

A small green seedling with two leaves grows out of the center of a target-like pattern of concentric circles on a mossy surface. The background is a soft-focus green field with sunlight filtering through, creating a bokeh effect.

EU Omnibus Proposals

What it Means for Sustainability Reporting

March 2025

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1. Overview of the Omnibus Proposals



Executive Summary

Introducing the Omnibus I and Omnibus II Simplification Packages

The European Commission has released an **Omnibus package** to reduce sustainability reporting and due diligence requirements. As part of this Omnibus package only the largest companies would report under European Sustainability Reporting Standards (ESRS); a subset of those companies would continue to report under the EU Taxonomy. These changes would need to be approved by the European Parliament and the Council of the EU and transposed into national law to become effective. Furthermore, the Commission announced that it will simplify ESRS disclosure requirements and is consulting to amend the EU Taxonomy.

What is included in the Omnibus package?

1. A proposal for a Directive amending the **CSRD** and the **CSDDD**
2. A proposal which **postpones the application** of all reporting requirements in the **CSRD** for companies that are due to report in **2026 and 2027** (so-called **wave 2 and 3 companies**), and which **postpones the transposition deadline** and the first wave of application of the **CSDDD** by one year to **2028** (see high-level below)
3. A draft Delegated Act amending the **Taxonomy Disclosures** and the **Taxonomy Climate and Environmental Delegated Acts**, subject to public consultation.
4. A proposal for a Regulation amending the **Carbon Border Adjustment Mechanism Regulation**
5. A proposal for a Regulation amending the **InvestEu Regulation**

Key Changes Proposed

The proposal introduces several key changes to corporate sustainability reporting and due diligence requirements that could significantly impact sustainability reporting across the EU.

Scope & Timelines

- The **CSRD** will now apply to companies with **over 1,000 employees**.
- Current wave 2 and 3 companies receive a **2-year delay** to prevent firms from beginning CSRD reporting only to be excluded later if they have fewer than 1,000 employees.
- For the **CSDDD**, wave 1 companies have one more year to comply as the Directive will start applying from **July 2028**. For wave 2, the requirements apply from 26 July 2029.

Assurance

- The Commission will be providing **guidance on limited assurance standards** for companies by 2026.
- The proposal has removed the requirement for the Commission to adopt a delegated act on reasonable assurance.

Datapoints

- The European Commission will adopt a delegated act to **revise the first set of ESRS**, at the latest six months after the entry into force of the proposal.
- The **number of datapoints will be “substantially” reduced** and the revision will prioritise quantitative data and distinguish between mandatory and voluntary points.

Sector-Specific Standards

- **Sector-specific standards** requirements under CSRD are removed. Companies may only use sector-agnostic standards.

CSDDD

- **Reduces scope of due diligence** to own operations, subsidiaries and direct business partners, unless plausible information suggests adverse impacts exist, or may exist, at indirect business partner level.
- Other key simplifications include **streamlining stakeholder engagement**, **removing the mandatory termination** of business relationships as a last resort, and **extending the interval between in-depth assessments** to five years.

Other CSDDD requirements

- **Removes EU-wide civil liability regime**, deferring to national law. **Transition plans remain mandatory**, but the proposal modifies the transition plan requirement to strengthen alignment with the CSRD.
- It also **restricts Member States from introducing more stringent due diligence obligations**, and finally it **removes the possibility of introducing future legislation** in 2026 that would expand due diligence obligations to downstream financial services firms.

SMEs & Small Midcaps

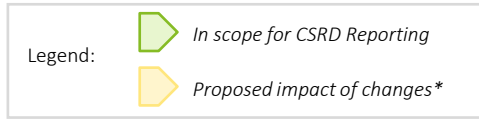
- The proposal **reduces data requirements for smaller companies**. CSRD limits reporting companies to seeking information from value chain companies **only as specified in the voluntary standards** that will be adopted by the Commission.
- Companies in-scope of CSDDD also limited to requesting information aligned with voluntary standards, but they can request **additional information if deemed essential** for identifying adverse impact data that cannot be obtained elsewhere.

Taxonomy Regulation

- Reporting obligations will be limited to the largest companies, with **voluntary reporting** introduced for certain large companies within the future CSRD scope, and **voluntary reporting on partial Taxonomy-alignment**.
- The Commission is also consulting on **reducing reporting templates** by around 70%, introducing a **financial materiality threshold** for Taxonomy reporting, **simplifying certain DNSH criteria**, and amending the **Green Asset Ratio** for banks.

