

Deadline

15 February 2027



Request for Input

Public Consultation Online Questionnaire

AGENDA CONSULTATION

2027-2029

OCTOBER 2026

Table of Contents

INTRODUCTION 2

Purpose of this consultation 3

How to provide feedback?..... 3

Structure of the questionnaire and consent to publication 4

PART 1 – SURVEY PARTICIPANT INFORMATION 5

PART 2 – SURVEY QUESTIONS 7

TOPIC 1: Strategic Direction and Balance of Sustainability Reporting Activities 8

TOPIC 2: Key Features of EFRAG’s Future Implementation Support Activities and Deliverables 11

*TOPIC 3: Stakeholders' Needs and Corresponding Technical Issues that Could be Addressed in EFRAG
Implementation Activities..... 12*

TOPIC 4: Priority Topics for Research on Emerging Trends and Issues 16

TOPIC 5: Other Comments..... 17



INTRODUCTION

Purpose of this consultation

Welcome to EFRAG's online questionnaire for the Agenda Consultation, intended to inform EFRAG's three-year workplan from mid-2027 onwards.

This consultation seeks stakeholder feedback on activities and priority topics to inform the development of EFRAG's workplan. It reflects the new reporting landscape created by the Omnibus I Directive. The consultation takes into account evidence from the first two reporting cycles of the largest companies, increasing interest in voluntary reporting, and ongoing developments in global sustainability reporting. It also builds on lessons learned from EFRAG's implementation support activities in 2024.

The Request for Input (RFI) seeks input from all stakeholders interested in sustainability reporting on:

- a) the strategic direction and balance of sustainability reporting activities,
- b) the key features of future implementation support activities and deliverables,
- c) the stakeholders' needs and corresponding technical issues that could be addressed in implementation activities, and
- d) priority topics for research on emerging trends and issues.

How to provide feedback?

This [questionnaire](#) is a tool for providing structured feedback on the RFI and does not reproduce the content of the RFI in full. Each topic in the questionnaire includes a short background summary for convenience, but respondents should read the relevant section(s) of the RFI before answering. Where a question refers to a specific paragraph, section or table of the RFI, please consult that reference directly. If you wish to comment on an aspect of the RFI that is not covered by a specific question, please use the "Other comments" question at the end of the questionnaire. The RFI can be downloaded [here](#).

You can save a draft of the survey and return to it at a later time, by clicking the 'Save and continue later' button in the top right corner of the page.

Please submit your answers by 15 February 2027 at 6pm CET by clicking on the 'Submit' button at the bottom of the survey. EFRAG will only consider responses for which the 'Submit' button has been used.

EFRAG encourages online submissions as this will support a more efficient and rapid analysis of feedback. However, EFRAG will also accept comment letters submitted by email to SRagenda@efrag.org.

Finally, for any technical queries about the survey, please contact SRagenda@efrag.org



Structure of the questionnaire and consent to publication

This online questionnaire is structured in two parts:

Part 1 – Survey participant information

Part 2 – Survey questions

- Topic 1 – Strategic direction and balance of sustainability reporting activities
- Topic 2 – Key features of EFRAG future implementation support (IS) activities and deliverables
- Topic 3 – Stakeholders' needs and corresponding technical issues that could be addressed in EFRAG implementation activities
- Topic 4 – Priority topics for research on emerging trends and issues
- Topic 5 – Other comments

Fields marked with * are mandatory.

You will receive an email confirming receipt of your response upon submission. Please check your spam folder if you do not see the confirmation email.

EFRAG's due process procedure requires the publication of a feedback statement.

Do you provide your consent to publish your responses? *

Please select 'No' below if you do not want your responses to be made public; in this case, your feedback will be treated anonymously.

