

# Corporate Sustainability Reporting Directive (CSRD)

Werken aan een veerkrachtig bedrijf

28-02-2024

# Welkomstwoord

Roy Tummers & Jan Appelman

28-02-2024

# Agenda

- 13:00 – 13:15 Welkomstwoord
- 13:15 – 14:00 Wat betekent CSRD voor u? – Mirjam van der Velde, HaskoningDHV
- 14:00 – 14:45 CSRD meets Waterwet – Jeppe Rietveld, HaskoningDHV
- 14:45 – 15:00 Pauze
- 15:00 – 15:45 Duurzaamheid, energie en efficiëntie – Weero Koster, Aeolian
- 15:45 – 16:30 CSRD vanuit accountantperspectief - Michiel Hondema, Mazars
- 16:30 – 17:00 Praktijkervaring FrieslandCampina – Barry Doesburg, Friesland Campina
- 17:00 – 17:15 Afsluiting
- 17:15 – 18:00 Borrel

# What is CSRD?

Mirjam van der Velde

28-02-2024

## Who am I?

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 06 5201 8586

Mirjam van der Velde ([LinkedIn](#))

Sustainability Lead Industrials  
22 years with RHDHV



# Corporate Sustainability

- is all about how your business is going to achieve a **balance** between environmental, societal and economic goals and remain profitable for years to come.

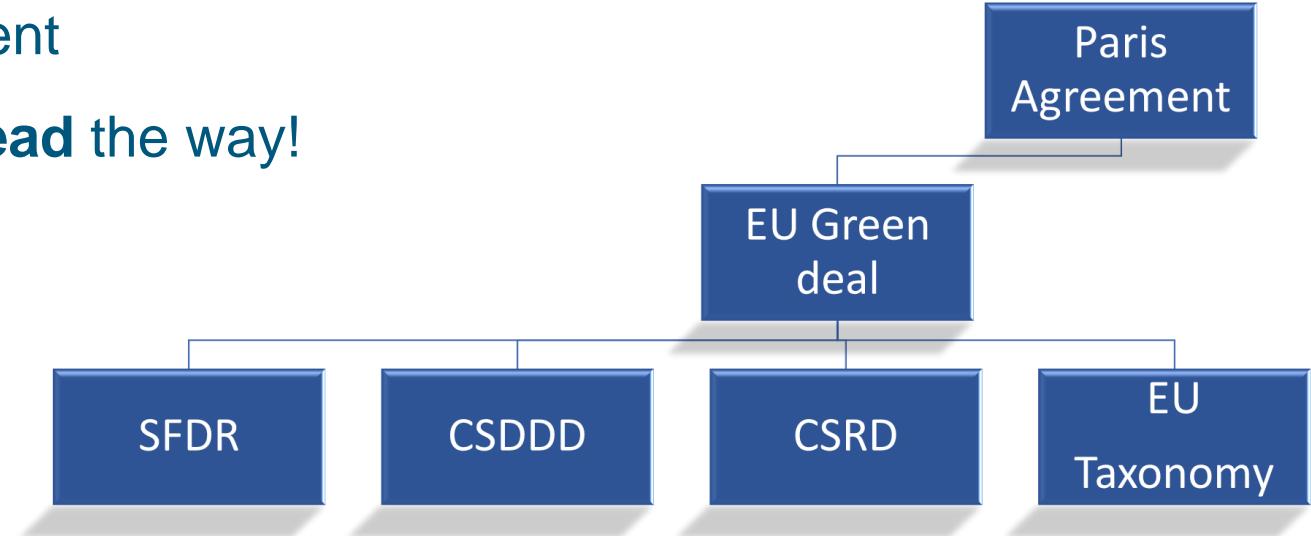


## Context

## European green deal



- Paris Agreement
- EU wants to **lead the way!**



- EU Green Deal: sustainable climate neutral economy by 2050
- EC has set policies to meet the Green Deal targets
- One of these is 'investing in a green future' aiming to make sustainable considerations an integral part of financial policy to support European green deal.

## Reasons for a new standard

With the CSRD the EU aims to:



- **Decrease systemic risks** in European Economy due to e.g. climate change
- Incentivize a change in capital flows towards **investments in sustainable activities and businesses**
- CSRD provides investors improved **insights** into opportunities and risks
- **Accountability** of companies with respect to their environmental and social impact
- Bring sustainability reporting **on par with financial reporting**
- CSRD provides a **standard**: the European Sustainability Reporting Standards (the so-called ESRS)

# Reporting landscape

What is CSRD?