Proposed Threshold Changes

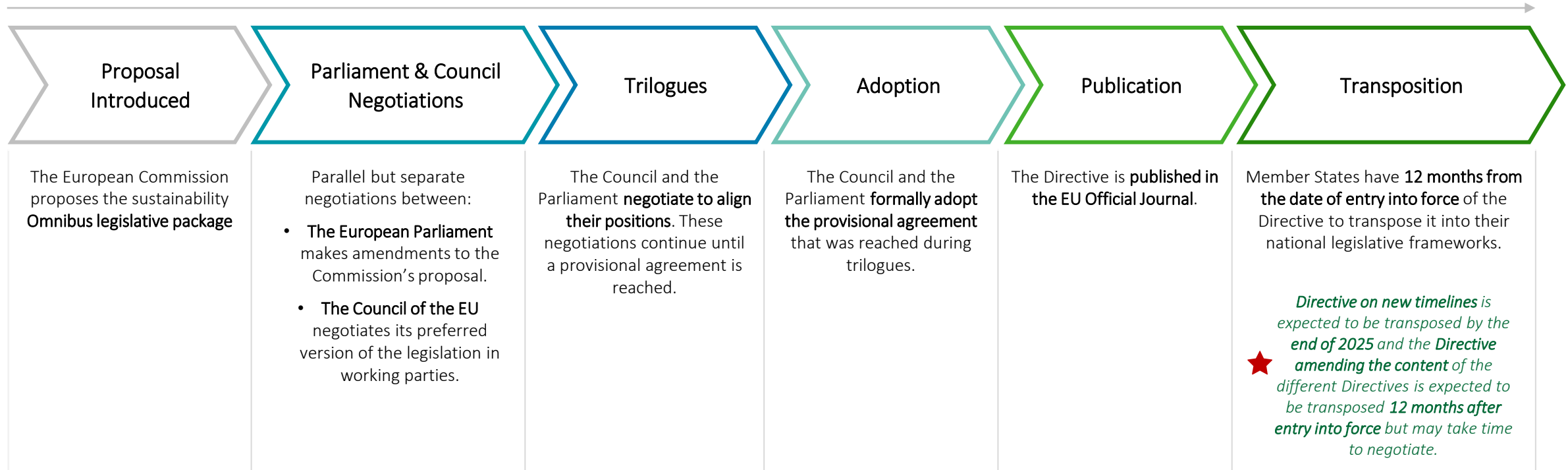
A key element of the proposal is shifting from the wave approach to a dual-threshold system.



		FY24 <i>Reporting in 2025</i>	FY25 <i>Reporting in 2026</i>	FY26 <i>Reporting in 2027</i>	FY27 <i>Reporting in 2028</i>	FY28 <i>Reporting in 2029</i>	FY29 <i>Reporting in 2030</i>
Existing timing and thresholds							
Wave 1: Large EU PIEs	<ul style="list-style-type: none">PIEs with 2 out of 3: Turnover: > €50M, Balance sheet: > €25M, or Employees: > 500	In scope for CSRD reporting					
Wave 2: Large EU Company	<ul style="list-style-type: none">2 out of 3: Turnover: > €50M, Balance sheet: > €25M, or Employees: > 250	In scope for CSRD reporting					
Wave 3: Listed SMEs & Small non-complex	<ul style="list-style-type: none">All SMEs listed on an EU regulated market and Small and Non-Complex Institutions (possibility to defer until 2028)	In scope for CSRD reporting					
Wave 4: Non-EU entities	<ul style="list-style-type: none">Certain non-EU entities: Turnover: > €150M generated in EU and EU subsidiary that is a large undertaking, or EU Branch Turnover > €40M	In scope for CSRD reporting					
Proposed timing and thresholds*							
Wave 1: Large EU PIEs	<ul style="list-style-type: none">No direct reference to EU PIE thresholds in the proposed changes. Potential thresholds: Turnover: > €50M, or Balance sheet: > €25M and Employees: > 1000	In scope for CSRD reporting			Only in scope if: Turnover: > €50M, or Balance sheet: > €25M and Employees: > 1000		
Wave 2: Large EU Company	<ul style="list-style-type: none">Turnover: > €50M, or Balance sheet: > €25M and Employees: > 1000	Deferral of reporting requirement from 2025 to 2027			Only in scope if: Turnover: > €50M, or Balance sheet: > €25M and Employees: > 1000		
Wave 3: Listed SMEs & Small non-complex	<ul style="list-style-type: none">As above	Deferral of reporting requirement from 2026 to 2028			Only in scope if: Turnover: > €50M, or Balance sheet: > €25M and Employees: > 1000		
Wave 4: Non-EU entities	<ul style="list-style-type: none">Large non-EU entities: Turnover: > €450M generated in EU and EU subsidiary that is a large undertaking or EU Branch Turnover > €50M				Only in scope if Turnover: > €450M generated in EU and EU subsidiary that is a large undertaking or EU Branch Turnover > €50M		