☐ Yes

☐ No



PART 1 – SURVEY PARTICIPANT INFORMATION

1) First name:*

2) Last name:*

3) Name of the organisation:*

4) Email:*

5) Country:*

6) Which of the following stakeholder types do you represent?*

Company (Preparers)

- ☐ Preparer (except financial institutions)
- ☐ Business association (except association of financial institutions)

Users

- ☐ Investor
- ☐ National supervisory authority or regulator
- ☐ User (analyst, data provider, rating agency, etc.)
- ☐ User Association

Financial institutions

- ☐ Bank
- ☐ Asset manager/Investor



☐ Insurance

☐ Association of financial institutions

Other stakeholders

☐ Consultant (including software vendor)

☐ Assurance provider

☐ (National/Jurisdictional) standard setter, regulator or supervisory authority

☐ NGO

☐ Trade unions

☐ Academia

☐ Other - Write In: _____

7) For preparers, which of the following best describes your organisation?

☐ In scope of mandatory ESRS reporting.

☐ A third-country undertaking (or EU subsidiary/branch thereof) in scope of ESRS-40a.

☐ A non-SME company outside the scope of the CSRD

☐ An SME

☐ None of the above / not applicable.

8) If none of the above, please specify.

9) For preparers, which of the following best describes your sector?

☐ Accommodation and food service activities

☐ Activities of extraterritorial organisations and bodies

☐ Administrative and support service activities

☐ Agriculture, forestry and fishing

☐ Arts, sports and recreation



- ☐ Construction
- ☐ Electricity, gas, steam and air conditioning supply
- ☐ Financial and insurance activities
- ☐ Human health and social work activities
- ☐ Manufacturing
- ☐ Mining and quarrying
- ☐ Oil and gas
- ☐ Other service activities
- ☐ Professional, scientific and technical activities
- ☐ Publishing, broadcasting, and content
- ☐ Real estate activities
- ☐ Transportation and storage
- ☐ Telecommunication, computer programming, consulting, computing infrastructure and other information service activities
- ☐ Water supply, sewerage, waste management, and remediation activities
- ☐ Wholesale and retail trade
- ☐ Other - Write In: _____



PART 2 – SURVEY QUESTIONS

The background and context provided under each topic below is a summary for convenience of the online questionnaire only. Respondents are encouraged to consult the full RFI for complete information, including the detailed tables, before answering.

TOPIC 1: Strategic Direction and Balance of Sustainability Reporting Activities

Background and context

Section A of the RFI describes EFRAG's strategic direction for its sustainability reporting (SR) pillar structured around four strategic axes: (i) implementation of 2026 standards, (ii) the voluntary reporting ecosystem, (iii) international influence and interoperability, and (iv) ESRS Knowledge Hub as a delivery channel (*Table 1 of the RFI*). These strategic axes translate into concrete activities (*paragraph 17 of the RFI*):

1. standard setting;
2. influencing international developments and facilitating interoperability;
3. providing implementation support for mandatory and voluntary reporting;
4. digitalisation and ESRS Knowledge Hub; and
5. research on emerging trends and issues.

Questions

10) Do you agree with the proposed strategic direction described in Section A (*paragraphs 14 and 15, and Table 1 of the RFI*)?

☐ Yes.

☐ No.

11) If not, what would you change?

12) Do you agree with the content of the proposed EFRAG sustainability reporting activities? (*paragraphs 16-35 of the RFI*)

☐ Yes.

☐ No.



13) If not, what would you change? Please indicate the activity concerned and describe the change you would propose.

1. Standard setting,
2. influencing international developments and facilitating interoperability,
3. mandatory and voluntary reporting implementation support,
4. digitalisation and ESRS Knowledge Hub, and
5. research on emerging trends and issues.

EU repository and distribution hub for Voluntary Standard (VS) reports

EFRAG is implementing a repository in the Knowledge Hub to store VS reports to enable visibility. To complement the repository, stakeholders have asked EFRAG to consider a distribution hub function, allowing companies to transfer VS disclosures to their banks, investors and business counterparts through a direct, confidential channel. Paragraph 30(a) of the RFI describes an additional possible distribution function for these reports (i.e. through a confidential channel), the options for it and its advantages, risks and resource implications:

- Step (i) Repository: EFRAG operates a repository for analytical purposes, giving access only to reports made public, and complementing national platforms (which can connect to the EFRAG repository through APIs). Where no national platform exists, companies and counterparties can use the EFRAG service directly. This is EFRAG's current working assumption.
- Step (ii) Additional distribution function: In addition to the repository, EFRAG can provide a central distribution hub as a channel for the bilateral distribution of VS reports to all interested stakeholders, either publicly or on a confidential basis.

