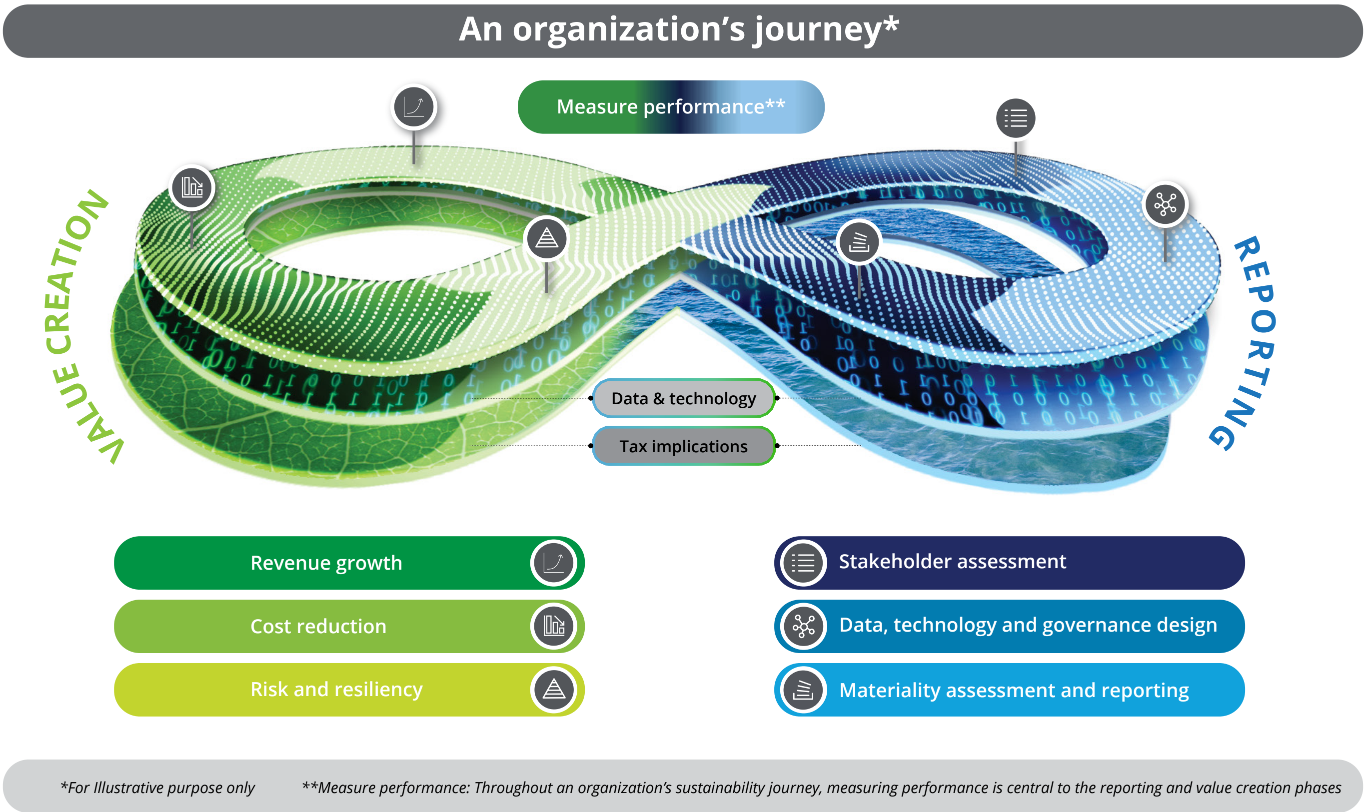
To demonstrate this performance-driven approach, Deloitte Global's sustainability lifecycle (pictured in figure 1) reflects an interconnected model where value creation and reporting reinforce each other. Organizations that embed sustainability across functions, from strategy and risk to data and governance, are better positioned to turn insights into action. A strong data and technology foundation supports this loop, enabling real-time performance tracking and continuous improvement across the business while meeting reporting obligations.

The opportunity isn't just to prepare information to the quality needed to comply with mandatory reporting requirements—it's to continuously make sustainability performance ***measurable, manageable, and focused on material information.*** The stronger the internal alignment and data fluency, the better the outcomes, reputation, and access to sustainable capital. This requires a mindset of continuous improvement, where each reporting cycle builds internal capability, supports more informed decisions, and enables the organization to adapt to regulatory and stakeholder shifts with confidence.

Helena Broadbridge
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Denmark

"It's not just about more data—it's about better, decision-useful information and insights you can use as a business leader. Wave 1 of CSRD reporting has felt heavy on disclosure but light on an integrated narrative. As we move forward, the opportunity is to elevate reporting into something more strategic and compelling—cutting through the noise, telling a clear story, and taking stakeholders on the journey so they can see where organizations are headed and the progress they are making."

Figure 1. Sustainability lifecycle



Source: Deloitte Global

Ivan Kukhnin
Partner, Strategy, Risk & Transactions, Sustainability, Deloitte Netherlands

"Wave 1 of CSRD reporting revealed just how much organizations underestimated the effort involved. Unlike financial reporting, there's no 'off-the-shelf' solution—you can't just plug in a system and move on. Getting it right requires finance-grade discipline, smart use of existing data, and cross-functional collaboration. But mandatory sustainability reporting isn't just about producing one report a year—it's about continuously driving performance. With the right data, businesses gain the insight to course-correct, prioritize investment, and make sustainability a core lever of strategic decision-making. The real challenge is making this repeatable—not by scaling teams, but by embedding accountability across the organization and shifting ownership into the finance function."

Industry insights

While organizations around the world often face common challenges, the IROs they encounter—and how they address them—vary by industry, sector and business model. Each organization can expect to navigate these challenges in a way that reflects its unique context, strategy, and stakeholder expectations.

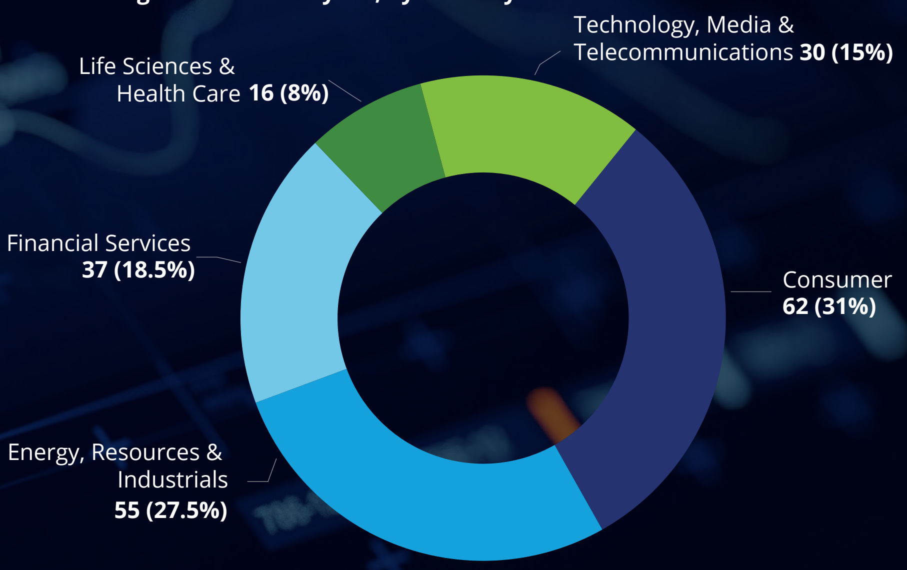
Deloitte Global's analysis of 200 Wave 1 CSRD reports reveals industry-specific trends, challenges, and areas of opportunity across the following five industries:*

- **Financial Services;**
- **Consumer;**
- **Technology, Media and Telecommunications (TMT);**
- **Energy, Resources and Industrials (ER&I); and**
- **Life Sciences and Health Care (LSHC).**

Findings** highlight actions taken at the industry level, such as:

- Financial services organizations embedding sustainability considerations into lending practices and investment decisions;
- Consumer companies prioritizing supply chain transparency and advancing circular economy models;[15]
- TMT companies emphasizing responsible AI development and digital ethics;
- ER&I organizations tackling the complexities of Scope 3 GHG emissions and broader environmental impacts;
- LSHC players focusing on ethical research and development (R&D), improved health outcomes, and post-consumer product responsibility.

Figure 2. Number of organizations analyzed, by industry



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.
*Certain industries and sectors were not included in the analysis due to an insufficient number of published reports within those industries or sectors being available during the data collection period. For further details on the report selection process, please refer to *Methodology, Assumptions and Limitations* section of this report.
**Findings include, both material ESRS topics and entity-specific topics identified by the organizations analyzed. Entity-specific topics arise when an organization concludes that an IRO is either not covered or not covered with sufficient granularity by an ESRS topical standard but is considered material due to its specific facts and circumstances. In such cases, ESRS requires the organization provide additional entity-specific disclosures to enable users to understand the sustainability IROs.