Next Steps

With the package now published, the legislative proposals will undergo the standard EU legislative process



*The Commission invites the co-legislators to **treat this omnibus package with priority**, in particular the **proposal postponing certain disclosure requirements under the CSRD and the transposition deadline under CSDDD**.*

Important note: For Member States that have **already transposed the CSRD**, these existing legislations remain in force until the proposed Directives have been finalised and transposed into local law.

2. Summary of Proposed Changes by Regulation



Simplifying the ESRS

Omnibus I and Omnibus II Proposals – Key CSRD proposed changes

#	Aspect	Proposed Change
1	Postponement of reporting requirements	<ul style="list-style-type: none">Postpone by two years the entry into application of the reporting requirements for large companies that have not yet started implementing the CSRD and for listed SMEs (Wave 2 and 3).
2	Reduction of the scope of reporting companies	<ul style="list-style-type: none">Reporting requirements to only apply to large undertakings with more than 1,000 employees (and either a turnover > €50M or a balance sheet total > €25M).
3	Value chain cap	<ul style="list-style-type: none">For companies not in the scope of the CSRD anymore (<1,000 employees), the Commission will adopt by delegated act a voluntary reporting standard, based on the EFRAG VSME standard.
4	Commission commitment to revise the ESRS	<ul style="list-style-type: none">The Commission will revise the delegated act establishing the ESRS (based on EFRAG Technical Advice).
5	Deletion of sector-specific standards requirement	<ul style="list-style-type: none">The proposal will delete the empowerment for the Commission to adopt sector-specific standards.
6	Assurance requirement changes	<ul style="list-style-type: none">Remove the possibility for the Commission to move from limited assurance to reasonable assurance requirement.Issue targeted assurance guidelines by 2026, not fixed date to adopt sustainability limited assurance standards.

Simplifying the CSDDD

Omnibus I and Omnibus II Proposals – Key changes proposed to the EU Taxonomy

#	Aspect	Proposed Change
1	Postponement of 1 year	<ul style="list-style-type: none">• Postponing, by one year, the transposition deadline (26 July 2027) and the first phase of the application of the sustainability due diligence requirements, covering the largest companies (to 26 July 2028).
2	Direct business Partner	<ul style="list-style-type: none">• Full due diligence is required with respect to the value chain beyond direct business partner only in cases where the company has plausible information suggesting that adverse impacts have arisen or may arise there.
3	Transition Plan	<ul style="list-style-type: none">• Removing the obligation to « put into effect » the transition plan, companies shall adopt a transition plan, including implementing actions which aim to ensure, through best efforts, the limiting of global warming to 1.5°C in line with the Paris Agreement.
4	Periodic assessment	<ul style="list-style-type: none">• Prolonging the intervals between two regular periodic assessments and updates from one year to 5 years.
5	Reducing the trickle-down effect	<ul style="list-style-type: none">• Limiting the information that companies within scope may request from their SME and small midcap business partners to the information specified in the VSME standard.
6	Financial services	<ul style="list-style-type: none">• Deleting the review clause on inclusion of financial services in the scope of the due diligence directive.
7	Civil Liability	<ul style="list-style-type: none">• Leaving national law to define whether its civil liability provisions override otherwise applicable rules of the third country where the harm occurs.
8	Financial Penalties	<ul style="list-style-type: none">• The Commission shall issue guidance for supervisory authorities to determine the appropriate level of penalties, the obligation of a maximum penalties not less than 5% of the worldwide turnover is removed.