Guiding principles embedded in these initiatives:

- For business sustainable operations: **Do No Significant Harm (DNSH) principle**
- For business sustainability reporting: **'double materiality' principle - report about how sustainability issues affect business and about your own impact on people and the environment**

Laws and regulations	Sustainability Reporting Standards	Sustainability frameworks
Corporate Sustainability Reporting Directive (CSRD) 	Taxonomy for sustainable activities 	 <i>Future: European Sustainability Reporting Standards (CSRD application) (ESRS)</i>
Besluit niet-financiële informatie (NFRD) 	Sustainable Finance Disclosure Regulation (SFDR) 	   
Harmonizing alliances	Sustainability Ratings & Rankings	

## Key Features of the European legal regime

# CSRD

Corporate Sustainability Reporting Directive



# Corporate Sustainability Reporting Directive

## Key Features



A key concept: **double materiality** (impacts and financial opportunities)



Reporting in the **value chain**



Location and timing of reporting: in the **management report**, i.e. at the same time as financial statements.



Phase-in Provisions in 1-3 years



Qualitative/quantitative information: Forward-looking and retrospective information; Short, medium and long-term time horizons



Mandatory Audit. limited assurance to start with, moving to reasonable assurance

# When will it affect you?

**Large listed companies** (> 500 employees) already subject to non-financial reporting directive, with reports due in 2025

**Large companies not presently subject to non-financial reporting directive** (> 250 employees and/or €50 million in turnover and/or €25 million in total assets\*), with reports due in 2026

**Listed SMEs** and other undertakings, with reports due in 2027

**Large non-EU companies** with substantial activity in EU market; €150 million+ in net turnover generated within EU in the last financial year.



**Summer 2023:**  
EU commission will adopt  
1<sup>st</sup> final ESRS's.

\* two out of three criteria



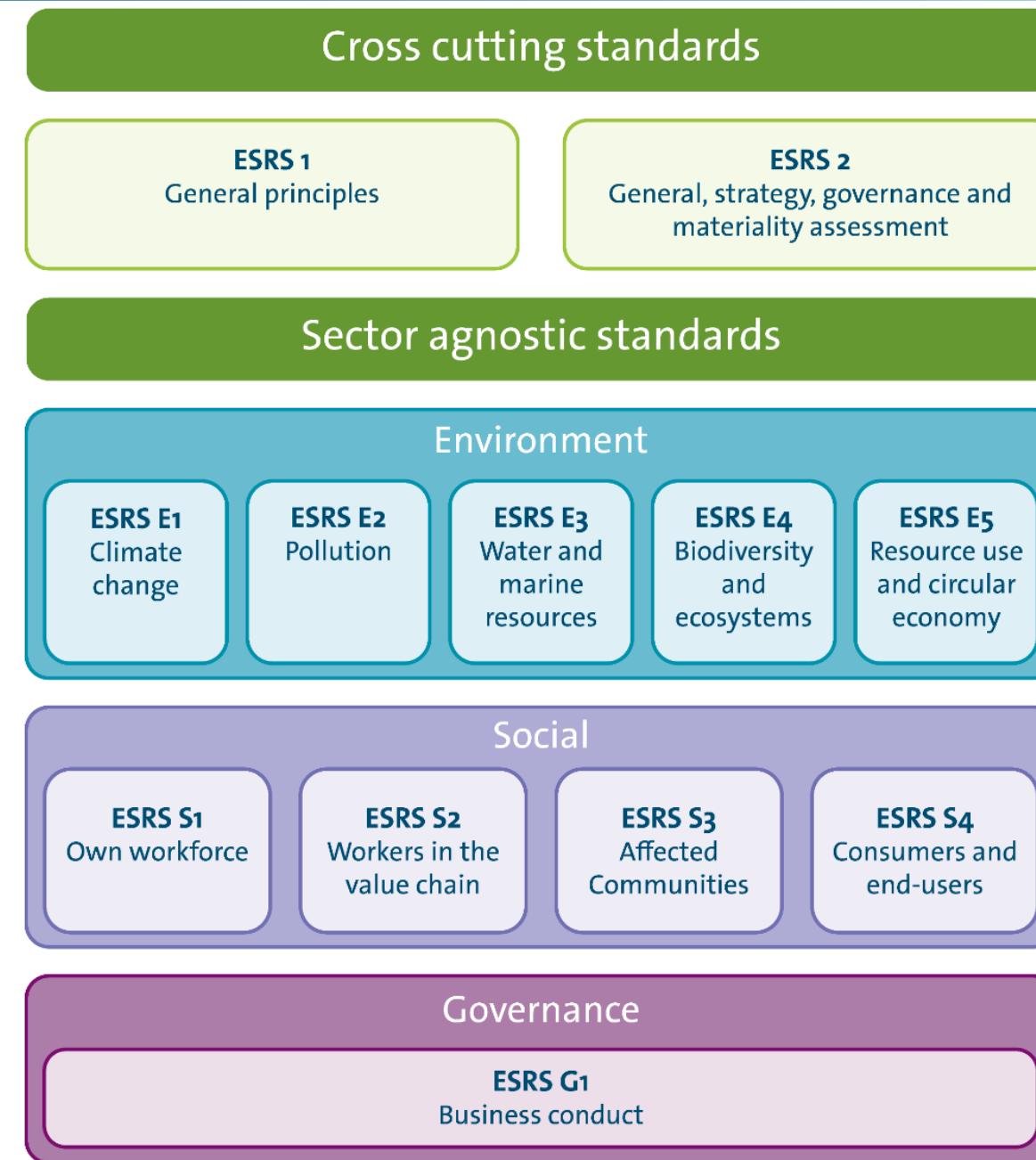
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## Key Features of the European legal regime