Financial Services

Financial institutions are using their DMA process and its outcome as a catalyst to inform their lending and insurance practices, and considerations within their risk frameworks. This shift reflects a broader trend toward active stewardship, positioning the industry as a potential driving force in the transition to a sustainable economy.

Statistics and facts

37
Organizations

13
Countries

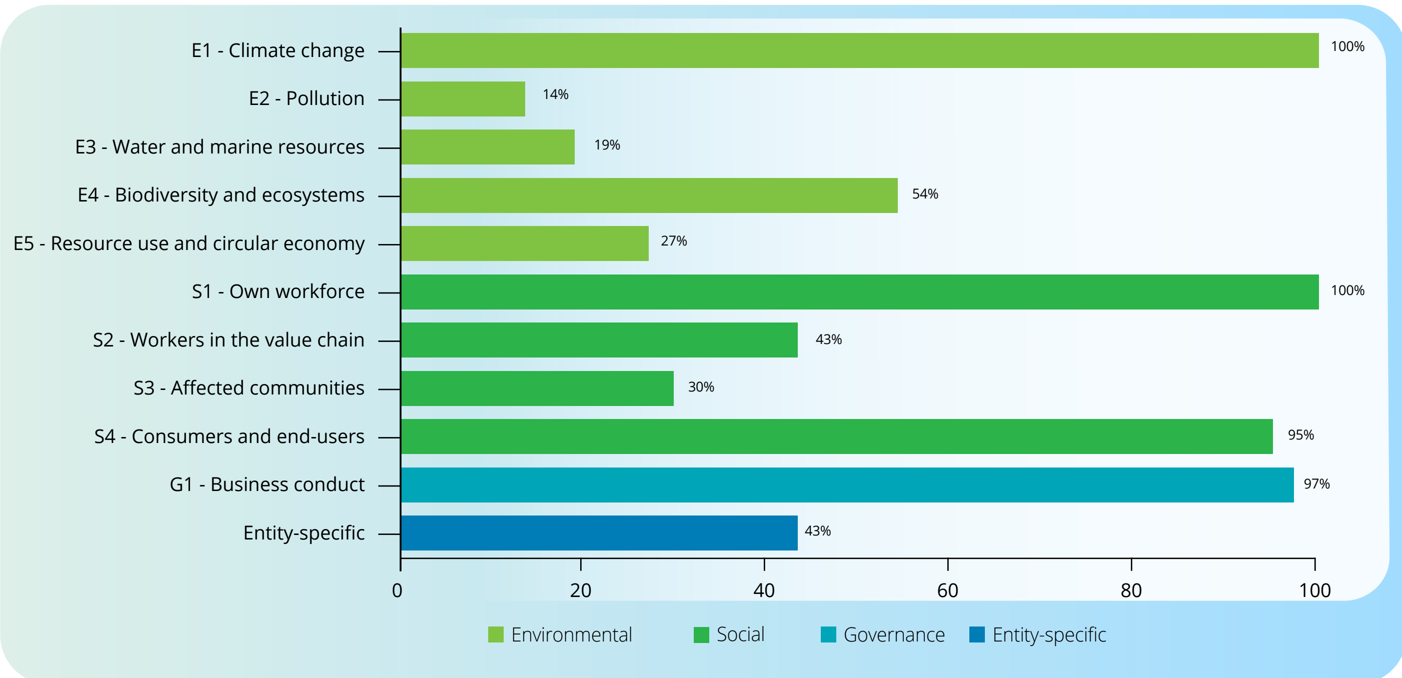
Sectors included

20
Banking and Capital Markets

12
Insurance

5
Real Estate

Figure 3. Percentage of Financial Services organizations identifying material topics



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations. See appendices for more detailed facts and figures.

Three key observations

Out of the 200 organizations analyzed by Deloitte Global, 37 were from the Financial Services industry. From this cohort, three key observations emerged, highlighting how financial institutions are embedding sustainability into operations while working to improve data quality and accountability. These are summarized accordingly.

1. **Embedding sustainability in lending and investment decisions:**
   Analysis of 37 Financial Services organizations shows that sustainability considerations influenced risk-appetite frameworks and capital-allocation across the industry. Of the organizations analyzed, 90% of banks disclosed financed- or portfolio-emissions targets, thereby setting an upper limit on their exposure to high-emitting assets and redirecting future lending and investment toward lower-carbon alternatives. 70% of the banks analyzed set financed emissions targets for five or more sectors, with power generation and real estate each appearing in 90% of those plans.

   Sustainability drivers were reported to be embedded in enterprise risk frameworks of majority of the organizations in the industry cohort. Around 90% integrate climate risk drivers into scenario-based stress tests to inform credit-loss projections, solvency assessments, or asset valuation models. Real estate groups have incorporated building-level hazard mapping—assessing flood, heat, and water stress risks across 100% of assets—linking potential damages to rental income, capital expenditures, and valuations.

2. **Increasing expectations for deeper engagement with stakeholders:**
   Reliance on counterparty information is important to financed-emission measurement. Of the organizations analyzed, every bank (20 out of 20) and almost all insurers (11 out of 12) referenced the Partnership for Carbon Accounting Financials (PCAF)[16] framework as the basis for calculating financed emissions. Banks rarely published a single portfolio-wide PCAF data quality (DQ) score; instead, the asset-class-level typically fell in the DQ-3 to DQ-5 range. On PCAF's scale, these levels indicated that the majority of financed-emission values are still derived from modelled estimates or sector averages, rather than company-reported data.

   The weakest data quality (DQ-5) was most frequently observed in asset classes such as mortgages and commercial/residential real estate, loans to smaller corporates, and certain sovereign bond holdings areas where only high-level economic proxies were generally available. Under Disclosure Requirement ESRS E1-6 (Gross Scopes 1, 2, 3 and total GHG emissions), organizations were required to explain the assumptions behind such estimates which is driving the inclusion of data-reporting covenants, tailored borrower guidance, and, in some cases, disclosure-linked incentive pricing in lending and investment contracts.

3. **Biodiversity integration – uneven progress:**
   Across the 37 Financial Services organizations analyzed, approximately half assessed biodiversity as material and therefore disclosed information related to biodiversity and ecosystems (ESRS E4), with banks more likely to make this determination than insurers or real estate organizations. For those organizations that deemed ESRS E4 material, biodiversity was typically framed as a negative portfolio impact or risk; only a few institutions disclosed related opportunities or positive impacts.

   Most of these reporters disclosed nature-related policies; however only a small number had set time-bound targets—usually related to deforestation-free finance or project-level Biodiversity Net Gain.[17] Assessment efforts frequently used tools such as the Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) tool and the Taskforce on Nature-related Financial Disclosures and its Locate, Evaluate, Assess, Prepare (TNFD-LEAP) approach, and several organizations stated plans to align with the SBTN. However, persistent data gaps were viewed as a constraint on the industry's ability to set quantitative targets.

Consumer

Key focus areas for the Consumer industry include improving supply chain transparency, adopting circular economy models,[15] and addressing labor rights across global value chains. Wave 1 reporters show efforts to embed sustainability into product lifecycles and sourcing practices in response to increasing expectations.