Limiting the Scope and Amending the Content of the EU Taxonomy

Omnibus I and Omnibus II Proposals – Key changes proposed to the EU Taxonomy

#	Aspect	Proposed Change
1	Adjust the scope of EU Taxonomy	<ul style="list-style-type: none">• Reduce the scope of mandatory reporting.• EU Taxonomy only mandatory for entities in scope of CSRD and > €450m turnover.
2	Introduction of a materiality threshold	<ul style="list-style-type: none">• Exempt from assessing the eligibility and alignment of their economic activities that are not financially material for their business e.g. NFS: those not exceeding 10% of their total turnover or capital expenditure; FS: those not exceeding 10% of their total revenue (e.g. fees and commissions) or of their assets (loans, investments).• NFS: No alignment reporting requirement of OpEx KPI if eligible activities <25% total turnover.
3	Simplify the reporting templates	<ul style="list-style-type: none">• Simplification of summary KPIs into one template for non-financial undertakings.• Simplification of ‘per activity’ information by reporting one activity per row for Taxonomy-aligned activities.• Suppression of templates on the performance and exposures to fossil gas and nuclear activities.
4	Simplify the Green Asset Ratio (GAR) and other financial undertaking KPIs	<ul style="list-style-type: none">• Exclusion from the denominator of the GAR, exposures that relate to undertakings which are not under the future scope of the CSRD.• Trading book KPI and Fees and Commission KPI postponed until 2027.
5	Simplify the ‘Do no significant harm’ (DNSH) criteria	<ul style="list-style-type: none">• The focus is on streamlining requirements related to the use and presence of chemicals across all economic sectors.• Clarify the application of certain exemptions from EU environmental legislation.• Limiting the assessment to substances that have a harmonised classification and are included in the candidate list of substance of very high concern.







The EC has also launched a [consultation](#) on draft amendments to the Taxonomy Disclosures, Climate and Environmental delegated acts. The comment period for this consultation ends on 26 March 2025.




3. Industry Feedback



Omnibus vs European Contact Group Suggestions (1 of 2)




The European Contact Group (ECG) raised [10 suggestions](#) to the EC's recent considerations for simplifying reporting requirements in the CSRD, ESRS and EU Taxonomy Regulation. We have considered the Omnibus' impact on the ECG suggestions as follows:




#	Aspect	ECG Proposal	Omnibus
1	CSRD	<ul style="list-style-type: none">Split the group of large companies required to prepare sustainability reporting from 2025 ('Wave 2') into two categories of companies – larger and smaller – by revising the companies' thresholds for the application of the CSRD disclosure requirements. The new category of smaller companies in Wave 2:<ul style="list-style-type: none">a) Could report against a simplified version of ESRS.b) Could benefit from a delay in implementation, also allowing them to benefit from the possible outcome of an ESRS review (see below), should they wish to apply a revised ESRS 'Set 1' framework.	
2	CSRD	<ul style="list-style-type: none">Adjust the timeline of adoption of sectoral standards, if any, to at least allow EFRAG and the ISSB to work together and produce aligned sectoral requirements (rather than working in parallel and subsequently seeking interoperability).	
3	CSRD	<ul style="list-style-type: none">Extend the current transitional provisions allowed for companies with fewer than 750 employees to a greater scope of companies (Appendix C of ESRS 1), and/or for longer periods.	
4	CSRD	<ul style="list-style-type: none">Extend reporting reliefs to the disclosure of "own operations" data points, building on the transitional provisions in ESRS 1 in relation to the "value chain" data points, when a company is not able to provide a metric after making reasonable efforts.	
5	EU Taxonomy	<ul style="list-style-type: none">Introduce a materiality concept for reporting. This is a key general principle of reporting.	
6	EU Taxonomy	<ul style="list-style-type: none">Eliminate the OpEx KPI disclosure or make it optional, as its determination is complex, and it is not information used to determine the green asset ratio (GAR) of credit institutions or other financial institutions.	

- Key:
- Addressed 
 - Partially addressed 
 - Not directly addressed 

Omnibus vs European Contact Group Suggestions (2 of 2)

The European Contact Group (ECG) raised [10 suggestions](#) to the EC's recent considerations for simplifying reporting requirements in the CSRD, ESRS and EU Taxonomy Regulation. We have considered the Omnibus' impact on the ECG suggestions as follows:

#	Aspect	ECG Proposal	Omnibus
7	EU Taxonomy	<ul style="list-style-type: none">• Introduce an option to report an eligible activity as “not aligned”, with no requirement to perform an alignment assessment, in limited circumstances (i.e. allow nil alignment reporting rather than forcing to assess and determine alignment). This is particularly needed for:<ul style="list-style-type: none">– Non-financial sector: CapEx and OpEx KPIs of ‘type c’, such as purchases of (aligned) outputs. Screening every eligible expenditure against the EUTR criteria, in order to assess whether they qualify individually for alignment under one or more of the six environmental objectives, could be very burdensome. Many companies’ management systems currently are not capable of performing such an exercise swiftly.– Financial sector: collecting evidence from retail clients to support the alignment of retail exposures in determining the (banking) GAR is very burdensome, especially for the Minimum Safeguards (MS) criteria. More specifically, we suggest that the demonstration of compliance with MS of the use of proceeds by retail customers should not be required to determine alignment."	
8	EU Taxonomy	<ul style="list-style-type: none">• Revise the approach for determining the consolidated KPIs of groups with mixed activities. They should be based on the financial consolidation, and the templates to be presented should be those that reflect the predominant nature of the group. There should be no expectation created that a complete set of templates for each of the sectors of groups with mixed activities (non-financial, credit institutions, insurance, asset management and investment firms) should be included.	
9	EU Taxonomy	<ul style="list-style-type: none">• Scale back the EUTR reporting requirements to make them more operational. The technical screening criteria should be revised and not include any criterion that goes beyond other existing legislative acts. For instance, with respect to the DNSH relating to pollution, compliance with EU laws (e.g. REACH, ROHS) should be accepted as sufficient evidence to demonstrate alignment.	

- Key:
- Addressed 
 - Partially addressed 
 - Not directly addressed 

4. No Regret Moves: Continue to Action Sustainability Priorities



Key Trends in Sustainability for 2025

Emerging sustainability trends for 2025 reveal an evolving ESG landscape, shaped by political headwinds, investor demands for action, and the rising importance of AI, nature, and climate resilience.



Green Fatigue & Political Headwinds

ESG faces challenges as the new U.S. administration rolls back the green agenda amid rising political polarisation, forcing companies to navigate regulatory uncertainty and divergence whilst upholding long-term sustainability commitments.



Commercialisation of Low-Carbon Products

Green premiums are rising as leaders segment customers by willingness to pay, using Environmental Product Declarations (EPDs) and LCAs to finance Climate Funds backed by green bonds for the transition to net-zero.



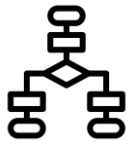
Prioritisation of Digital and AI

Companies will invest in digital tools to streamline ESG data management & reporting, with AI driving automation, predictive modeling, and risk assessment for better decision-making.



Decarbonisation: From Ambition to Tangible Action

Regulators and investors will increase pressure on companies to cut Scope 3 emissions, with 2025 marking a shift from commitments to measurable reductions.



Structuring for Success: Strengthening Accountability

CSRD is pushing sustainability teams toward compliance. Leaders are reviewing their operating models to ensure they have the right organisational set up and ownership to deliver on their priorities.



SBTi Updates Reshape the Carbon Removal Landscape

New SBTi guidelines expected in 2026 are expected to require carbon removals in net-zero strategies, driving demand for high-quality solutions and innovation in carbon management.



Climate Resilience Takes Centre Stage

Amid record-breaking temperatures, businesses will strengthen climate adaptation as extreme weather increasingly disrupts supply chains and operations.



Nature and Biodiversity Goes Mainstream

The EU's Nature Restoration Law will drive Irish businesses to embed biodiversity in decision-making, accelerating adoption of TNFD and SBTN frameworks.

No Regret Moves for Wave 1 Reporters

With your first ESRS-compliant report delivered, prioritise initiatives in 2025 to accelerate progress, resilience, growth, and lasting competitive advantage.



Double Materiality Assessment (DMA)

- Refresh the DMA to reflect significant business changes since the previous assessment, including acquisitions, disposals, new regulations, stakeholder engagement activities, and legislative updates.
- Leverage DMA insights to refine your sustainability strategy, prioritising efforts that drive business success while delivering positive environmental and societal impact.



Climate

- Strengthen internal management information supporting climate transition plan and climate action plan disclosures.
- Enhance energy management practices and encourage suppliers to adopt renewable energy solutions.
- Promote lower-carbon products to meet carbon reduction targets.
- Strengthen the existing climate scenario analysis and climate resilience analysis disclosures.



Nature & Biodiversity

- Continue assessing biodiversity-related dependencies, impacts, and risks.
- Evaluate alignment opportunities with the TNFD framework.
- Enhance internal biodiversity and nature-related capabilities.