# ESRS

European Sustainability Reporting Standards





**82 Disclosure Requirements**  
Qualitative and Quantitative

**1053 datapoints**  
(narrative sub-element of a Disclosure Requirement)

**Implementation guidances**

*To be complemented by sector specific standards + SME standards*

# European Sustainability Reporting Standards (ESRS)

Subtopics (ESRS 1)

ESRS	Topic	Sub-(sub-) topics
E1	Climate change	Climate change adaptation Climate change mitigation
E2	Pollution	Air / water / soil Living organisms
	Etcetera	Substances of (very high concern) Microplastics
E3	Water and Marine Resources	Water (consumption, withdrawals, discharges) Marine resources
E4	Biodiversity and Ecosystems	Biodiversity loss State of species Condition of ecosystems

ESRS

## General structure of an ESRS



**Governance (GOV)** : processes, controls, procedures to monitor and manage IRO



**Strategy (SBM)**: interaction strategies and business models with IRO's



**Impacts, Risks & Opportunities (IRO)**: identification, assessment and management of IRO's



**Metrics & Targets (MT)** to measure performance

## Key Features of the European legal regime

# How to start?

European Sustainability Reporting Standards

## 7 steps to implementation

How to start?

### Our 7 step-method to get you ready for the new CSRD

steps



How to start ?

Don't wait  
too long!

	Mrt	April	May	June	July	Aug	Sep	Oct	Nov	Dec		
	Preparation		Corporate framework				Summer				Training and implementation	
<b>0. Scope definition / threshold analysis</b>												
<b>1a. Value Chain Assessment</b>												
<b>1b. Stakeholder Mapping</b>												
<b>2. Double Materiality Assessment</b>												
<b>3. Gap assessment</b>												
<b>4. Sustainable Corporate Strategy</b>												
<b>5. Data Collection</b>												
<b>6. Reporting Structure</b>												
<b>7. Reporting</b>												

How to comply

## Value Chain

ESRS Definition **Value Chain**: “*The full range of activities, resources and relationships related to the undertaking’s business model and the external environment in which it operates.*”

Risk based approach helps manage scale and complexity: identify general areas where impacts, risks and opportunities are most significant.



## Stakeholders

ESRS Definition: “**Stakeholders** are those who can effect or be affected by the undertaking.”

- Affected stakeholders in value chain: individuals or groups whose interests are affected or could be affected
  - Users of sustainability statements such as investors, lenders, business partners, trade unions, social partners, non-governmental organizations, governments



How to comply

## Double materiality matrix

A sustainability matter is material if it is material from the impact perspective or from the financial perspective or from both of these perspectives

