

EFRAG Public Consultation – January 2024 - Questionnaire VSME Exposure Draft

1. DISCLAIMER

This questionnaire supports the development of the Exposure Draft for a Voluntary Standard for non-listed SMEs ('VSME ED'). The purpose of this consultation is to collect feedback from a variety of stakeholders on the content of its content.

The VSME ED is the result of EFRAG SRB and SR TEG and includes inputs from EFRAG Expert Working Group and the EFRAG VSME community as well as stakeholders outreach events. This work benefits from the research conducted by the SME working group "Cluster 8" of the EFRAG Project Task Force on European sustainability reporting standards.

The following background documents are included in the package to help respondents framing their responses:

Annex 1: VSME ED [link](#)

Annex 2: Basis for conclusions for VSME illustrating the reasoning behind the content of the ED [link](#)

Annex 3: Approach to Value Chain Cap in ESRS LSME ED and VSME ED [link](#)

Deadline for answer is 21 May 2024 (EoD)

2. SURVEY INTRODUCTION

Thank you for taking the time to complete this survey.

The purpose of this survey is to receive feedback from constituents on the VSME ED. The feedback will be collated by EFRAG Secretariat and analysed by EFRAG SR TEG and SRB to finalise the VSME draft for delivery to the European Commission ('EC').

Why VSME? EFRAG's work on a voluntary standard for non-listed micro, small and medium enterprises is outside the Corporate Sustainability Reporting Directive (CSRD).

As specified in the EC Q&A accompanying the adoption of the Delegated Acts ESRS in July 2023, EFRAG is developing simpler, a voluntary standard for use by non-listed SMEs to enable non-listed SMEs to respond to requests for sustainability information in an efficient and proportionate manner as well as to facilitate their participation in the transition to a sustainable economy. The EC SME Relief Package of September 2023 refers to the VSME ED as a measure to support SMEs in accessing sustainable finance and to reduce the reporting obligations by 25%.

The VSME ED will allow non-listed SMEs (including micro) to face growing requests for ESG data and to lower the entry barrier to reporting. Undertakings with no company statute (self-employed) are expected to use this VSME. The benefits of VSME will depend on market acceptance and recognition that the VSME ED is suitable to replace a substantial part of the various questionnaires (from lenders, corporates, investors) currently used to collect such information from SMEs.

Micro, small and medium undertakings are in number the vast majority of enterprises in Europe.

General approach to users' needs: When answering to the questions in this Survey and assessing the appropriateness of the proposed disclosures, respondents are invited to consider the perspective of the users' needs of this particular ED (users being primarily SMEs' business partners, i.e. lenders, other investors, corporates) and to take into account the capacities of the SMEs, especially as they are not in the scope of the CSRD. Such information is also expected to support the perspective of public interest.

In this questionnaire, if not differently specified, the terms "SMEs" and "undertaking(s)" refers to non-listed micro, small and medium undertakings in the scope of VSME ED.

If you have no opinion on a question you can skip the question.

3. INFORMATION ON SURVEY PARTICIPANT

First Name:

Stefano

Last Name:

Zambon

Email

info@fondazioneoibr.it

Organization:

Name of organization:

O.I.B.R. Foundation

Type of organization:

Preparers are identified as those which choose to prepare a sustainability report under the VSME ED.

Users are identified as those using the sustainability information produced by applying VSME ED (in particular those are investors, lenders, large undertakings as SME's value chain partners).

Other

Please specify whether you are:

Other (please specify)

“Other” respondents can choose to respond either as as Preparers (proxy) or as Users (proxy). In this case, in addition they can provide complementary comments to cover the other perspective, using the last open question in Part 2 of the questionnaire.

Please specify:

Civil society

Main country of operations:

Italy

Main sector of operations:

Services

Depending on the group you have selected, you will be asked different questions.