Statistics and facts

62 Organizations

18 Countries

Sectors included

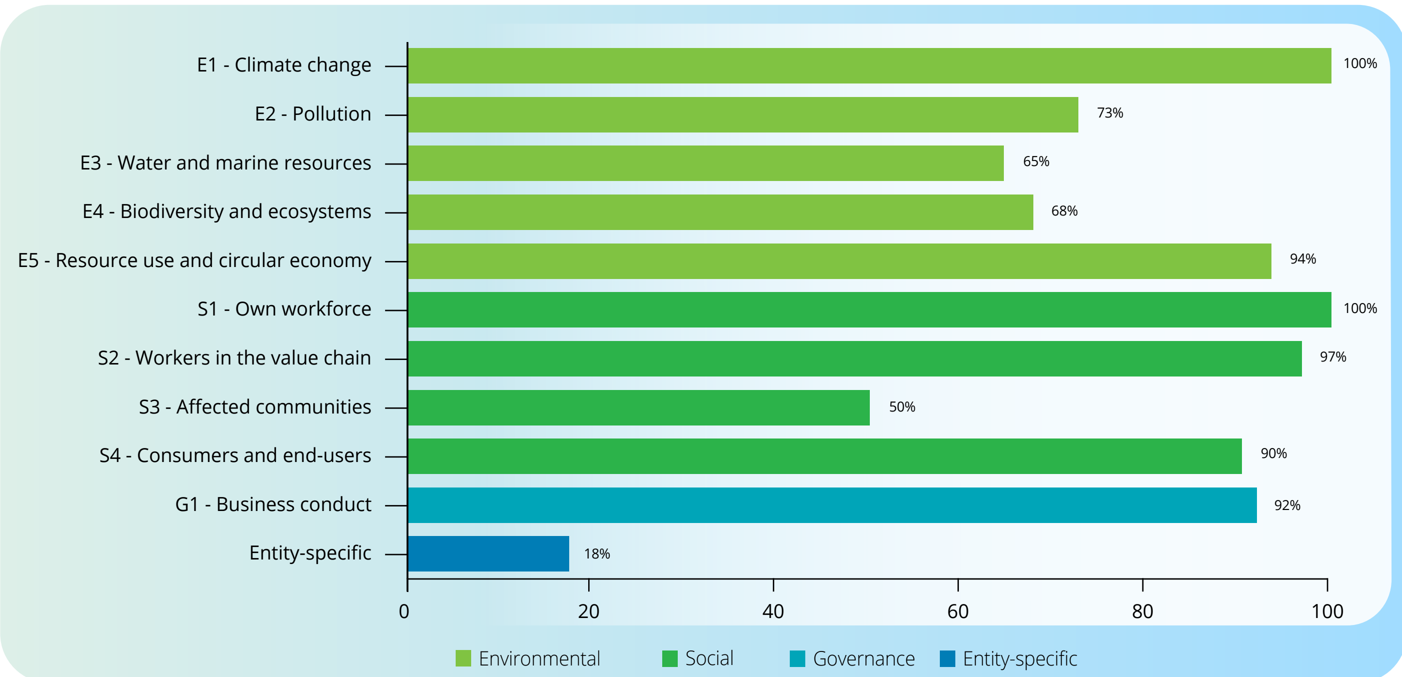
20 Consumer Products

14 Transportation, Hospitality and Service

15 Automotive

13 Retail, Wholesale and Distribution

Figure 4. Percentage of Consumer organizations identifying material topics



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations. See appendices for more detailed facts and figures.

Three key observations

Out of the 200 organizations Deloitte Global analyzed, 62 were from the Consumer industry. Deloitte Global made three key observations, including the challenge these organizations face in assessing and reporting on IROs across vast global value chains and product lifecycles. These are summarized accordingly.

1. **End-to-end supply chain transparency and due diligence:** The application of the materiality requirement in the CSRD and disclosure requirements that relate to the value chain, such as Scope 3 GHG emissions disclosure requirements, require a high level of visibility into vast, often fragmented global supply chains—from ethically sourced raw materials (e.g., sustainable palm oil, conflict-free minerals, deforestation-free commodities) and labor conditions in manufacturing facilities to transportation emissions.

   Managing Scope 3 GHG emissions, which include indirect emissions across the value chain, is increasingly recognized as important in the industry for managing reputational risk and aligning operations with evolving environmental and social accountability standards. Deloitte Global's analysis shows that 95% of Consumer organizations disclose emissions related to purchased goods and services, and 94% report on upstream transportation and distribution emissions. To meet the reporting requirements, organizations have needed to invest in supply chain mapping and supplier engagement.

2. **Emphasis on a circular economy and product lifecycles:** Organizations disclosed strategies focused on product durability, repairability, and recyclability. Of the 62 Consumer organizations analyzed, 58 identified the circular economy as material and therefore disclosed information related to resource use and circular economy (ESRS E5); 97% referenced a policy—typically group-wide environmental or procurement codes that set principles on recyclability, waste hierarchy, and preferred materials—while 98% outlined specific actions and 79% published time-bound targets. These targets typically cover fully reusable or recyclable packaging, higher recycled or bio-based content, and stronger waste-diversion goals, signaling a clear pivot from take-make-dispose to closed-loop models. Targets related to the circular economy were the most frequently-disclosed by organizations in this industry after climate change (ESRS E1) and own workforce (ESRS S1).

   Reporters also highlighted greater use of secondary materials, plastics reduction road maps and expanding take-back, refill and repair schemes. These initiatives can improve resource efficiency and meet mounting regulatory and consumer expectations.

3. **Greenwashing scrutiny and claim credibility:** Consumer organizations reported the widest range of material topics among the five industries analyzed (average 8.5 material topics versus overall average of 7.6 material topics). This is likely due to the complex supply chains which bring in many considerations across all aspects of sustainability reporting. Declaring a wide range of topics as material, if not adequately supported by underlying robust data, can take away from the disclosures' decision-usefulness and invite scrutiny. In response, organizations are strengthening internal controls, enhancing data quality, and investing in third-party assurance to support credible sustainability communications.

Technology, Media and Telecommunications

Disclosures from TMT organizations center on matters such as energy use in data centers, responsible AI, human rights in digital supply chains, and cybersecurity. While climate change (ESRS E1) is a common topic, most environmental matters beyond ESRS E1 were not widely assessed as material in this first wave of reporting

Statistics and facts

30
Organizations

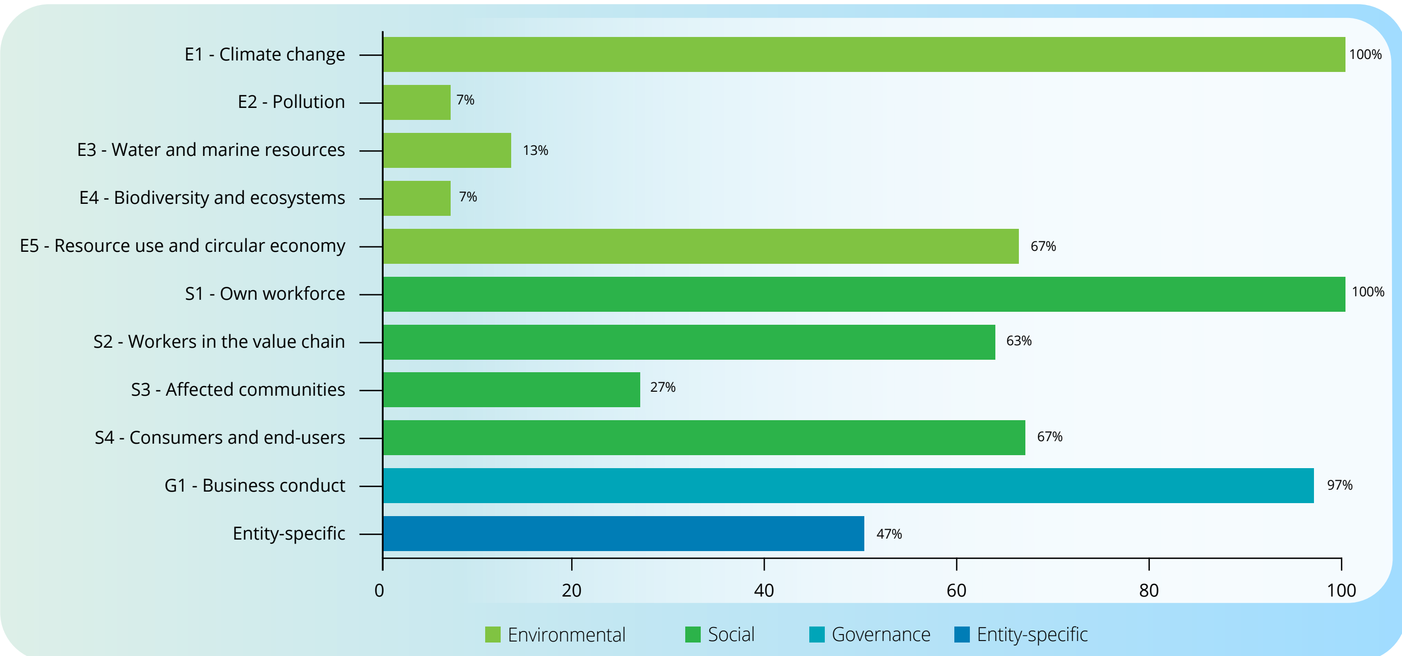
13
Countries

Sectors included

15
Technology

15
Telecom, Media and Entertainment

Figure 5. Percentage of TMT organizations identifying material topics



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations. See appendices for more detailed facts and figures.

Three key observations

Out of the 200 organizations Deloitte Global analyzed, 30 were from the TMT industry. Three industry trends were identified that show TMT organizations are increasingly enhancing sustainability governance practices, are focused on building trust, and are making commitments through setting sustainability targets. These are summarized accordingly.

1. **Supply chain due diligence for human rights and ethical practices:**
   About 60% of TMT organizations analyzed identified workers in the value chain (ESRS S2) as a material matter, and of these, many are moving from high-level policy pledges to establishing operational controls related to suppliers. More than 80% of the organizations that identified material IROs about workers in the value chain had already embedded the UN Guiding Principles into supplier contracts. Health and safety lapses, child labor, and forced labor remain the most frequently cited material IROs, whereas living-wage shortfalls receive comparatively less attention. Some organizations also disclosed that they were investing in real-time traceability platforms to track minerals from pit to product.

2. **Responsible AI and emerging technologies:**
   One third of TMT reporters identified responsible AI or algorithmic bias as a material IRO, often on an entity-specific basis and typically mapped to consumers and end-users (ESRS S4) or business conduct (ESRS G1).

   The material impacts and risks reported include potential discrimination, lack of transparency in AI-decision-making processes and data use, and reputational or regulatory exposure. Notably, three organizations also highlighted commercial opportunities associated with delivering trustworthy AI services.