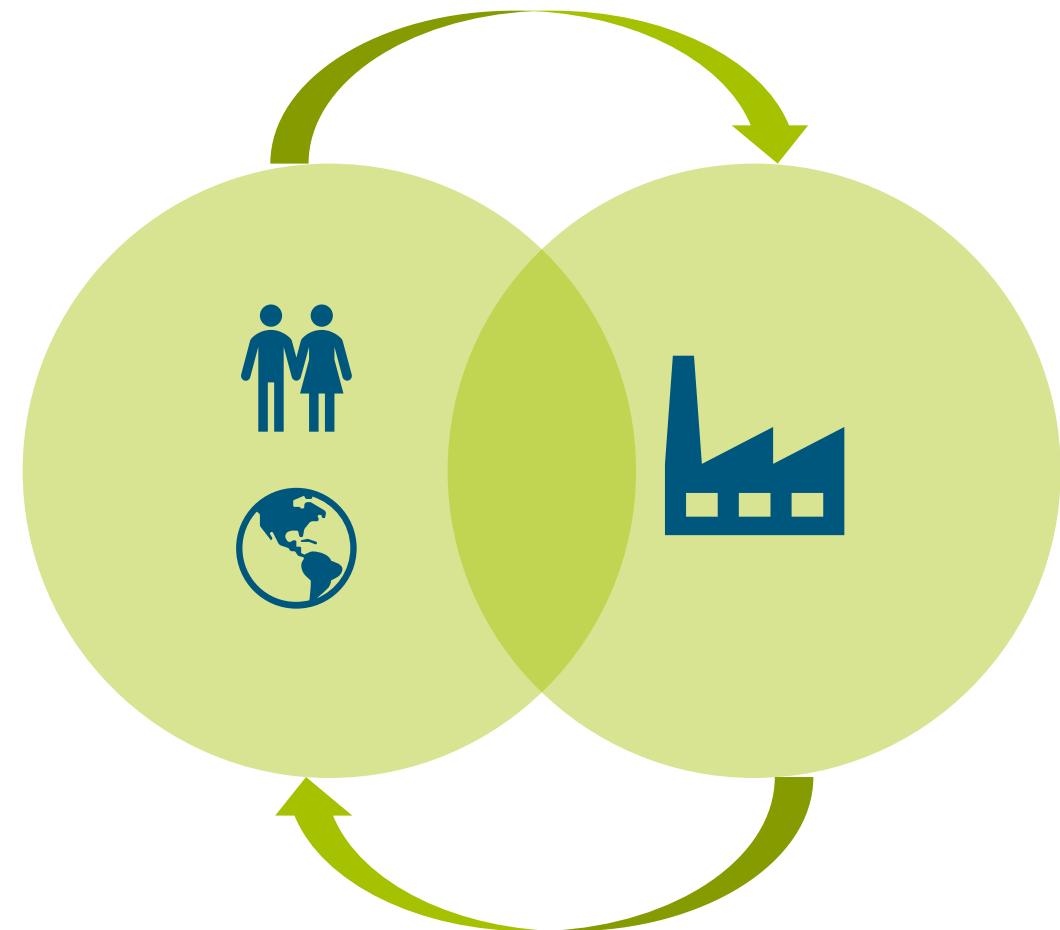
### Financial materiality:

Captures the outside-in impact of a business, considering the positive and negative impact of environment and society on your business.

### Impact materiality:

Captures the inside-out impact of your business, considering both positive and negative impacts on people, planet and society over the long, medium and short term.