4. Survey structure and instructions

This survey is structured as follows:

A) Part 1: VSME ED – General key questions (CRITICAL, please consider answering all questions) (If you only wish to complete Part 3, please page through the questionnaire to there)

B) Part 2: VSME ED – Detailed questions on principles and datapoints in the 3 modules (ADDITIONAL, please complement your answers in part 1 by answering part 2 as much as possible) (If you do not wish to complete this part, please page through to Part 3 on the Value chain cap or the submission page as relevant)

C) Part 3: Value chain cap (Separate section on the role of VSME and LSME in respect to the trickle-down effect)value chain cap as determined by the ESRS LSME) (Please note that here you are requested to choose whether you want to respond in brief on this topic or in a more detail. Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.)

You can choose to answer any part on its own or combination with the other parts.

Survey instructions

Some questions in the survey will appear depending on your previous answers or choices. You will now be able to save your responses before final submission . Please note that EFRAG only considers completed surveys - partial submissions cannot be technically processed. You will receive an email with your response on submission.

5. A) Part 1: General key questions

A) PART 1: General Key Questions (CRITICAL)

a. Objective, simplifications and modules

Please refer to the text of VSME ED in [Annex 1](#) and to the text of Basis for conclusions for VSME ED in [Annex 2](#).

1. The objective of this ED is to provide a simple reporting tool, that can credibly replace a substantial part of the questionnaires used by business partners (lenders, investors and corporate clients) in requesting ESG data from SMEs and that can support SMEs in monitoring their sustainability performance. While the ED has been built mainly on the basis of questionnaires from business partners, the resulting information is expected to also benefit SMEs by improving their management of sustainability issues and, in this way, contribute to a more sustainable and inclusive economy.

Do you agree with this standard setting objective?

Yes

Please explain your answer:

The O.I.B.R. Foundation agrees with the objective outlined in the Exposure Draft (ED). The primary goal of offering a streamlined reporting tool is commendable, as it not only helps to consolidate and significantly reduce the plethora of questionnaires that SMEs typically have to go through from corporate clients but also empowers them in effectively tracking their sustainability performance.

2. VSME ED has been structured in three separate modules:

The Basic Module is the entry level for SMEs and the target for micro-SME; it is required also in case of use of one of the two other modules.

The Narrative-Policies, Actions and Targets (PAT) Module is expected to be used by SMEs that have already in place some formalised policies, actions and targets.

The Business Partners (BP) Module is expected to be used when an SME faces data requests from its business counterparties.

The following alternatives for reporting uses are possible under the VSME ED:

- 1) **The Basic Module alone;**
- 2) **The Basic Module with the Narrative-PAT Module;**
- 3) **The Basic Module with the Business Partners (BP) Module;**
- 4) **All three Modules together.**

Do you agree that these alternatives are appropriate to deal with the diversified undertakings in scope (both number of employees and economic sectors) in the context of the objective as stated in Q1 of this questionnaire?

Yes

Please explain your answer:

The O.I.B.R. Foundation supports the modular structure outlined in the VSME ED for sustainability reporting standards. This approach is notably effective in providing the necessary flexibility and autonomy that SMEs require to align with the ESRS standards

applicable to larger enterprises, yet tailored to their unique operational contexts and capabilities.

The optionality of combining these modules offers SMEs the flexibility to tailor their sustainability reporting to their specific needs, capacities, and stakeholder expectations. This modular approach not only facilitates SMEs' alignment with broader sustainability standards but also encourages incremental progress in their sustainability journey.

In essence, organizing sustainability reporting standards in this modular fashion ensures that SMEs of varying sizes and sectors can engage with sustainability practices at a level that is both feasible and meaningful for them.

3. **The Basic Module is written in simplified language to make it easily understandable for micro and SME undertakings, while ensuring clarity in terms defined by the ESRS with 12 disclosures to be reported. There is no need for a materiality analysis. Certain disclosures are required only if the undertaking considers them "applicable".**

Do you agree that the Basic Module is proportionate, understandable (in terms of language), and has a reasonably complete set of disclosures to be used as a starting point?

Please explain your answer:

The O.I.B.R. Foundation supports the Basic Module's approach for being proportionate, understandable, and providing a concise yet comprehensive set of disclosures as a viable starting point for micro and SME undertakings. Its simplified language ensures accessibility for businesses new to sustainability reporting, facilitating their integration into the sustainability framework. However, we do not agree with the choice of not requiring a materiality assessment which is one of the fundamental component in today's sustainability reporting to make sure users are provided with information they are looking for.