   Among the organizations that identified AI as material, roughly half disclosed an Ethics Charter or formal governance process. Two organizations went further, publishing specific metrics, for example, a percentage of production models that pass a fairness review. This disclosure signaled that digital ethics is emerging as a recognized sustainability domain and likely to become a relevant matter under sustainability standards. More broadly, this is a topic that could differentiate TMT organizations in building trust with customers and investors in the industry.

3. **Nature-related matters such as pollution, water, and biodiversity rarely identified as material by TMT organizations analyzed:**
   Only six of the 30 TMT organizations analyzed identified IROs related to nature as material (i.e., pollution (ESRS E2), water and marine resources (ESRS E3)), or biodiversity and ecosystems (ESRS E4). These IROs were reported by organizations that operate large manufacturing facilities or network infrastructure, which disclosed mainly negative impacts or risks such as process-water dependency, soil or air emissions, habitat disturbance, and potential compliance costs.

   Six TMT organizations analyzed reported policies, actions, and targets for these sustainability topics, including nature-related goals for 2030-2035. Organizations are using a range of tools to assess IROs related to nature and biodiversity (e.g., Geographic Information System (GIS) overlays, World Wide Fund for Nature Biodiversity Risk Filter (WWF BRF), Global Biodiversity Score (GBS), and TNFD-LEAP). While outcomes often indicated limited exposure, continuous monitoring can help highlight emerging IROs.

Energy, Resources and Industrials

With large environmental and social footprints, organizations in this industry typically report extensively on GHG emissions, biodiversity, circular economy, and labor practices. Wave 1 reporters reflect growing attention to Scope 3 GHG emissions, nature-related impacts, and the role of transition planning in long-term sustainability strategies.

Statistics and facts

55 Organizations

14 Countries

Sectors included

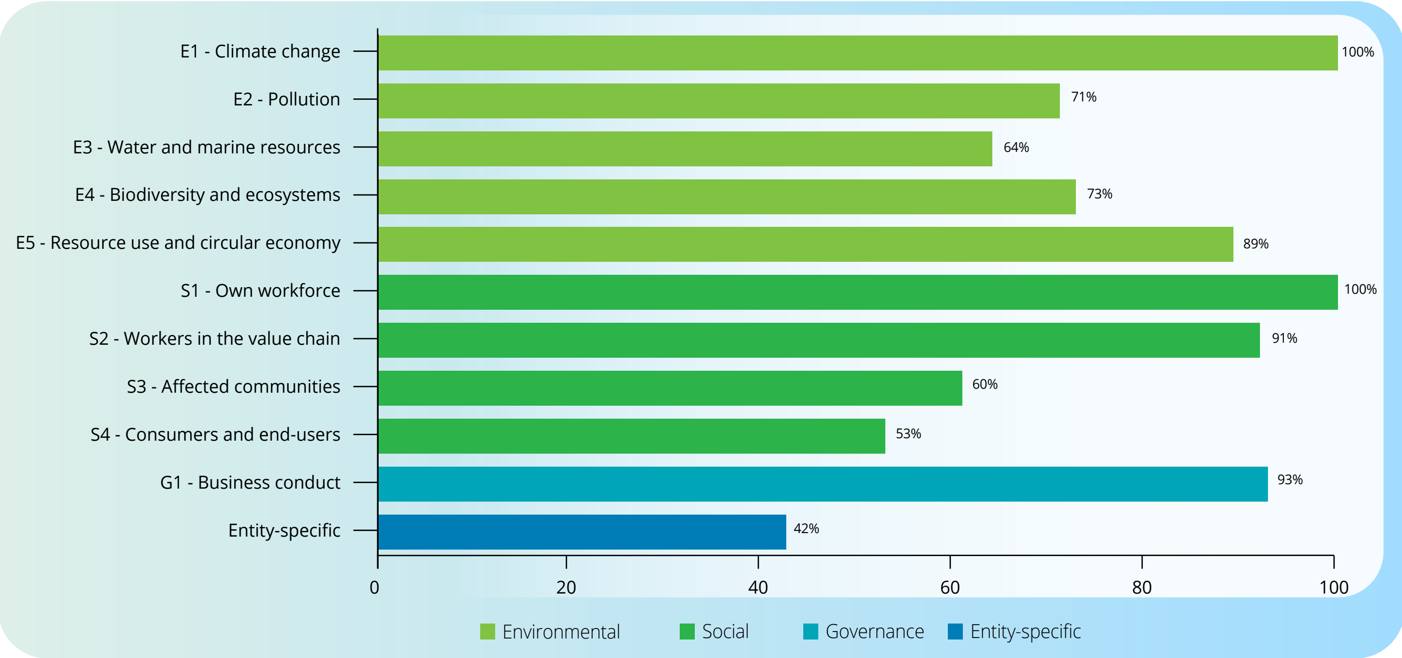
19 Energy and Chemicals

14 Power, Utilities and Renewables

18 Industrial Products and Construction

4 Mining and Metals

Figure 6. Percentage of ER&I organizations identifying material topics



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations. See appendices for more detailed facts and figures.

Three key observations

Out of the 200 organizations Deloitte Global analyzed, 55 were from the ER&I industry. Given the industry's significant environmental and social impacts and complex supply chains, Deloitte Global identified three distinct challenges and opportunities. These are summarized accordingly.

1. **Focus on value chain emissions and energy transition:** A key trend is the increased scrutiny on Scope 3 GHG emissions. Of 55 ER&I organizations analyzed, 30 have set an explicit Net-Zero target for Scope 3 GHG emissions. For energy organizations (oil and gas, utilities), this means reporting on the GHG emissions from the use of sold products, while for industrials (manufacturing, chemicals, metals, and mining), it encompasses GHG emissions from purchased goods and services, transportation, and waste. Reflecting rising stakeholder expectations, organizations in this industry were expected to develop credible transition plans, including clear roadmaps for renewable energy adoption and process electrification—and 51 out of 55 organizations reported having a climate transition plan. Furthermore, just over half of these extended their plans to include nature-related objectives.

2. **Deep dive into environmental and social impacts beyond carbon:** IROs related to climate change (ESRS E1) were assessed as material by all ER&I organizations analyzed. 89% report on practices relating to resource use and circular economy (ESRS E5) such as waste generation and resource efficiency, and 73% report on biodiversity and ecosystems (ESRS E4) (e.g., land use, water pollution from mining). Social impacts in the value chain, including labor practices in global—and, in some cases, high-risk—supply chains, were assessed as material by 50 out of 55 ER&I organizations. These are matters where there is likely to be a greater focus on operationalizing environmental management systems and conducting social due diligence.

3. **Data granularity and industrial-specific metrics:** To meet the disclosure requirements on metrics under ESRS, ER&I organizations increasingly tracked specific data relevant to their operations at a much more granular level, such as energy consumption by source, water withdrawal and discharge by facility, specific pollutant emissions, waste types and disposal methods, and safety incidents. The complexity of these organizations' operational footprints, often spanning multiple sites and jurisdictions, likely made data aggregation and quality control a critical priority. An integrated data-management system that consolidates these diverse datasets, validates them centrally, and offers user-friendly, machine-readable views—such as searchable spreadsheet extracts—could help to enhance consistency and quality to the necessary level to meet mandatory disclosure requirements.

Life Sciences and Health Care

Wave 1 reporters in the LSHC industry disclose a range of sustainability matters, including ethical R&D, healthcare equity, sustainable manufacturing, and human rights in supply chains. The industry also highlights efforts to improve post-consumer product stewardship and to expand access to healthcare in underserved regions.