### Outside-in: financial materiality

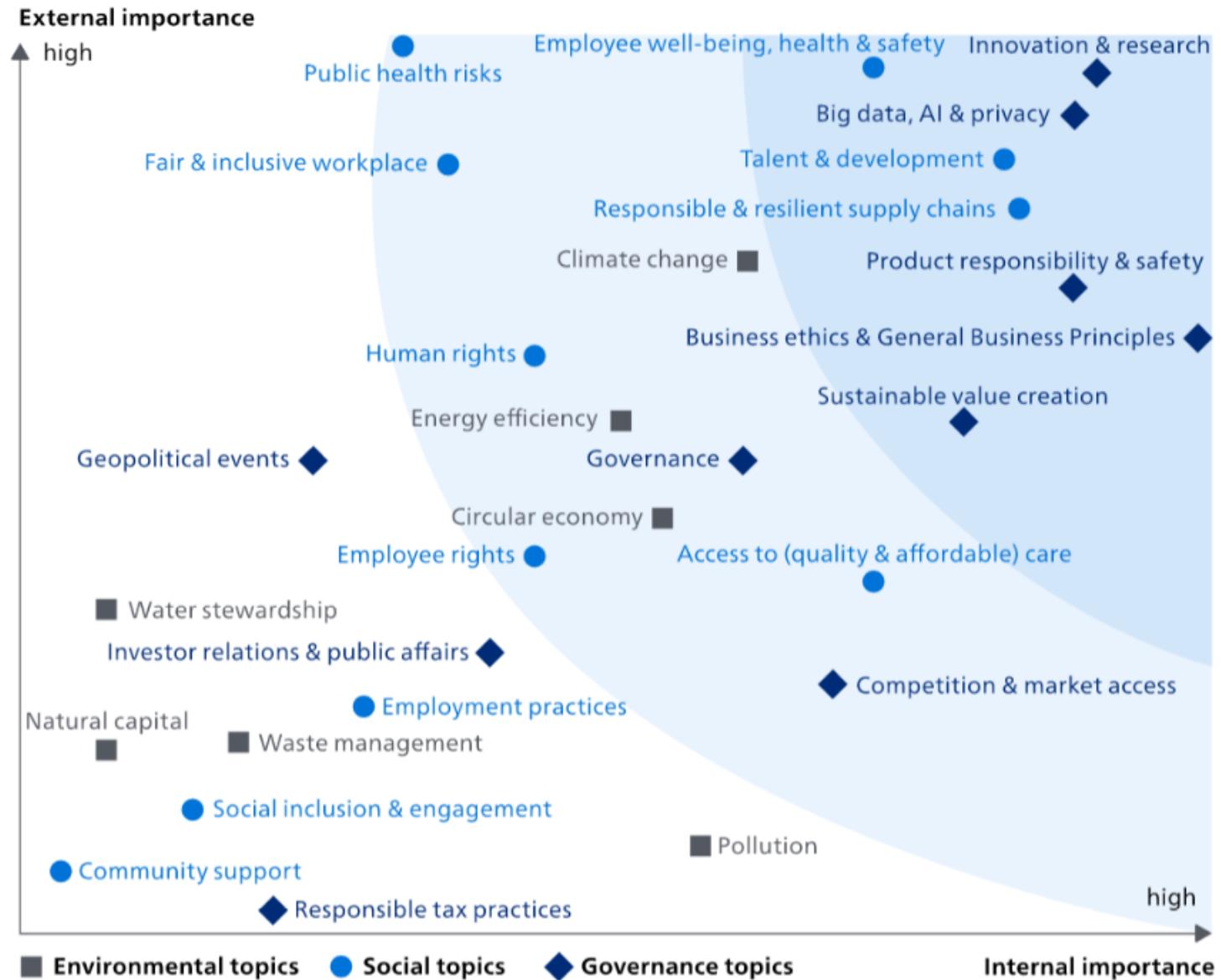


### Inside-out: impact materiality

How to comply

## Example of a Double materiality matrix

Source: Philips, Annual Report 2022



How to comply

## Next steps

Source: Presentation at  
Nationale Sustainability  
Congres, 23 November 2023  
by Simon Braaksma, Philips

## Double Materiality Assessment



## Next step: Gap Assessment

- “Text” Gaps associated with external communication. These can be addressed through new/revised:
  - Policies, targets, actions plans, methodologies
  - Changes to the annual report, including potential appendices
- “Metrics” Gaps associated with missing data, including targets
  - Is data missing or needed?
  - Source systems
  - Baseline setting

How to comply?

## Data points

- Datapoints for each ESRS (sub) topic
- It includes **voluntary and mandatory data points**
- **The data type** for each data point e.g. monetary, narrative, percent, volume, table

ESRS	DR	Paragraph	Related A	Name	Data Type
E1	E1.GOV-3	13		Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies	narrative
E1	E1.GOV-3	13		Percentage of remuneration recognised that is linked to climate related considerations	percent
E1	E1.GOV-3	13		Explanation of climate-related considerations that are factored into remuneration of members of administrative, management and supervisory bodies	narrative
E1	E1-1	14	AR 1	Disclosure of transition plan for climate change mitigation	narrative
E1	E1-1	16a	AR 2	Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement	narrative
E1	E1-1	16b		Disclosure of decarbonisation levers and key action	narrative
E1	E1-1	16c		Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan	narrative
E1	E1-1	16c		Financial resources allocated to action plan (OpEx)	monetary

## How does it impact you?

- Reporting might be **mandatory** for your company: check the thresholds!
- Otherwise, it is a reason to start thinking about your own impact; your partners might ask for this as well!
- **You might have a role** in data management, measuring and reporting
- CSRD will **increase awareness** with your clients on sustainability
- On the longer term: CSRD will increase investments in sustainable technology (on water, energy etc) **as businesses need to implement actions**

# CSRD meets Waterwet

Jeppe Rietveld

28-02-2024

# Agenda

1. Introductie
2. Het belang van waterbeleid
3. EU waterbeleid: een ontwikkelend kader
4. Wisselwerking waterbeleid
5. ESRS E3: Water en mariene hulpbronnen
6. ESRS E2: Verontreiniging
7. Toekomstige ontwikkelingen
8. Q&A