If answer is NO, please indicate the relevant disclosure.

4. The Narrative-Policies, Actions and Targets (PAT) Module is suggested in addition to disclosures in the Basic Module, to undertakings that have formalised and implemented PAT. Materiality analysis is required to determine and disclose the sustainability matters that which sustainability matters are relevant for the undertaking.

Do you agree with the content of and approach to the Narrative-PAT Module, which is reserved to undertakings that have Policies, Actions and Targets (PAT) in place?

Yes

Please explain your answer:

The O.I.B.R. Foundation fully endorses the content and approach to the Narrative-Policies, Actions, and Targets (PAT) Module as it logically extends the foundational disclosures of the Basic Module, facilitating a more nuanced articulation of an organization's sustainability strategy.

5. The Business Partners (BP) Module sets datapoints to be reported in addition to disclosures in the Basic Module, which are likely to be included in data requests from lenders, investors and corporate clients of the undertaking. Materiality analysis is required, in order to determine and disclose the sustainability matters that are relevant for the undertaking.

Do you agree with the content and approach to the Business Partners (BP) Module as a replacement and standardisation of information requests by business partners, being a proportionate but complete set of ESG disclosures?

Yes

Please explain your answer:

The O.I.B.R. Foundation agrees with the content and approach to the Business Partners (BP) Module as it effectively standardizes sustainability information requests SMEs are used at receiving by corporate clients, offering a comprehensive yet balanced set of disclosures. This modular approach is beneficial as it allows SMEs to align with standardized sustainability criteria, streamlining communication and potentially reducing the redundancy of multiple data requests.

6. QUESTIONS

A) PART 1: General Key Questions (CRITICAL)

b. Sector guidance

6. Sustainability matters may be highly dependent on the specificities of the relevant sector(s) that the reporting undertaking operates in. Please select your recommended course of action for standard setting and guidance purposes on this matter.

Please note that your answer will be complemented by question 13 on the additional dimension of reporting including sectors.

Please select one:

Undertakings applying VSME ED should apply on a voluntary basis sector specific guidelines and disclosures applicable to both listed and non-listed SMEs, to be issued by EFRAG as a non-authoritative annex to the future sector-ESRS.

Please provide your comments, if any:

Sector-specific guidelines and disclosures are fundamental to capture the sustainability performance of companies, SMEs included. It is important thought to make sure that the possible related guidelines and disclosures will already include proportionality mechanisms (eg, without undue costs and efforts) to make sure that costs would not exceed benefits and hence, discourage SMEs in reporting on their sector specificities.

7. B) Part 2: Detailed questions on principles and datapoints

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

a. Principles for preparation

Please refer to the text of VSME ED in [Annex 1](#).

7. Do you agree with the proposed Principles for the preparation of the sustainability report in VSME ED?

Principles for the preparation of the sustainability report (Basic Module, Narrative-PAT Module, Business Partners Module)

	Please select:		Comment
	Agree	Disagree	
a) Complying with this Standard (paragraphs 9 and 10 in VSME ED)	X		
b) Preparation on a consolidated basis (paragraph 12 in VSME ED)	X		
c) Timing and location of the Sustainability Report (paragraphs 13, 14 and 15 in VSME ED)	X		The O.I.B.R. Foundation fully agrees with the flexibility and autonomy granted to SMEs by Disclosure 14, on deciding where and how to place the sustainability report, even allowing for it to be drafted as a standalone document, is a commendable approach. For SMEs this would mean that they can continue for example to adopt other reporting tools such as Integrated Report.
d) Classified and sensitive information, and information on intellectual property, know-how or results of innovation (paragraph 16 in VSME ED)	X		

If you disagree please explain your reasoning:

Please select a principle:

Explanation:

8. Additional question on Preparation on a consolidated basis. The VSME ED recommends the undertakings that are parent of small and medium sized groups to prepare consolidated reports for their sustainability statement, i.e. to include data of their subsidiary/ies in the report.

Do you agree with this approach?

Yes

Please explain your answer:

An extension of the sustainability statement to consolidated reports for sustainability statement of these subsidiaries would positively affect them to think about their sustainability performance. As previously mentioned, in order not to make this too burdensome, proportionality mechanisms should be embedded in the standards.