Statistics and facts

16
Organizations

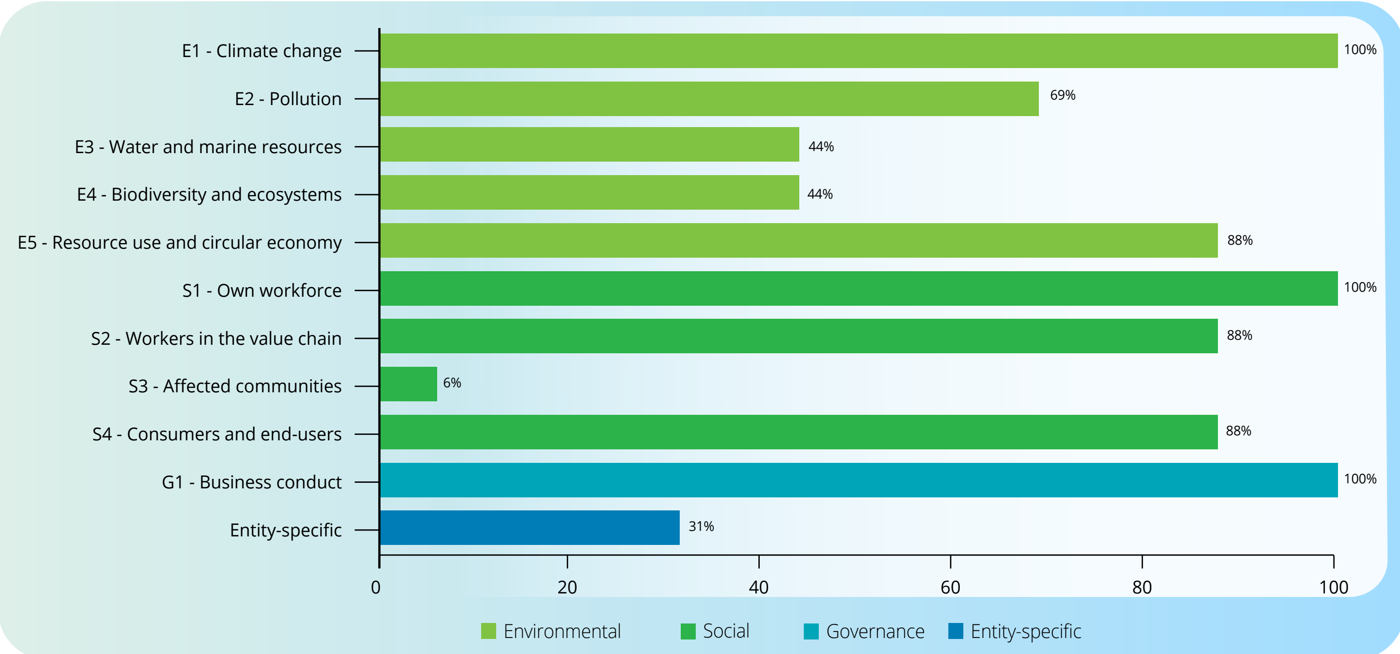
6
Countries

Sectors included

13
Life Sciences

3
Health Care

Figure 7. Percentage of LSHC organizations identifying material topics



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations. See appendices for more detailed facts and figures.

Three key observations

Out of the 200 organizations Deloitte Global analyzed, 16 were from the LSHC industry. Three key trends were identified: board oversight and compliance, community engagement, and improving resource efficiency. Additionally, organizations in this industry also consider ethical criteria, patient wellbeing, and the broader impacts of medical innovation. These are summarized accordingly.

1. **Broadening access - Healthcare equity a material focus:** Of the 16 LSHC organizations analyzed, six (38%) biopharmaceutical organizations explicitly identified access to medicines or healthcare equity as a material impact, typically under the topical standard consumers and end-users (ESRS S4). Disclosures referenced policies on equitable pricing, product donations, and capacity-building in underserved regions. Some highlighted R&D for neglected diseases and their work with non-commercial collaborators. While many described broad access strategies, only a few reported measurable targets (e.g., patients reached by a specific date). Still, the data indicates that these organizations reported on efforts to expand product access and address health disparities—especially in vulnerable or low-resource communities—and to embrace more inclusive healthcare models.

2. **Responsible innovation - Ethical R&D and clinical trials:** Ethical considerations in R&D were identified as material by LSHC organizations. Among the 16 organizations analyzed, around 50% referenced patient safety in clinical protocols, and 45% addressed data privacy in trials. Approximately 30% reported on animal welfare in preclinical testing, noting harm-reduction measures. In contrast, only one organization mentioned gene therapy or AI-driven innovation—indicating these topics were still emerging in disclosures. Overall, most organizations analyzed disclosed information about transparent, ethically grounded R&D, though detailed reporting on advanced technologies remains limited.

3. **Extending responsibility - Post-consumer product impacts under scrutiny:** LSHC organizations are reporting on the environmental impact of products after use. While almost none of the 16 organizations analyzed reported a formal take-back or post-consumer program, several highlighted risks such as improper medicine disposal or device waste. One organization noted the potential for antibiotic residues to pollute waterways, while another applied a cradle-to-grave scorecard approach to product design. Though references to post-use impacts are cited in the reports analyzed, most disclosures did not include related organization-wide strategies or measurable targets. Instead, organizations typically mentioned site-level actions (e.g., solvent recovery) or broad sustainability commitments, indicating early stages of consideration and reporting on product stewardship beyond manufacturing.

Conclusion

Embedding mandatory reporting as a strategic lever

Deloitte Global's analysis of 200 Wave 1 reporters reveals some of the challenges associated with adopting mandatory sustainability reporting requirements, including under the CSRD.

While the CSRD is a regulatory obligation, it also presents a strategic inflection point and opportunity to embed sustainability into the core of the business at all levels—and enhance transparency on the IROs, commitments, actions, and performance of the organization on material topics. The collection, analysis, and assessment of IROs can be leveraged to inform decision-making at the highest levels of leadership within an organization. Organizations that integrate sustainability into their DNA, beyond compliance, can unlock opportunities for innovation, resilience, and competitive differentiation.

Each of the recommendations in this report echoes what leading organizations are doing today to move from compliance to strategic value:

1. **Embedding sustainability into core business functions**
   Embed sustainability into core business planning and execution across legal, finance, risk, operations so it becomes a driver of strategic priorities, performance management, and capital allocation.

2. **Using the assessment of IROs as a strategic tool**
   Leverage materiality assessments to prioritize the sustainability matters most critical to both business success and stakeholders—shaping KPIs, investment decisions, and risk mitigation.

3. **Investing in scalable, integrated data systems**
   Build flexible, composable data and technology architectures that enable reliable, transparent, and real-time reporting. This foundation supports regulatory compliance, stakeholder trust, and internal decision-making.

4. **Setting bold and adaptive targets**
   Move beyond short-term metrics. Define forward-looking measurable targets that are regularly reviewed, linked to incentives, and supported by accountability. Credibility is enhanced when targets are science-based, when appropriate.

5. **Operationalizing sustainability data**
   Treat non-financial data as a strategic asset. Embed sustainability metrics into scenario planning, capital expenditure decisions, and performance management cycles—not just annual reporting.

6. **Engaging early across the value chain**
   Proactively involve suppliers, collaborators, and stakeholders to help surface IROs, improve data quality, and enhance transparency and enhance shared action.

7. **Driving collaboration across functions through an effective governance structure**
   Establish clear governance and accountability structures to enable effective cross-functional collaboration across sustainability, finance, legal, risk, and technology to ensure clear ownership, consistency, and operational follow-through in reporting and action.

8. **Adopting a mindset of continuous learning**
   Treat mandatory sustainability reporting as a capacity-building journey. Organizations that embed continuous improvement and upskilling are often more agile in responding to regulatory evolution and shifting stakeholder expectations.

Kristen Sullivan
Deloitte Global Audit & Assurance Sustainability Services Marketplace leader

"Despite the shifting global sustainability policy and regulatory landscape, the business case for sustainability is important for many organizations. Navigating this dynamic set of market conditions, while focusing on sustainability performance most material to the business and key stakeholders, requires a thorough materiality analysis to understand sustainability risks, opportunities, and time horizons for accountability and integration into the business strategy. Governance and capacity building can strengthen adaptability in the face of evolving market expectations, uncertainty, and regulation. Sustainability data is the foundation."

Appendices

Appendix 1. Facts and figures

This appendix contains additional graphical representations that complement the analysis presented in the main report. Detailed charts and visualizations illustrate the benchmarking results of 200 reporters, presented both in consolidated form and segmented by industry. These supplementary graphs provide deeper insight into comparative performance and key trends observed across the diverse industries analyzed.

Table 1. Number of organizations analyzed, by industry and sector

Industry	Sector	Number of ogranizations analyzed
Consumer	Automotive	15
Consumer	Consumer Products	20
Consumer	Retail, Wholesale & Distribution	13
Consumer	Transportation, Hospitality & Services	14
Energy, Resources & Industrials	Energy & Chemicals	19
Energy, Resources & Industrials	Industrial Products & Construction	18
Energy, Resources & Industrials	Mining & Metals	4
Energy, Resources & Industrials	Power, Utilities, & Renewables	14
Financial Services	Banking & Capital Markets	20
Financial Services	Insurance	12
Financial Services	Real Estate	5
Life Sciences & Health Care	Health Care	3
Life Sciences & Health Care	Life Sciences	13
Technology, Media & Telecommunications	Technology	15
Technology, Media & Telecommunications	Telecom, Media & Entertainment	15

Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

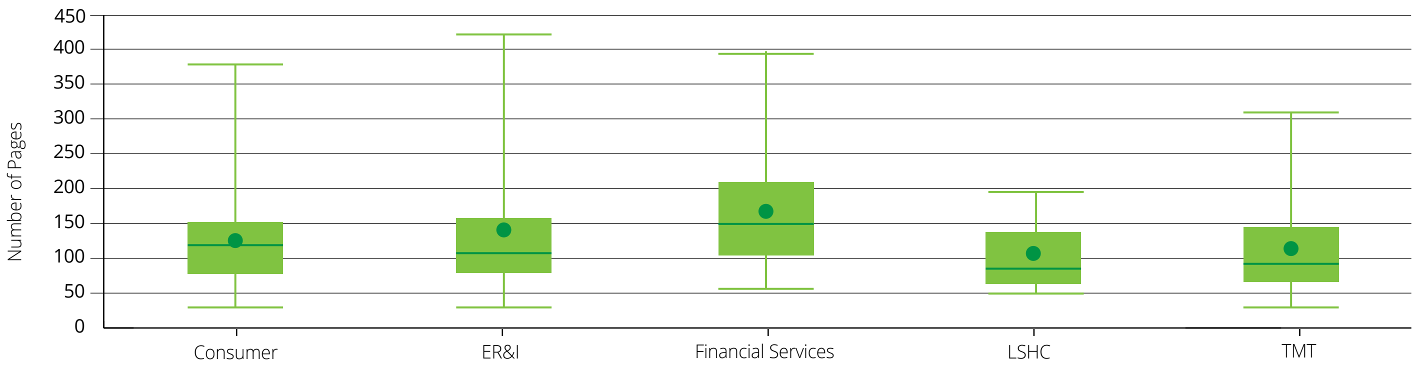
Table 2. Number of organizations analyzed, by headquarter country

Country	Number of organizations analyzed
France	40
Germany	39
Netherlands	29
Denmark	18
Spain	15
Finland	12
Italy	7
Austria	6
Belgium	5
United Kingdom	5
Luxembourg	4
Poland	4
Sweden	4
Lithuania	2
Norway	3
Switzerland	3
Portugal	2
Estonia	1
Ireland	1

Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 8. Length of sustainability statements in number of pages, by industry

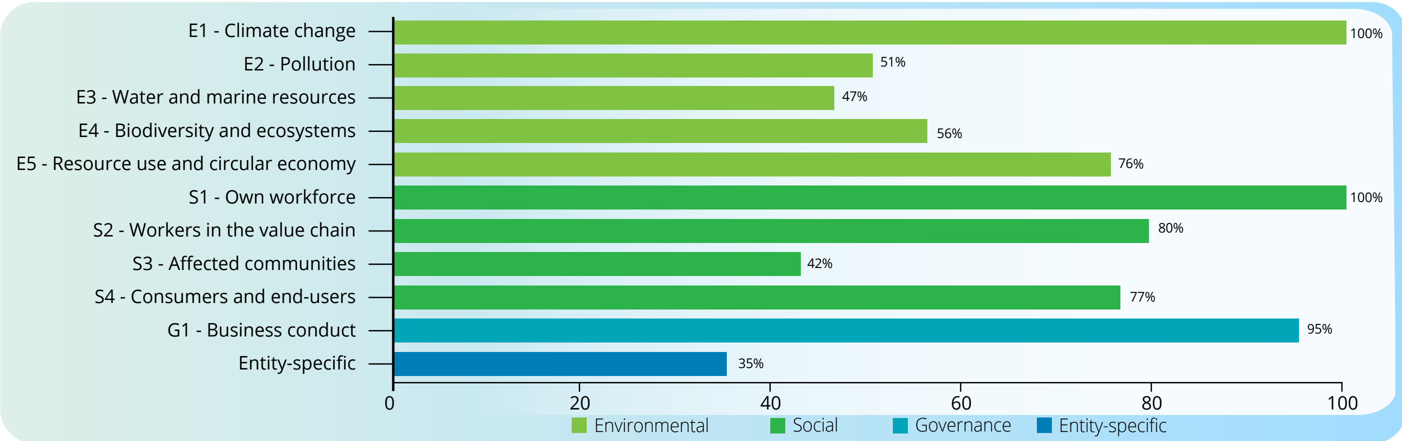
This whisker chart compares the length of organizations' sustainability statement across industries, showing average number of pages (dot inside green box), median (central line inside green box), and the range showing minimum and maximum number of pages (whiskers).



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

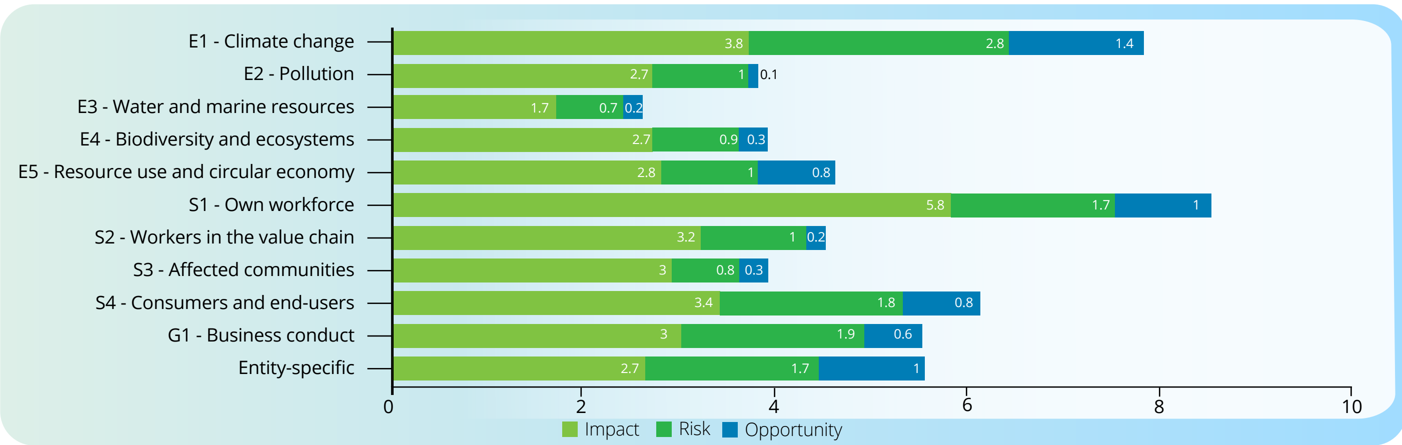
DMA outcomes

Figure 9. Percentage of organizations analyzed identifying material topics, consolidated view



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 10. Average number of material IROs per material topic, consolidated view



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 11. Percentage of organizations analyzed identifying material topics, by industry

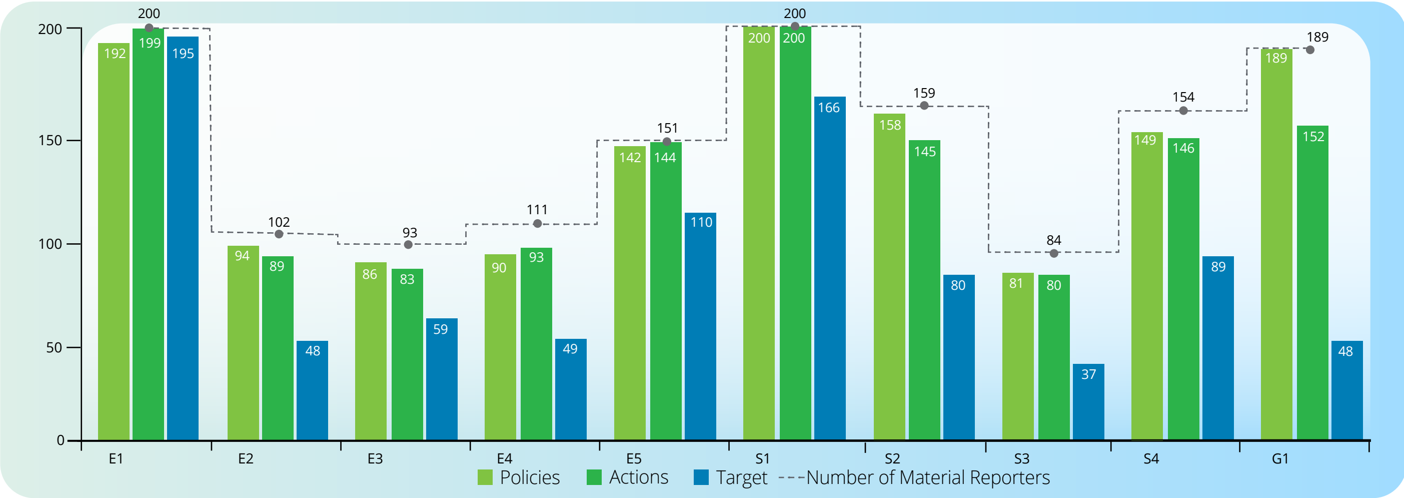
ESRS Topic	Consumer	Energy, Resources & Industrials	Financial Services	Life Sciences & Health Care	Technology, Media & Telecommunications
E1	100%	100%	100%	100%	100%
E2	73%	71%	14%	69%	7%
E3	65%	64%	19%	44%	13%
E4	68%	73%	54%	44%	7%
E5	94%	89%	27%	88%	67%
S1	100%	100%	100%	100%	100%
S2	97%	91%	43%	88%	63%
S3	50%	60%	30%	6%	27%
S4	90%	53%	95%	88%	67%
G1	92%	93%	97%	100%	97%
Entity-Specific	18%	42%	43%	31%	47%

Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Policies, actions, and targets