# Over deze presentatie

- **Waar we op ingaan**
  - Huidig waterbeleid EU
  - Wisselwerking waterbeleid en CSRD
  - De wateraspecten van de CSRD
  - ESRS E2: verontreiniging i.r.t. water
  - ESRS E3: water en mariene hulpbronnen
- **Wat we niet zullen bespreken**
  - Een overzicht van de gehele CSRD
  - Materialiteitsbeoordeling
  - Concrete invulling van eisen

# Industrial Water Compliance

- Team Water for Industry
- Watertechnologie, waterstrategie en watercompliance
- Vergunningtrajecten, ZZS-studies,  
waterbesparingsstudies



*Jeppe Rietveld*

*Adviseur Industrieel water*

*Gevaarlijke stoffen (PFAS)*

*Waterwetvergunningen*

# Het belang van waterbeleid

- Water van essentieel maatschappelijk belang en een basisbehoefte
- Waterwetgeving is belangrijk voor het welzijn van burgers en het behoud van natuurlijke ecosystemen
- Water is zeer waardevol in de economie van de EU
- Goede kwaliteit, voldoende omvang
- Goede ecologische en chemische status (KRW)
- SDG's: Water, consumptie en oceanen



# EU Waterbeleid: een ontwikkelend kader

Naast de KRW: andere beleidsstukken en wetgeving omtrent water

Richtlijn stedelijk afvalwater – groen licht herziening

Vervuiler betaalt principe (EPR) – controle geschiktheid

Richtlijn industriële emissies (RIE) – wordt herzien

Herziening drinkwater richtlijn- start 2026

Voor het eerst dat een EPR-plan wordt voorgesteld door de EU op gebied van waterwetgeving, waarbij producent dient te betalen voor verwijderen van microverontreinigingen uit water

Gekoppeld aan CSRD en chemicaliënwetgeving

# EU Waterbeleid: een ontwikkelend kader

EPR-voornemen kan invloed hebben op uw rapporteerstijl!

## Richtlijn stedelijk afvalwater

Betekent praktisch gezien dat producenten:

- Jaarlijks kwantiteit en waterbezuurlijkheid rapporteren
- Daaraan gekoppelde financiële bijdrage

### *Uitzonderingen*

- Als minder dan twee ton product op de markt gebracht wordt
- Producten geen microverontreinigingen in water brengen

**Van toepassing op farmacie en cosmetica,  
Evaluatie EC of sectoren uitgebreid moet worden**

## Kaderrichtlijn Water, Grondwaterrichtlijn en Richtlijn milieukwaliteitsnormen

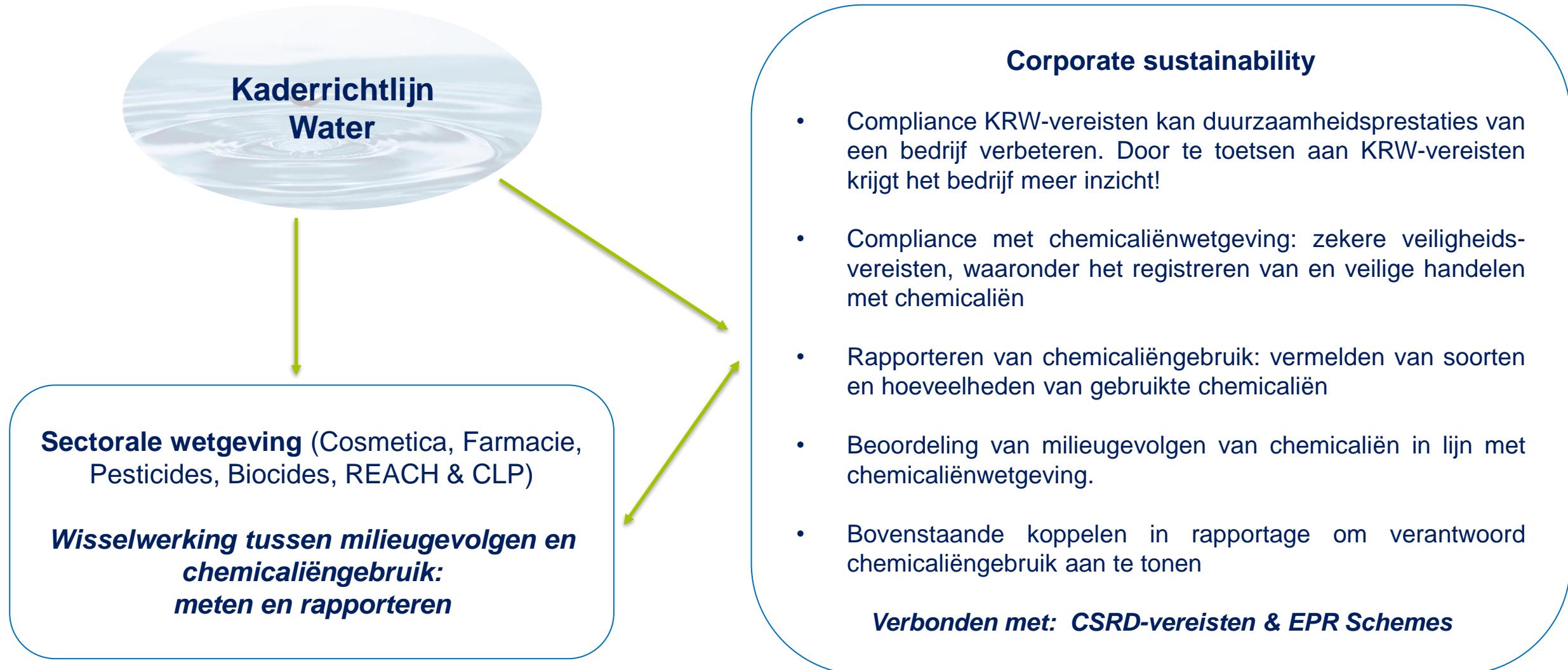
Het EP ENVI comité heeft ingestemd met het presenteren door de EC van een **impact assessment en wetgevingsvoorstel** voor de introductie van EPR