9. Since non listed SMEs are outside the scope of CSRD, the subsidiary exemption (see CSRD Art. 19a9) does not apply to them. One proposal that EFRAG could consider is to include such exemption in VSME ED, as a further incentive to apply consolidated sustainability reporting.

Would you consider the inclusion of a subsidiary exemption to VSME ED as pertinent and feasible?

Yes

Please explain your answer:

10. Additional information component including sectors (VSME ED par. 11, applicable to all the modules) Depending on the type of activities carried out, the inclusion of additional information about issues that are common to the undertaking's sector supports the provision of relevant, faithful, comparable, understandable and verifiable information. While acknowledging the difficulties that this requirement may raise for SMEs, the inclusion of this additional dimension was considered an important element of VSME ED to fulfil in particular-sector specific disclosures.

Do you agree with this approach?

Yes

Please explain your answer:

The O.I.B.R. Foundation agrees that the inclusion of sector-specific disclosures could further benefit the comparability of information which is a fundamental aspect for all companies, despite their size.

8. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

b. Basic Module

11. The Basic Module is the entry level for non-listed SMEs and has a highly simplified language. Ideally the undertaking should be able to produce these disclosures with limited help of consultants. It comprises 12 disclosures which have been mapped with existing voluntary initiatives (i.e. Nordic Sustainability reporting standards for SMEs, German Sustainability Code, CDP guide for SMEs etc.). These disclosures have been identified as recurring in the questionnaires analysed by the EFRAG Secretariat (please refer to *Annex 2 Basis for conclusions for VSME ED* for more details).

With reference to the proposed disclosure requirements, please include your answer in table below:

	Do you have comments on the inclusion and content of this disclosure?
Disclosure B 1 – Basis for Preparation	
Disclosure B 2 – Practices for transitioning towards a more sustainable economy	
B 3 – Energy and greenhouse gas emissions	For SMEs, accurately calculating energy and greenhouse gas emissions is not a straightforward task. The guidelines provided in the VSME ED, while comprehensive, tend to be complex and technical, making it challenging for SMEs to apply them independently. While recognizing the importance of these metrics in carbon footprint reporting, it appears that outsourcing the calculation to specialized third parties might be the only feasible solution.
B 4 – Pollution of air, water and soil	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 5 – Biodiversity	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 6 – Water	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 7 – Resource use, circular economy, and waste management	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 8 – Workforce – General characteristics	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 9 – Workforce - Health and Safety	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 10 – Workforce – Remuneration, collective bargaining, and training	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 11 – Workers in the value chain, affected communities, consumers and end-users	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.
B 12 – Convictions and fines for corruption and bribery	The O.I.B.R. Foundation agrees with the approach of making these disclosures mandatory for VSME in order to further enhance comparability of information and making sure also these companies can adopt a reliable approach towards sustainability.

1 - This datapoint was not identified in any of the questionnaires analysed by EFRAG Secretariat but was inserted to keep consensus based on the recommendation by some EFRAG SRB members.

12. B3 to B7 require disclosure of environmental performance metrics. There are other schemes used by SMEs requiring reporting of similar metrics, such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009).

Do you see any potential for better alignment with those other reporting schemes?

No

Please explain your answer:

13. The guidance provided for B9 on the number of fatalities as a result of work-related injuries and work-related ill health refers to incidents arising during travel and, outside of the undertaking's responsibility (e.g. regular commuting to and from work). These incidents are subject to the applicable national legislation that regulates their categorisation as to whether these are work-related or not.

Is the practice in your country to include such incidents as work-related fatalities?

Please explain your answer including references to the relevant legislation.

According to the applicable Italian national legislation, fatalities resulting from work-related injuries and work-related ill health, i.e., incidents occurring during travel, are to be included among work-related fatalities if they arise in the context of work activities or missions authorized by the employer. However, incidents outside of the undertaking's responsibility, such as regular commuting to and from work, are not typically considered work-related fatalities unless specific conditions defined by the legislation or the employer's insurance policies are met.

