

04 November 2025

Following the European Commission's request to revise the ESRS, corporate sustainability reporting requirements are entering a new phase of refinement. The potential shift toward interpreting the ESRS as a fair presentation framework could significantly influence the implementation of the CSRD.

ecoDa supports clearly framing the ESRS (Revised) as a fair presentation framework, to better align with the objectives of the CSRD and the underlying requirements of the ESRS. It will help prevent a check-the-box approach, enhance comparability across companies, and provide more flexibility for companies to use professional judgment (with concurrence from their auditor) on whether the information disclosed provides a true and fair picture of a company's sustainability performance and risks. Moreover, it encourages a forward-looking perspective, fostering more relevant reporting for stakeholders to be used in their decision-making process. It will also clearly put the ESRS on par with ISSB (also a fair presentation framework).

In contrast, the interpretation of the ESRS as a compliance-based framework has created undue challenges for the first wave of reporting companies, which were often required to report on topics they themselves assessed as not material.

ecoDa endorses clarifying that the ESRS serves as a fair presentation framework, helping issuers in their implementation, to strengthen the overall credibility and usability of sustainability disclosures in the EU.

About ecoDa: The European Confederation of Directors Associations (ecoDa) is an independent and unique umbrella organization representing the main national institutes of directors across Europe. Our member institutes collectively encompass around 50,000 individual directors from 24 countries, who serve on the boards of companies spanning various sizes and sectors. Our mission is to promote the highest standards of boardroom governance and to ensure that directors across Europe are well-equipped to meet the challenges and opportunities of their roles.

Contact details :

Beatrice Richez-Baum, Director General, ecoDa

contact@ecoda.eu

Tel : +32498502687

www.ecoDa.eu

Transparency register : 37854527418-86