*EPR-verdrag heeft als doel dat producenten bijdragen aan kosten voor monitoringsprogramma's van stoffen die op de KRW prioritaire stoffen of opkomende stoffen lijsten staan*

**Kan van toepassing zijn op scala aan sectoren. Van pesticiden tot biociden, geneesmiddelen voor dieren, maar ook voor mensen**

# Wisselwerking tussen wettelijke kaders

Waterbeleid, chemicaliënwetgeving & corporate sustainability



# ESRS E3 – Water en mariene hulpbronnen

## *Doelen van inzichtelijkheid*

Begrijpen

- Impact op water en mariene hulpbronnen

Definiëren

- Maatregelen om waterbronnen te beschermen (bv inname verminderen)

Definiëren

- Bijdrage aan EU Green Deal (op gebied van water en blauwe economie)

Beschrijven

- Aanpassingsplannen en ruimte voor aanpassing (gerelateerd aan water en mariene hulpbronnen)

Begrijpen

- Materiële risico's en kansen voor water en mariene hulpbronnen (en hoe deze beheerst worden)

Kwantificeren

- Financiële gevolgen van die risico's op de korte, middellange en lange termijn

# ESRS E3 – Waar moet over gerapporteerd worden?



Proces om risico's op te sporen en te beoordelen



Beleid om impact, risico's en kansen te beheersen



Maatregelen met betrekking tot water en mariene hulpbronnen



Doelen met betrekking tot water en mariene hulpbronnen



Prestaties op het gebied van watergebruik



Verwachte financiële gevolgen door risico's en kansen

## E3-1: Beleid t.a.v. water en mariene hulpbronnen

Q: Heeft u al beleid opgenomen voor vermindering van waterverbruik in gebieden met waterrisico's? Ook voor uw up- /downstream?

Hoe het beleid zich verhoudt tot:

- **Waterbeheer:** winning, gebruik van water en mariene hulpbronnen
- **Waterbehandeling** en voorkomen en bestrijden van waterverontreiniging
- Producten/diensten als antwoord op **waterproblemen** en **behoud** mariene hulpbronnen
- **Vermindering** van waterverbruik in **gebieden met waterrisico's**
- Of er beleid is aangenomen ten aanzien van **duurzame oceanen en zeeën**



# E3-1: Beleid t.a.v. water en mariene hulpbronnen



Beleid: geen water onttrekken in tijden van  
waterschaarste (ook up-/downstream)