14. B10 (a) requires undertakings to disclose the relevant ratio of the entry level wage to the minimum wage, when a significant proportion of employees are compensated based on wages subject to minimum wage rules. This datapoint deviates from the disclosure requirement on adequate wages established in ESRS S1-10 – Adequate wages (from paragraphs 67 to 71) as a simplification (i.e., easier to collect).

Do you consider that this requirement will provide relevant and comparable information?

Yes

Please explain your answer:

The O.I.B.R. Foundation consider this requirement appropriate. However, we think that this metric should be extended towards all company levels (including apprentices). In Italy, apprenticeship contracts are the recommended ones for young entrants, who should receive the same salary and benefits as other employees.

15. B11 was drafted to cover, in a simplified way, a description of the process to identify material impacts and a description of those for workers in the value chain, affected communities and consumers/end-users. This disclosure is an exception to the general approach in the Basic Module where materiality does not apply. As a compromise, it was included as a voluntary disclosure.

Do you agree with this approach?

Yes

Please explain your answer:

16. In order to help SMEs prepare the sustainability report, specific guidance has been developed for the Basic Module in paragraphs 87 to 167 of the VSME ED.

Do you think that it is useful for the preparation of the report? Do you think it is sufficient?

Yes

Please explain your answer or add suggestions:

However, the O.I.B.R. Foundation would also recommend the development of ad-hoc guidelines or at least making sure that free of charge tools to calculate environmental-related disclosures and metrics are made available.

9. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

c. Approach to materiality of matters and Principles for preparation (common to Narrative-PAT and Business Partners Modules)

17. Do you think that the language and approach to the Principles of Materiality to be applied to the Narrative-PAT Module and Business Partners (BP) Module are proportionate for the undertakings in scope? Please include your feedback in the table below:

	Please select:		Comment
	Agree	Disagree	
Impact materiality (paragraphs 46-50 in VSME ED)	X		
Financial materiality (paragraphs 51-55 in VSME ED)	X		However, the O.I.B.R. Foundation recommends EFRAG to better simplify the first sentence in para. 51 "From a financial perspective, a sustainability matter is material if it pertains to financial risks that could be reasonably expected to have material financial effects materially influencing", where the term 'material' is mentioned too many times, thus impairing the understanding of what should really be material (matter and information).
Stakeholders and their relevance to the materiality analysis process (paragraphs 56 and 57 in VSME ED)			

18. The VSME ED requires performing a materiality analysis in order to disclose which of the sustainability matters listed in Annex B of VSME ED (which is the same as AR 16 of ESRS 1 General requirements) are material to the undertaking. Therefore, users will understand for which material matters the undertaking does not have Policies Actions and Targets (PAT) in place. This approach (like for ESRS Set 1) is designed to have a reliable depiction of what the undertaking is doing to address sustainability matters, avoiding greenwashing. At the same time, this approach only requires reporting the PAT (Policies, Actions and Targets) that the undertaking has in place. No information is required when they have no PAT in place for a material matter (in addition to the list of material matters itself).

In the VSME ED, the Narrative-PAT and Business Partners Modules require assessing the materiality of the matters, as it considers the disclosure of only material matters as essential information for users. Do you agree with this approach?

Yes

Please explain your answer.

By not requiring further information on Narrative-PAT for non-material matters, it streamlines the reporting process, making it more manageable for SMEs.

19. As a way to simplify the materiality approach, whenever possible the notion of “report only if applicable” has been introduced. This filters information to be reported by undertakings on the basis of relevance. No disclosure is expected for a specific datapoint, when the undertaking’s circumstances are different from those that would trigger disclosure of that specific datapoint, as described by the relevant provision in VSME ED. This is particularly important for the Basic Module, where no materiality analysis is foreseen and all the disclosures are to be reported, if applicable.

Disclosures in the Business Partners module are to be reported are to be reported if they are applicable and for BP 5,7, 8, 9, 10 (for which the "if applicable" approach would not work) if they are relevant to the undertaking's business and organisation.

Do you agree with this approach?

No

Please explain your answer:

While important, especially in the Basic Module, the notion of 'report only if applicable' opens up the question of what are the criteria according to which 'applicable' is adopted (or not). A further effort should be made to explain the difference between 'applicable' and 'material' in order to avoid too vague disclosures when companies decide to implement this mechanism (in particular for the Basic Module).