Policies, Actions and Targets

- Benchmark disclosed policies, actions and targets against peers and consider any updates
- Focus DD policies enhancements on Tier 1 suppliers
- Create a clear action plan roadmap for 2025, ensuring timely completion of FY24 actions disclosed in FY24 ESRS statement.



Disclosures

- Review and evaluate FY24 disclosures of peer reporters, identifying priority enhancements for FY25.
- Revisit previously deferred 'phase-in provisions' topics and reconsider adoption timelines
- Review the FY24 EU Taxonomy assessment process to identify KPIs in scope for FY25+ based on Omnibus materiality thresholds.



Data, Process & Controls

- Improve processes to effectively capture, consolidate, manage, and report quantitative metrics.
- Strengthen data controls and validation procedures.
- Scope 3: Partner with suppliers to enhance data accuracy, prioritising verified supplier carbon footprint information.- Implement smart metering for energy, water and waste data collection.



Digital Enablement

- Automate ESG disclosure management processes.
- Digitise the Double Materiality Assessment (DMA) process.
- Develop a strategic digital architecture to enable long-term ESG goals.
- Create a unified sustainability platform for comprehensive reporting.
- Implement systems for supplier assessment and monitoring.



Operating Model

- Define an optimal operating model for sustainability.
- Clarify roles and responsibilities within Finance, Sustainability, and other relevant business functions.

No Regret Moves for Wave 2 Reporters

Now is not the time to slow down—it's the moment to stand out. Leading companies will seize this opportunity to drive meaningful progress and voluntarily align their FY25 disclosures with the CSRD.



Double Materiality Assessment (DMA)

- Complete the DMA and collaborate with your assurance provider to review and identify remediation gaps.
- Leverage DMA insights to refine your sustainability strategy, prioritising efforts that drive business success while delivering positive environmental and societal impact.
- Refresh the DMA to reflect significant business changes since the previous assessment.



Climate

- Establish a climate transition strategy and develop a qualitative climate action plan consistent with a 1.5°C ambition.
- Develop qualitative climate scenario analysis to support ESRS-aligned climate resilience disclosures. Explore quantitative measurement
- Enhance energy management practices and encourage suppliers to adopt renewable energy solutions.



Nature & Biodiversity

- Enhance internal biodiversity and nature-related capabilities.
- Evaluate biodiversity-related dependencies, impacts, and risks.
- Review alignment possibilities with the TNFD framework.



Policies, Action and Targets

- Focus on key policies that support climate and own workforce and a revised plan to update policies over the next 24 months
- Identify key actions for FY25 and FY26 that will allow for good quality disclosures on progress against IROs and targets in revised timeline
- Establish a process for setting targets in key areas such as climate and own workforce



Disclosures

- Align on reporting strategy for FY25 and FY26 including approach to separate sustainability statements.
- Consider dry-run exercises for metric reporting for FY25 to support identifying data and disclosure gaps.
- Conduct an EU Taxonomy eligibility activity assessment to confirm KPIs in scope based on Omnibus materiality thresholds.



Data, Process & Controls

- Conduct an assessment of data, process and controls for a subset of strategic metrics to determine remediation gaps.
- Build metrics into internal management reporting to build awareness and alignment
- Design, implement and embed strategic solutions to address gaps.
- Develop clear documentation of metric processes to streamline assurance activities.
- Enhance data control and validation systems.



Digital Enablement

- Explore options to automate ESG disclosure management processes.
- Develop a strategic digital architecture to enable long-term ESG goals.
- Digitise the Double Materiality Assessment (DMA) process.
- Create a unified sustainability platform for comprehensive reporting.



Operating Model

- Further refine the sustainability operating model.
- Continue defining roles and responsibilities clearly across Finance, Sustainability, and other relevant business functions.

No Regret Moves for Entities Expected to Fall Out of Scope

As others hesitate, companies committed to Sustainability will gain a competitive advantage. Climate inaction remains a critical financial risk, with extreme weather, supply disruptions, and resource scarcity set to intensify. Pressure from investors, banks, customers, regulators, and employees will continue to grow.



Sustainability Strategy

- Analyse FY24 reporting by comparable industry and sector organisations to identify key impacts, risks, and opportunities and understand priorities for peers, suppliers and customers.
- Leverage DMA insights, if completed, to inform sustainability strategy.
- Consider conducting a DMA-light or alternative sustainability strategy assessment to inform your strategic direction.