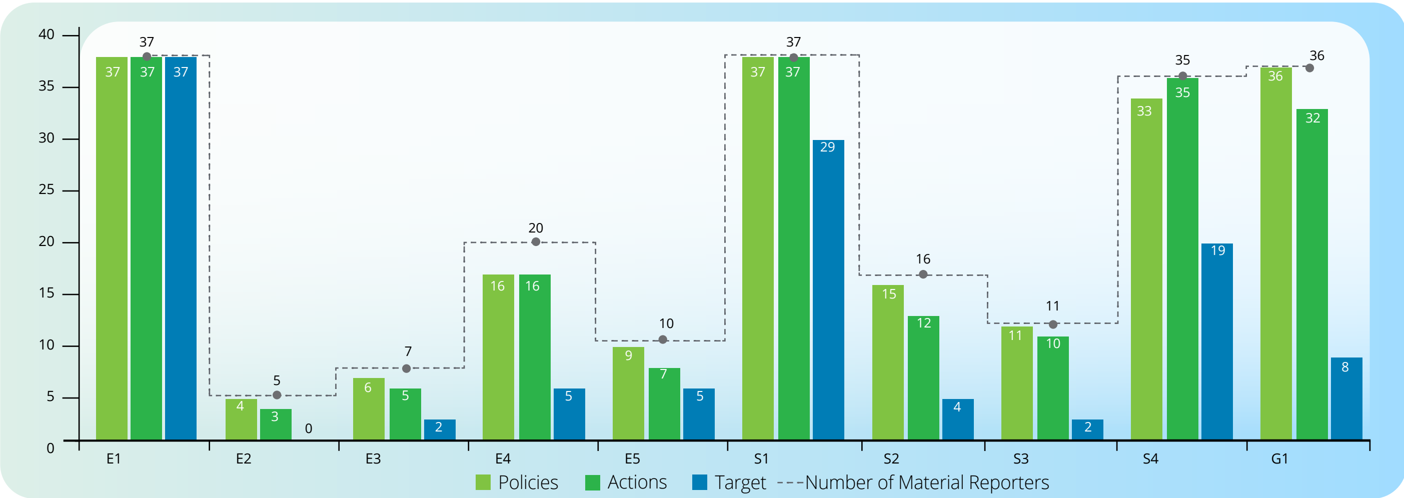
These bar charts show the number of organizations disclosing the underlying policies, actions, and targets across the material ESRS topics reported. The line depicts the number of organizations disclosing material information for the given ESRS topic, and the number can be seen above the step dotted line.

Figure 12. Number of organizations disclosing policies, actions, and targets per material topic, consolidated view



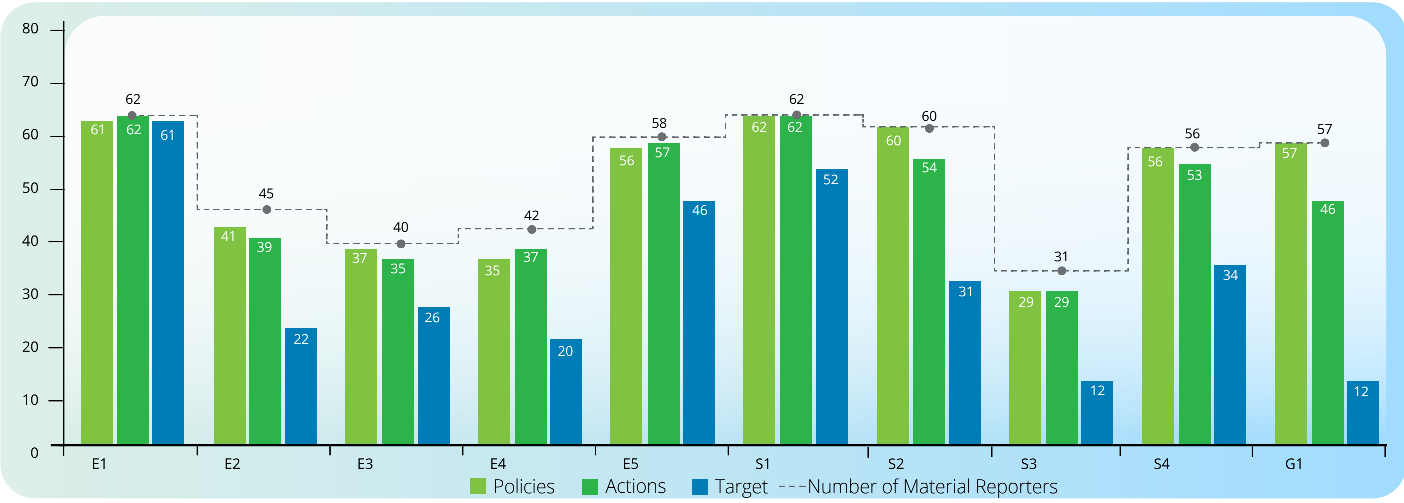
Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 13. Number of organizations disclosing policies, actions, and targets per material topic, Financial Services industry



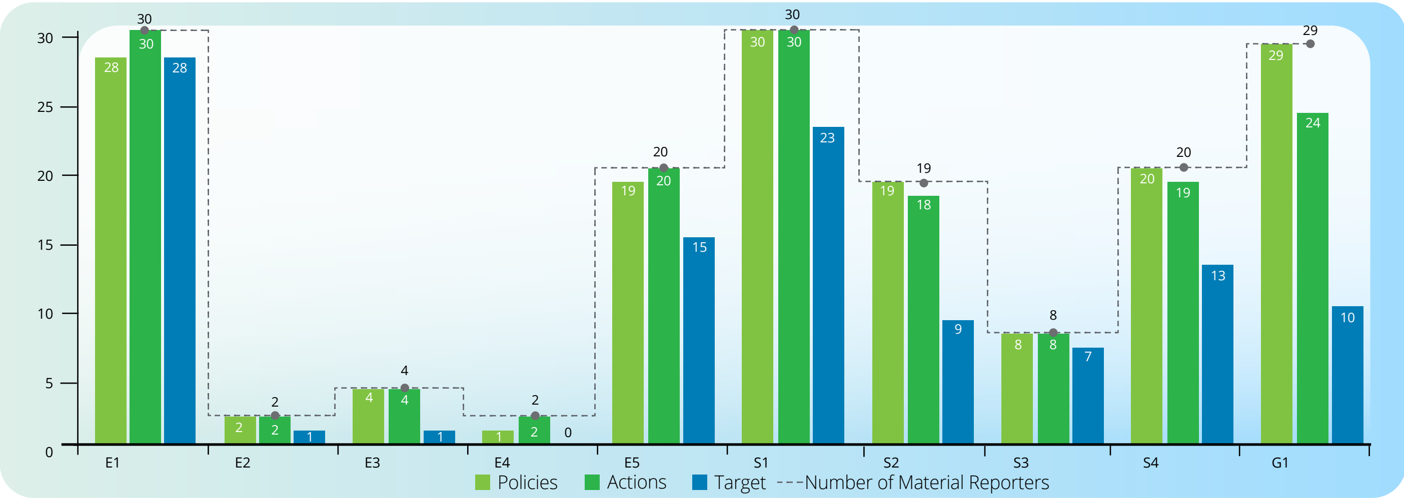
Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 14. Number of organizations disclosing policies, actions, and targets per material topic, Consumer industry



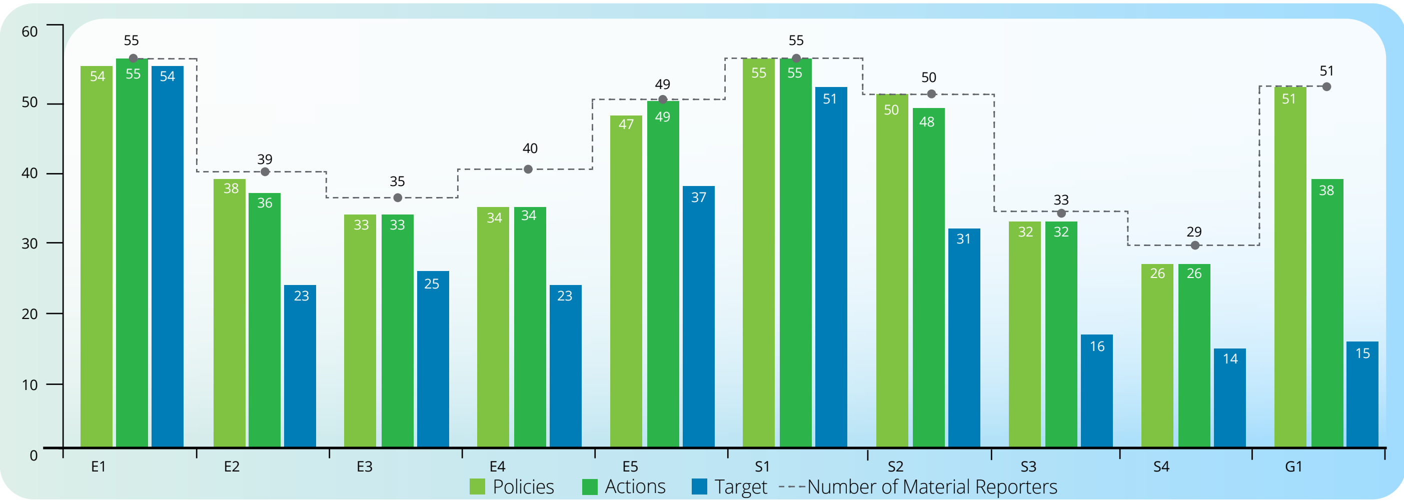
Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 15. Number of organizations disclosing policies, actions, and targets per material topic, TMT industry



