

EFRAG Sustainability Reporting Board  
35 Square de Meeûs  
1000 Brussels, Belgium

Brussels, 02 February 2024

**Subject: ecoDa's reaction to the three draft EFRAG ESRS IG documents (EFRAG IG 1 to 3)**

Dear EFRAG Sustainability Reporting Board  
Dear Mr De Cambourg,

The European Confederation of Directors Associations (ecoDa) welcomes the three draft EFRAG ESRS IG documents and would like to take the opportunity of the related consultation to provide general comments.

ecoDa considers that guidelines in these areas are timely and necessary for the proper implementation of the ESRS standards.

They also provide useful information to board members in their oversight function on what is expected of management in terms of the ESRS implementation. However, since these documents are primarily directed to preparers and reviewers of the sustainability information and as such very operational, ecoDa has limited its comments to some general remarks.

First of all, ecoDa acknowledges the fact that the guidelines pinpoint questions identified on the market and will provide a useful basis even if certain gray areas remain that will only be clarified as practices evolve.

However, ecoDa's understanding from board members in companies less advanced in these matters, is that illustrative elements on what is expected in the base case would have been very useful to support companies more specifically through the main stages of the application of the ESRS : examples of the outcome / vizualisation of a value chain mapping, recommendations in terms of criteria to consider to assess financial and impact materiality, to define the thresholds, etc. These illustrations would serve as a form of beginners' toolkit, particularly for SMEs, helping kick-start the process and pending further sophistication as they would have been adopted internally. They would also have served as the minimum base case. Obviously, other organizations (notably audit firms) will develop templates and illustrations, adapted to the level of maturity of the various segments of the market, as was seen for IFRS standards (e.g. illustrative IFRS financial statements, with examples of footnotes), but these publications might not be released in a timely manner.

In addition, practical examples according to the sectors of activity would have been useful, especially since the publication of the specific sector standards has been postponed. The implementation of standards by an industrial company will differ from a service company.

We remain at disposal for any further discussion and thank you in advance for considering our comments.

With best regards,



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Director General, ecoDa



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