Climate

- Climate mitigation and adaptation remain core risks and opportunities.
- Develop GHG Inventory.
- Formulate a qualitative climate transition plan.
- Undertake qualitative climate scenario analysis.



Nature & Biodiversity

- Enhance internal biodiversity and nature-related capabilities, e.g. training.
- Consider performing a high-level biodiversity impact assessment.



Policies, Action and Targets

- Focus on key policies related to climate, people and governance that support information requests from customers and suppliers
- Determine whether setting targets in specific areas remain a strategic priority
- Explore transitioning to more energy-efficient, renewable solutions to identify potential cost savings.



Disclosures

- Evaluate voluntary reporting standards and frameworks and peer practices to inform approach to non-financial reporting.
- Align on reporting strategy for FY25+.



Data, Process & Controls

- Evaluate data, processes and controls for significant non-financial metrics where there remain strong stakeholder interest or other regulations, including Scope 1 & 2 emissions, Gender Pay Gap, and Adequate Wages.



Digital Enablement

- Consider establishing digital architecture aligned with sustainability objectives.



Operating Model

- Review and assess the current sustainability operating model in alignment with broader strategic ambitions.

5. Contact Us



Our Sustainability Reporting Experts

Our sustainability reporting experts are ready to support you in assessing the omnibus's impact and guide your next steps



Glenn Gillard

Sustainability Market Lead
ggillard@deloitte.ie



Gareth Martin

Managing Director
Sustainability Assurance
garmartin@deloitte.ie



Orla Dunbar

Director
Sustainability Data & Technology
odunbar@deloitte.ie



Jamie Schmidt

Assurance Lead Partner
jamischmidt@deloitte.ie



Aoife Connaughton

Director
Decarbonisation, Transition Planning &
Human Rights
aconnaughton@deloitte.ie



Marc Aboud

Director
Sustainability Risk
maboud@deloitte.ie



Ciaran O'Brien

Audit & Assurance Partner
ciobrien@deloitte.ie



Hollie Keating

Director
Sustainability Assurance
hokeating@deloitte.ie



Dorothy Maguire

Director
Sustainable Infrastructure
domaguire@deloitte.ie



Eileen Healy

Audit & Assurance Partner
ehaily@deloitte.ie



Christopher Hope

Director
EU Taxonomy
chhope@deloitte.ie



Emily O'Connor

Director
Sustainability Technical and
Regulatory SME
emiloconnor@deloitte.ie

Thought leadership

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EU Commission Omnibus: Key Developments for Irish Businesses



The European Commission has announced the details of the first of its Omnibus packages, which aim to simplify sustainability reporting requirements and boost competitiveness across the EU.

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IGAAP in Focus
European sustainability reporting
February 2025

IGAAP in Focus
European sustainability reporting
EU Commission proposes significant reduction in sustainability and due diligence reporting requirements

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This IGAP in Focus sets out several pieces of proposed legislation (omnibus proposal) that aim to reduce significantly the sustainability and due diligence reporting burden for entities and were published by the European Commission (EC) on 26 February 2025. These proposals form part of a package that also includes amendments to the Carbon Adjustment Mechanism (CBAM) and the InvestEU Regulation.

- The EC has published an omnibus proposal that aims to reduce significantly the sustainability and due diligence reporting burden for entities
- Under the proposal, the Corporate Sustainability Reporting Directive (CSRD) would only apply to entities with more than 1000 employees on average on their balance sheet date and with a turnover exceeding EUR 50 million or a balance sheet total exceeding EUR 25 million
- The proposal would also postpone by two years the effective date of the existing reporting requirements under the current CSRD for the second wave of large entities that are not in the first wave from 2025 to 2027 and the third wave (listed SMEs, small and non-complex credit institutions, and captive insurance and reinsurance entities) from 2026 to 2028
- The requirements in the Corporate Sustainability Due Diligence Directive (CSDDD) would also be simplified and reduced—the implementation date for phase one of the requirements would be delayed by one year to 2028
- Under the proposal, large entities with more than 1000 employees on average and a net turnover not exceeding EUR 450 million would not be required to comply with the EU Taxonomy Regulation. However, the EC would introduce an “opt-in” regime for these entities if they intend to claim that their activities are aligned or partially aligned with economic activities that qualify as environmentally sustainable under the Taxonomy Regulation. Large entities with more than 1000 employees on average and a net turnover exceeding EUR 450 million are required to report
- As part of the package, the EC has also launched a consultation on draft amendments to the Taxonomy Disclosures, Climate and Environmental delegated acts. The consultation period for this consultation ends on 26 March 2025
- As a next step, the EC’s proposals will be submitted to the European Parliament and to the European Council for scrutiny, under the EU’s ordinary legislative procedure. Once finalised and adopted, the legislation would enter into force after the publication in the EU Official Journal and need to be transposed into member state laws