14) What are your views on such a distribution function? (paragraph 30 of the RFI)

15) How could countries where such platforms already exist be connected to gain benefits from it?

16) In what way could EFRAG support the uptake across the EU of the good distribution practices that already exist in some EU countries where similar national platforms already operate?



Balance of activities (second half of 2027 to end of 2029)

Table 2 of the RFI sets out the proposed balance of activities from July 2027 to the end of 2029:

Activity	Capacity	Rationale
1) <i>Standard setting</i>	5%	No activities are expected after the finalisation of ESRS-40a at the beginning of 2027. Should unexpected amendments arise, EFRAG will revise the allocation accordingly and deprioritise the research (item 5).
2) <i>Influencing international developments and facilitating interoperability</i>	15%	Preserve or increase high level of interoperability for the benefit of reporting companies (avoid double reporting) and users (comparability). Safeguard sources of entity-specific disclosure that are compatible with the European context. Allow Europe to be influential and speak with a single voice.
3) <i>Mandatory and voluntary reporting implementation support</i>	50%	Mandatory reporting: Based on the interviews conducted, a lower level of support is expected to be required by companies within the scope of the CSRD. This expectation can reasonably be attributed to the experience gained during the initial years of reporting, as well as to the simplification of ESRS. Once some market practices emerge, only selected issues will be addressed (including AFE and support to ESRS-40a), following a clear indication from stakeholders. Maintenance work for interoperability maps. Support to the EC on international equivalence. Maintenance of the monitoring system and regular dialogue with stakeholders. Voluntary reporting: Continuation of Forum and Community work for SMEs, with dedicated support material, mapping, etc. Enhanced coordination of Member State initiatives. Starting of ecosystem for non-SME companies that have been scoped out from mandatory reporting. Continuous dialogue with interested parties and monitoring mechanism. Effort reflects the diversified population and corresponding diversified engagement channels. Mandatory and voluntary reporting: Issuance of videos and packaged educational material with different levels of detail, from introduction to the standard to deep dives into specific disclosures and illustrations.
4) <i>Digitalisation and Knowledge Hub</i>	15%	The EFRAG Knowledge Hub is the European online portal identified in the CSRD, serving both mandatory and voluntary reporting. Enabling efficient reporting, ensuring accessibility (including languages) and navigation of legal text and issued material is an essential part of lowering the barriers and costs of reporting. Maintenance of XBRL, in combination with AI, and providing support and guidance for preparers that will digitalise their sustainability statements for the first time. Implementation of the basic Knowledge Hub repository is included. Distribution hub for voluntary reports not included, pending the outcome of this consultation (i.e. on the interest from stakeholders) and availability of resources.
5) <i>Research on emerging trends and issues</i>	15%	Research on emerging issues supports EFRAG's ambition to provide thought leadership and to anticipate future developments in sustainability reporting. Capacity allocated to this activity will,



		however, be balanced against the delivery of other more pressing priorities, should there be a need to reallocate efforts. A minimum capacity of 5% will stay in any case to secure this research.
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17) Do you agree with the proposed balance of activities presented in *Table 2 of the RFI*? For each activity, please indicate in the table below whether you agree with the proposed allocation, or whether it should be increased or decreased.

Activity	Agree	Increase	Decrease
Standard setting	()	()	()
Influencing international developments and facilitating interoperability	()	()	()
Mandatory and voluntary reporting implementation support	()	()	()
Digitalisation and ESRS Knowledge Hub	()	()	()
Research on emerging trends and issues	()	()	()

18) Please explain the reasons for those changes.