20. Financial opportunities have been included only on an optional basis in VSME ED since the CSRD focused on negative impact when addressing SMEs.

Do you agree?

Yes, reporting for financial opportunities should be optional

Please explain your answer:

The O.I.B.R. Foundation thinks that it is important to have a balance view of both financial risks and opportunities.

21. Do you agree with the proposed principles for the preparation of the sustainability report for the Narrative-PAT and Business Partners Module in VSME ED?

Principles for the preparation of the sustainability report (Narrative-PAT Module, Business Partners Module)

	Please select:		If you disagree please explain your reasoning:
	Agree	Disagree	
a) Time horizons (paragraph 40 in VSME ED)		X	In order to allow better flexibility, we would encourage to include in this section and accordingly to ESRS 1, the possibility for companies to define themselves their time horizons.
b) Coherence and linkages with disclosures in financial statements ((paragraph 41 in VSME ED)	X		Para. 41 refers to 'other regulatory reports' while this section only focuses on the financial statements. We would suggest to delete this expression to avoid confusion.

Please add your comments, if any:

10. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

d. Narrative-Policies, Actions and Targets (PAT) Module

22. Do you agree with the content of the disclosures required by the Narrative-PAT Module of VSME ED? Please refer to Annex 2 Basis for conclusions for VSME ED for further detail. Please include your feedback in the table below:

	Do you have comments on this disclosure?
Disclosure N 1 – Strategy: business model and sustainability related initiatives	
Disclosure N 2 – Material sustainability matters	
Disclosure N 3 – Management of material sustainability matters	
Disclosure N 4 – Key stakeholders	
Disclosure N 5 – Governance: responsibilities in relation to sustainability matters	

23. N3 requires the disclosure of policies, actions and targets to manage material sustainability matters. There are other schemes used by SMEs requiring reporting of similar information, such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009) regarding environmental policies, actions and targets.

Do you see any potential for better alignment with those other reporting schemes?

No

Please explain your answer:

11. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

e. Business Partners (BP) Module

24. While acknowledging the complexities of this calculation specifically for SMEs, the inclusion of greenhouse gas (GHG) Scope 3 emissions as the entity-specific dimension was considered an important element of disclosure in some sectors. The Business Partners Module includes an entity specific consideration for GHG Scope 3 emissions to guide undertakings in certain sectors and for which Scope 3 GHG emissions are material in addition to the disclosures envisaged in B3 Energy and GHG emissions (Basic Module).

Do you agree with the inclusion of GHG Scope 3 emissions in the Business Partner Module in the paragraph “Entity specific consideration when reporting on GHG emissions under B3 (Basic Module)”?

Yes

Please explain your answer:

As previously mentioned, it is critical also for these companies to make efforts towards the disclosure of GHG emissions. However, in order to support them in their journeys, free of charge calculation tools should be made available at a national/EU level.

25. Do you agree with the content of disclosures required by the Business Partners (BP) Module of VSME ED? Please note that you can find the background for each Disclosure in the Annex 2 Basis for conclusions for VSME ED (BC130. to BC149). Please include your feedback in the table below:

	Comment:
Disclosure BP 1 – Revenues from certain sectors	The O.I.B.R. Foundation agrees with the content of these disclosures as they align, without being too burdensome, to the ones required by the companies that fall within the scope of the CSRD.
Disclosure BP 2 – Gender diversity ratio in governance body	
Disclosure BP 3 – GHG emissions reduction target	
Disclosure BP 4 – Transition plan for climate change mitigation	
Disclosure BP 5 –Physical Risks from climate change	
Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio	
Disclosure BP 7 – Alignment with internationally recognized instruments	
Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations	
Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO Declaration and the International Bill of Human Rights)	
Disclosure BP 10 – Work-life balance	
Disclosure BP 11 – Number of apprentices	

26. With reference to disclosures BP 7, BP 8 and BP 9, the objective of these three disclosures is to assess the SME’s commitment to respecting human rights. The ED has used the terms in the Sustainable Finance Disclosures Regulation (SFDR), applicable to the financial market participants (for example banks), for consistency purposes.