For more information please see the following website:
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IGAAP in Focus
European sustainability reporting
February 2025

IGAAP in Focus
European sustainability reporting
Worldwide reach of the Corporate Sustainability Reporting Directive

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Independent assurance
Further information

On 26 February 2025, the European Commission (EC) published several proposed pieces of legislation (so-called ‘omnibus package’) that aim to reduce significantly the sustainability and due diligence reporting burden imposed by the Corporate Sustainability Reporting Directive (CSRD), the EU Taxonomy Regulation and the Corporate Sustainability Due Diligence Directive (CSDDD). Under the proposals, the CSRD would only apply to entities with more than 1000 employees on average on their balance sheet date and with a net turnover exceeding EUR 50 million or a balance sheet total exceeding EUR 25 million. The proposals would also postpone by two years the effective date of the existing reporting requirements under the current CSRD for the second wave of large entities that are not in the first wave from 2025 to 2027 and the third wave (listed SMEs, small and non-complex credit institutions, and captive insurance and reinsurance entities) from 2026 to 2028. The EC’s proposals will be submitted to the European Parliament and to the European Council for scrutiny under the EU’s ordinary legislative procedure. Once finalised and adopted, the legislation would enter into force after the publication in the EU Official Journal and would need to be transposed into member state laws. More information is available in our [IGAAP in Focus](#) on the omnibus package.

This publication reflects the CSRD as published in the EU Official Journal in December 2023, i.e. without taking into account the amendments proposed in the omnibus package. The publication will be updated once the proposals in the omnibus package are finalised.

This IGAP in Focus outlines the Corporate Sustainability Reporting Directive (CSRD), which was published in the Official Journal of the European Union (EU Official Journal), following its adoption by the European Parliament and European Council in December 2023.

- A key objective of the CSRD is to improve sustainability reporting in an entity’s management report for investors, civil society and other stakeholders
- The CSRD sets out the high-level sustainability information to be disclosed by entities in its scope
- The scope of entities subject to the CSRD is much wider than that of its predecessor the Non-Financial Reporting Directive (NFRD). In certain conditions are met, sustainability information in respect of non-EU entities not listed on an EU regulated market is required
- Exemptions are available for subsidiaries that meet specific criteria
- Reports need to be prepared using the European Sustainability Reporting Standards (ESRS). The first set of 12 ESRS has been published with further standards to be developed for specific sectors and for non-EU entities. Simplified standards for small- and medium-sized entities (SMEs) are also being developed
- The information provided is subject to mandatory limited assurance and mandatory digital reporting using digital tagging requirements yet to be finalised
- The requirements become effective in stages from 1 January 2024 to 1 January 2028, based on the characteristics of entities.

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European Commission Proposes Reduction in Sustainability Reporting and Due Diligence Requirements — Considerations for U.S. Entities

Background
On February 26, 2025, the European Commission (EC) published its proposed omnibus legislation that aims to significantly reduce the sustainability reporting and due diligence requirements for entities that are currently within the scope of the Corporate Sustainability Reporting Directive (CSRD), the EU Taxonomy (EUT), and the Corporate Sustainability Due Diligence Directive (CSDDD). Specifically, Omnibus I — COM(2025) 80 (‘Proposal I’) would postpone (1) the application of some reporting requirements in the CSRD and (2) the transposition deadline and application of the CSDDD. Omnibus I — COM(2025) 81 (‘Proposal II’) would modify the scope and reporting requirements of the CSRD, EUT, and CSDDD.

In This Issue

- Background
- Proposed Changes to the CSRD
- Proposed Changes to the EUT
- Proposed Changes to the CSDDD
- Next Steps for the Proposals
- Next Steps for U.S. Entities
- Contacts
- Appendix A — Impacts of Proposal I and Proposal II
- Appendix B — Decision Trees: CSRD and EUT Scope

* 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.

** Proposal for a Directive of the European Parliament and of the Council amending Directives 2006/43/EC, 2013/94/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements.”



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