TOPIC 2: Key Features of EFRAG's Future Implementation Support Activities and Deliverables

Background and context

Section B of the RFI describes the proposed design of EFRAG's future Implementation Support System (ISS), including its objectives (facilitating consistent implementation of ESRS, ESRS-40a and the VS; supporting and incentivising voluntary reporting; and providing education and capacity-building), its four steps (collecting needs from stakeholders through a Monitoring System; assessing which needs EFRAG will address; developing implementation support activities through due process; and delivering outputs to stakeholders), and its deliverables (standard setting notices, clarifications, implementation resources/tools, and educational material).



Questions

19) Do you agree with the replacement of the Q&A mechanism with a Monitoring System, and with the proposed key features (objectives, steps) of future implementation support activities and deliverables? (paragraphs 41 and 42, and Table 3 of the RFI)

☐ Yes.

☐ No.

20) Please explain your views.

21) Do you agree with the decision not to carry forward the existing guidance (Implementation Guidance 1 and 2, and the issued ESRS Q&A Platform Compilation of Explanations), and not to address the questions received that were unaddressed before the ESRS simplification? (paragraph 51 of the RFI)

☐ Yes.

☐ No.

22) Please explain your views.

23) Regarding the VS, do you consider that EFRAG should differentiate between implementation support developed for SMEs and implementation support for non-SME companies outside the scope of the CSRD?

☐ Yes.

☐ No.

24) Please explain your views.



TOPIC 3: Stakeholders' Needs and Corresponding Technical Issues that Could be Addressed in EFRAG Implementation Activities

Background and context

Section C of the RFI includes a shortlist of reporting themes that could be added to EFRAG's 2027-2029 workplan and provides contextual information on potential implementation support for mandatory standards (ESRS and ESRS-40a), voluntary reporting, and non-SME companies outside the scope of the CSRD.

Questions

Implementation support for mandatory standards

25) Do you support the issuance of implementation support material by EFRAG to promote consistent application of ESRS and of ESRS for certain non-EU undertakings (ESRS-40a) to help stakeholders in their implementation efforts?

☐ Yes.

☐ No.

26) Please explain your views.

27) For each theme in the list below (Table 4 of the RFI), please indicate your suggested level of priority for inclusion in the 2027-2029 workplan.

Theme	High	Medium	Low
Cross-cutting – Fair presentation	☐	☐	☐
Cross-cutting – Reliefs in sub-Chapters 5.4, 7.3, 7.4 and 7.7 of ESRS 1	☐	☐	☐
Cross-cutting – Top-down Double Materiality Assessment (DMA)	☐	☐	☐
Cross-cutting – Prevention, mitigation and remediation policies and actions in DMA	☐	☐	☐
Cross-cutting – General (illustrations, compilation of market practices, sector practices)	☐	☐	☐
Cross-cutting – Disclosure of information on the use of AI in the preparation of the reporting	☐	☐	☐
Environment (E1–E5) – Interaction between ESRS and EU policy and regulations (e.g. Taxonomy Regulation, Renewable Energy Directive, EU-ETS, CBAM, CRCF, ESPR)	☐	☐	☐



Environment (E1–E5) – Cross-topic nexus and integration (e.g. wastewater, maladaptation, just transition, pollution impacts on nature, microplastics/plastic waste)	()	()	()
Environment (E1–E5) – Measurement aspects related to metrics	()	()	()
Environment (E1–E5) – Reporting challenges (aggregation/disaggregation, value chain IROs)	()	()	()
Social (S1–S4) – Guidance on foundational concepts: positive impacts, risks and opportunities, and environmental nexus	()	()	()
Social (S1–S4) – Interaction and linkage between EU regulation (e.g. CSDDD, forced labour ban) and ESRS	()	()	()
Social (S1–S4) – S1 methodological guidance for S1 metrics	()	()	()
Social (S1–S4) – S1-9 and S1-15: methodological guidance on adequate wages and remuneration metrics	()	()	()
Social (S1–S4) – S4: guidance on end-users' scope and articulation with products and services	()	()	()
Governance – Entity-specific: cybersecurity	()	()	()

28) If your priority theme or topic is not included in the list above, please add it and explain your motivation below.