Are there alternative disclosures covering the same objective regarding the human rights of own workforce and that are more suitable than these disclosures?

No

Please explain your answer including updated/proposed text:

27. Do you think that it would be beneficial to split the Business Partners (BP) Module into sub-modules depending on the nature of the user (for example “banks”, “investors”, “large corporates”)?

Please select:

Yes

Please explain your answer:

This further classification enhances, on the one hand, to better capture the specific information required by these users, and on the other one SMEs to understand and respond to their information needs.

28. Some of the questionnaires of banks and other business partners analysed by EFRAG Secretariat included also datapoints related to the EU-taxonomy regulation, despite non-listed SMEs being out of scope. EFRAG considered that preparing this information would be too complex for non-listed SMEs. We note that the EU Platform for Sustainable Finance may in the future make a proportionate tool for EU-taxonomy available. In particular, to meet the technical criteria for inclusion in the climate mitigation taxonomy, large undertakings have to consider the greenhouse gas (GHG) emissions of their various economic activities. These undertakings will need data from their suppliers. Small and medium-sized enterprises (SMEs) playing a crucial role in these undertakings' supply chains may be asked to provide the following information voluntarily to streamline the process for themselves and their clients:

SMEs whose activities fall under enabling activities of the Climate Delegated Act, e.g., categories 3.6 (Manufacture of renewable energy technologies) or 9.1 (Market research, development and innovation), should disclose the emission savings of their technology compared to the best-performing alternative.

Do you think that VSME ED should include this additional datapoint to cover EU-Taxonomy disclosures?

No

Please explain your answer:

The O.I.B.R. Foundation thinks that EFRAG should move at the same pace of the EU Platform for Sustainable Finance. Once that proportionate tools are issued, then EFRAG can possibly develop ad hoc guidances.

29. In order to help SMEs prepare their sustainability report, specific guidance has been developed for the Business Partners Module in paragraphs 169 to 193 of the ED.

Do you think that it is useful in the preparation of the sustainability report? Do you think it is sufficient?

Yes

Please explain your answer:

However, we would encourage EFRAG to make sure these companies can benefit from additional free of charge tools, especially when it comes to environmental-related disclosures.

30. Please provide any further comments not addressed in part 1 or 2 of the questionnaire here:

31. If you want to provide additional comments on aspects not covered in the questionnaire, please upload your file here.

12. C: Part 3: Value chain cap (Separate section on the value chain cap as determined by the ESRS LSME)

Non-listed SMEs receive data requests from large undertakings, including due to reporting obligations in the CSRD.

Jointly with the consultation on VSME ED to the consultation on this voluntary standard for non-listed SMEs, EFRAG is also consulting on the content of ESRS for listed SMEs (ESRS LSME ED). While ESRS cannot result in large undertakings having to request disclosures that are not included in ESRS LSME ED (which sets the value chain cap from a legal perspective), the VSME ED is intended to play a key role in supporting SMEs, when they prepare the information needed by large undertakings for ESRS reporting, as well as for other obligations including for business purposes. Therefore, VSME ED includes simplified disclosures that generally correspond to the reasonable expectations of ESRS Set 1 preparers (i.e. large undertakings that prepare their sustainability statement under ESRS). As a consequence, non-listed SMEs that apply VSME ED will in general be able to meet the data requests defined for value chain in ESRS LSME ED, except for very specific cases. These cases correspond to disclosures which are included in ESRS LSME ED (therefore SMEs may receive data requests from large undertakings relating to these disclosures, either due to their ESRS reporting obligations or for other obligations and business purposes), but are not included in the VSME ED, due to their excessive complexity for non-listed SMEs in general. They are principally of a sectorial nature (GHG Removals, substances of concern/high concern, resource inflows), mainly needed for management or specific arrangement purposes. More information is provided on these disclosures in [Annex 3](#).

Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.

32. Do you agree with the approach EFRAG has taken on the Value Chain Cap?

Yes

33. Please explain your answer, in brief:

The approach undertaken by EFRAG allows this type of companies to provide information on their sustainability performance, without over-complicating it.

34. Please provide other comments on the value chain cap, if any.

13. Thank You!

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