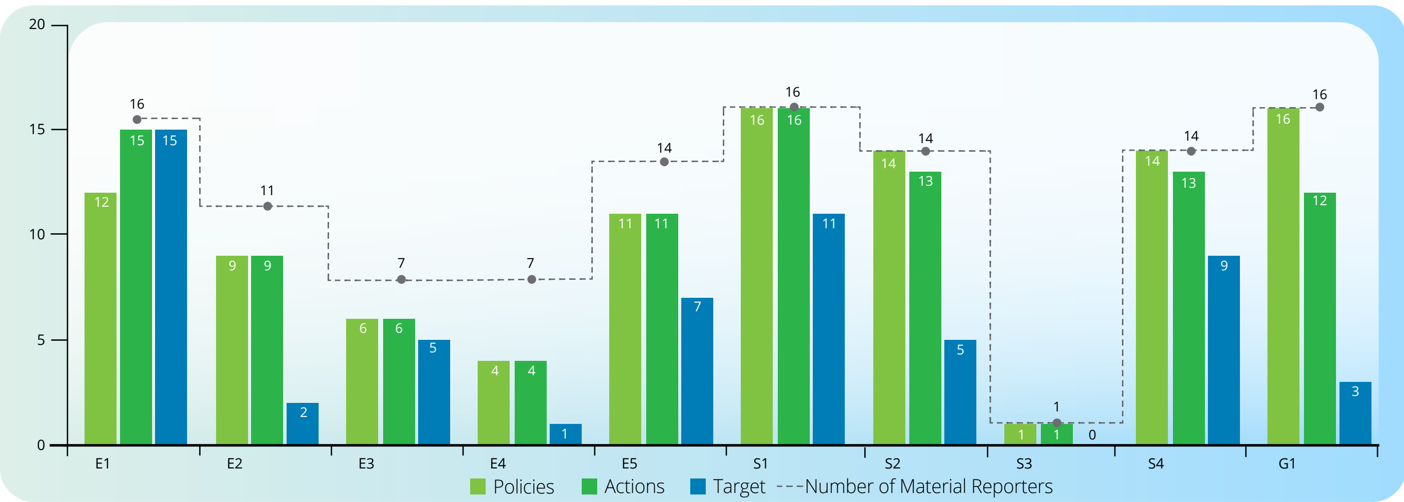
Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 16. Number of organizations disclosing policies, actions, and targets per material topic, ER&I industry



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Figure 17. Number of organizations disclosing policies, actions, and targets per material topic, LSHC industry



Source: Deloitte Global analysis based on 200 Wave 1 CSRD reporting organizations.

Appendix 2. Methodology, assumptions and limitations

Reports selection process:
This analysis selected 200 organizations from Wave 1 of the CSRD, using a criteria-driven approach. Eligible organizations were those with CSRD reports for financial periods starting on or after 1 January 2024, available in English or officially translated, and published by 23 April 2025. Within each industry, organizations were first chosen based on the highest market capitalization. To promote geographic diversity, additional organizations from under-represented jurisdictions were selected, also based on the highest market capitalization. The methodology aimed to provide both industry and geographic balance. All selection criteria, findings and conclusions are inherently subjective and based on professional judgment.

Data integrity:
This analysis was limited solely to whether the selected reporting organizations made certain disclosures, not whether such disclosures complied with ESRS or any other applicable reporting requirement. Deloitte Global expresses no view on the accuracy, completeness, quality or materiality of any disclosures analyzed.

Intended use:
All data is provided for informational purposes only. The data presented is based on available information and should be interpreted with caution. Users of this report are advised that any presentations or analyses derived from this data must accurately reflect the information in the report.

Other assumptions and limitations:

- For the disclosure of IROs per ESRS topic and across the value chain and time horizons:
  - Mapping of IROs to ESRS topics and sub-topics was guided by the names of the related material topics and the disclosed ESRS topics reported by the organization;
  - The information was treated as not being disclosed, and was excluded from calculations of IROs if not clearly disclosed and mapped to the relevant parts of the value chain and time horizon in the report analyzed;
  - One IRO description could be indicated by organization as both impact and risk, or impact and opportunity, and therefore could appear more than once in the calculations of IROs;
  - One IRO could be mapped to multiple parts of the value chain and time horizon, and therefore could appear more than once in the calculations of IROs; and
  - The description of IROs was derived from the text of the report when possible, if not clearly disclosed in the report analyzed.

- For the percentage of organizations disclosing policies, actions, and targets per material ESRS topic, the organizations analyzed were included in the count if the organization disclosed at least one sub-topic within the topic, including entity-specific sub-topics.

Appendix 3. Further reading

Recent Deloitte assets on CSRD reporting

Reports:

- CSRD reporting benchmark study 2025: On 22 Finnish organizations | Deloitte Finland
- Sustainability Reporting Benchmarking Insights: Read our insights report on '100 ESG data points-reporting'for the 35 Danish Large Cap Organizations | Deloitte Denmark
- Navigating the Swiss Sustainability Reporting Landscape | Deloitte Switzerland
- European Commission Proposes Reduction in Sustainability Reporting and Due Diligence Requirements-Considerations for U.S. Entities | Deloitte & Touche LLP
- Unlocking opportunities with CSRD: Deloitte Global articles
- CSRD in the banking sector: An international study | Deloitte Germany
- Application of CSRD to the banking sector: A survey conducted by Deloitte Italy and the University of Parma

Articles:

- How double materiality can help catalyze growth, transformation | Deloitte & Touche LLP
- Proposed changes to EU sustainability reporting: Considerations for US organizations | Deloitte & Touche LLP
- As sustainability reporting becomes mandatory, all eyes are on data | Deloitte Global
- Sustainability reporting: Tapping existing expertise to improve outcomes | Deloitte & Touche LLP

Tools:

- Deloitte Netherlands CSRD Series: Supporting you step by step

Appendix 4. Glossary of terms

Term	Definition
BNG	Biodiversity Net Gain—a development approach that aims to leave nature in a better state than before. It requires developers to enhance and restore biodiversity (not just offset losses) by ensuring that any negative impact on ecosystems is outweighed by measurable improvements.
CSRD	Corporate Sustainability Reporting Directive—an EU directive requiring certain large and listed companies to disclose standardized, detailed sustainability information. It expands the scope and depth of reporting compared to the earlier Non-Financial Reporting Directive (NFRD), mandating double materiality, external assurance, and reporting in line with ESRS.
DMA	Double materiality assessment—a core ESRS requirement where companies assess both: • Financial materiality: sustainability matters that affect an organization's development, performance and position. • Impact materiality: the organization's impact on people and the environment. ESRS requires organizations to report on matters that are material from either or both perspectives.
EFRAG	Formerly known as the European Financial Reporting Advisory Group—the EU-appointed body responsible for drafting the ESRS and providing technical guidance on sustainability reporting to the European Commission.
ENCORE	ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) is a free online tool developed by the Natural Capital Finance Alliance and the UN Environment Programme (UNEP). It helps financial institutions and companies understand how their activities depend on and impact natural capital—such as biodiversity, water, and soil—and how environmental change can pose risks to economic performance.
ESRS	European Sustainability Reporting Standards—a set of sustainability reporting standards developed under the mandate of CSRD. They specify the information that an organization is required to disclose about its material impacts, risks and opportunities (IROs) in relation to sustainability matters.
GRI	The Global Reporting Initiative (GRI) sets standards for organizations to be transparent on how they contribute or aim to contribute to sustainable development, enabling an organization to report its most significant impacts on the economy, environment, and people, including their human rights.
IROs	Impacts, risks, and opportunities—a central concept in CSRD/ESRS. IROs refer to the sustainability-related impacts an organization causes or contributes to, and the risks and opportunities it faces from sustainability-related factors.
LCAs	Life Cycle Assessments—a methodology/tool to help assess the environmental impacts associated with the stages of a product's life from raw material extraction to disposal. It helps organizations quantify their impacts on nature, sustainability and resources, guiding sustainable design and supply chain decisions.
Omnibus proposals	A series of proposals developed by the EC under its Competitiveness Compass with the intent to reduce the regulatory and administrative burden on organizations, the EC will publish a series of omnibus proposals. The first in the series of 'simplification omnibus' packages covers simplification in the fields of sustainability reporting, due diligence and taxonomy.
PCAF	Partnership for Carbon Accounting Financials—a global initiative that enables financial institutions to measure and disclose the greenhouse gas (GHG) emissions associated with their loans and investments, commonly referred to as financed emissions.

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Endnotes

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