29) Regarding ESRS-40a: are there priority issues that should be added to the workplan?

() Yes.

() No.

30) If yes, please specify.

Implementation support for voluntary reporting

31) Which type of support for voluntary reporting should be added to the 2027-2029 workplan? For each theme below (*Table 5 of the RFI*), please indicate your suggested level of priority for inclusion in the workplan.

Theme	High	Medium	Low
Market acceptance report (annual tracking of VS uptake and perceived challenges/advantages)	()	()	()



Mapping of digital tools and platforms supporting voluntary sustainability reporting	()	()	()
Publication of market practices, illustrative examples and case studies	()	()	()
Support for national initiatives/platforms and an EFRA coordination role (via the Knowledge Hub or otherwise)	()	()	()

32) If your priority theme or topic is not included in the list above, please add it and explain your motivation below.

33) For each theme below (Table 6 of the RFI), please indicate your suggested level of priority for coverage by new VS support guides.

Theme	High	Medium	Low
Transition guidance from VS to revised ESRS	()	()	()
Future support guidance – sector guides (e.g. lists of material matters per sector)	()	()	()
Future support guidance – Scope 3 GHG emissions	()	()	()
Future support guidance – waste for shared office (B7)	()	()	()
Roll-out of webinars and awareness-raising testimonials on reporting	()	()	()
Publication on 'Advantages of voluntary reporting'	()	()	()
Accreditation system of training and educational materials on the VS	()	()	()
Verification of platforms' alignment with the VS	()	()	()

34) If your priority theme or topic is not included in the list above, please add it and explain your motivation below.

35) Subject to resource availability and decisions by EFRA's governance bodies, including an assessment of risks and liabilities, EFRA could establish quality labels for training offerings and digital platforms related to the VS. Would you agree that such labels, including those listed below, would help companies navigate the available options? Why or why not?

Accreditation system of training and educational materials. (Table 6 of the RFI)



Potential verification of platforms' alignment to the VS. (*Table 6 of the RFI*)

Other (please specify):

Non-SME companies outside the scope of the CSRD

36) What form of support would best meet the needs of non-SME companies outside the scope of the CSRD? Please explain.

37) In your view, for which reporting issues and practical challenges do non-SME companies outside the scope of the CSRD need EFRAG's support? Please explain.

TOPIC 4: Priority Topics for Research on Emerging Trends and Issues

Background and context

Section D of the RFI explains that research on emerging trends and issues would enable EFRAG to anticipate and respond proactively to developments in the corporate reporting landscape, informing EFRAG's future standard-setting or implementation support activities. The strategic aims of this research are articulated in EFRAG's due process procedures.

The RFI provides some concrete examples of what research on emerging trends and issues could include (see paragraph 59 of the RFI).

Given limited resources, EFRAG could realistically focus on one, or possibly two, issues for 2027-2029. Moreover, some of these issues could be addressed by joining forces with the Financial Reporting (FR) pillar, as done with the EFRAG connectivity discussion paper. EFRAG could also consider collaborating with external parties.

Thus, EFRAG is seeking feedback on (i) which topic(s) should be prioritised and added to the workplan and (ii) in which format (e.g. collaboration format).



Questions

In the proposed balance of activities, EFRAG would complement its standard-setting and implementation support role with research activities on emerging trends/issues.

38) Briefly describe the topic(s) that EFRAG should explore in the next three years, and indicate for the topic(s) in which format they should be explored (own research, collaboration with the FR pillar or other external parties, etc.).

TOPIC 5: Other Comments

Questions

39) Do you have any other comments or suggestions relating to the 2027-2029 workplan?



Thank you for taking our survey. Your contribution is very important to us.

You will receive an email with your submission in a few minutes. Please, also check your spam folder.