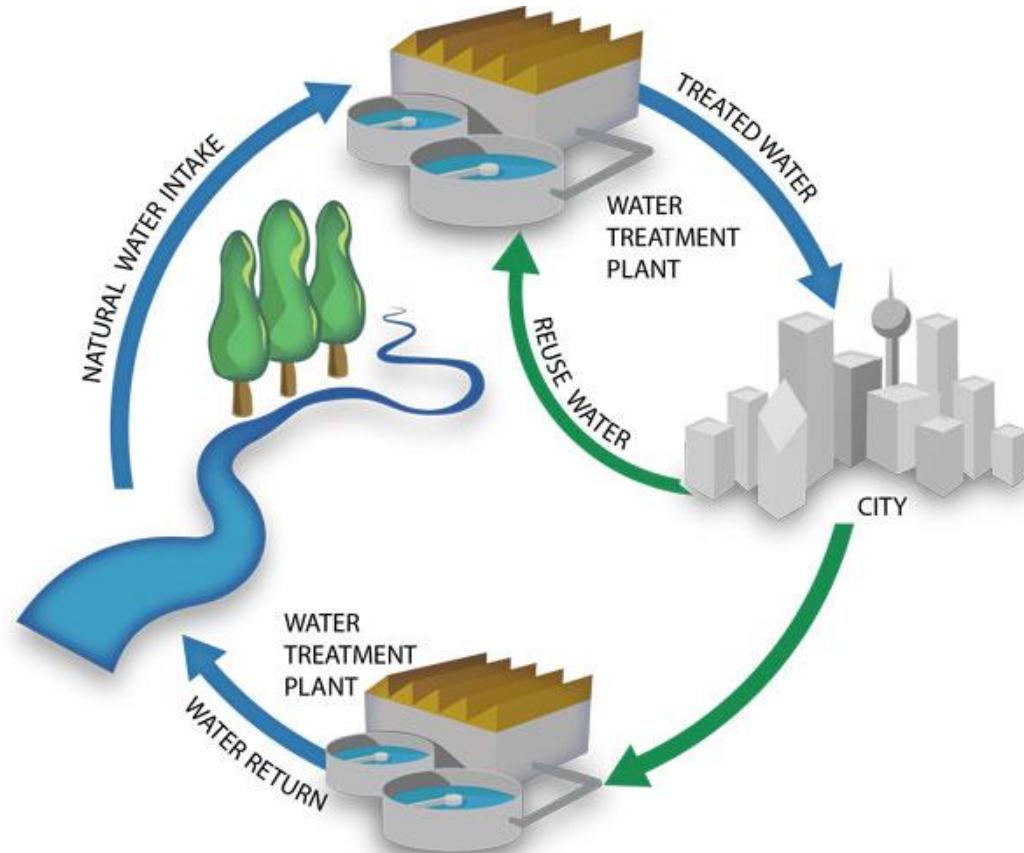
## E3-2: Maatregelen en middelen wat betreft water en mariene hulpbronnen

Welke maatregelen worden genomen om:

- Watergebruik en het gebruik van mariene hulpbronnen te **vermijden**
- Watergebruik en het gebruik van mariene hulpbronnen te **verminderen**
- Water terug te winnen of **hergebruiken**
- Aquatische ecosystemen te **herstellen**
- Gebieden met waterrisico's **minder te belasten**



## E3-2: Maatregelen en middelen wat betreft water en mariene hulpbronnen



Maatregel: afvalwater gaan hergebruiken

## E3-3: Doelen wat betreft water en mariene hulpbronnen

Q: Heeft u concrete doelen gesteld om water en mariene hulpbronnen minder te belasten?

Hoe verhouden de doelen zich tegenover:

- **Beheersing** in gebieden met waterrisico
- Verbeteren van de **waterkwaliteit**
- **Verantwoord gebruik** van mariene hulpbronnen
- Verminderen van **waterverbruik**
- **Ecologische drempels**

Zijn de vermelde doelen verplicht (bv. wettelijk) of vrijwillig gesteld?



## E3-3: Doelen wat betreft water en mariene hulpbronnen



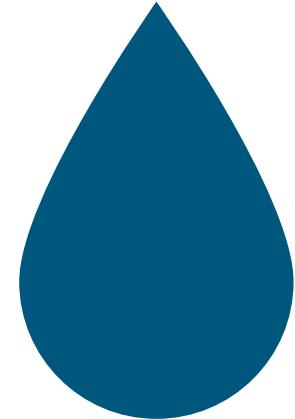
Doel: 90% vermindering van de jaarvracht van lood naar het oppervlaktewater

## E3-4: Waterverbruik

Q: Is het totale waterverbruik in kaart gebracht? Heeft u ook de zogenaamde waterintensiteit bepaald?

Rapporteren door beschrijven van:

- Het **totale waterverbruik** van de onderneming
- Het totale waterverbruik in **gebieden met waterrisico's**
- De totale hoeveelheid gerecycled en **hergebruikt** water
- De totale hoeveelheid **opgeslagen** watervoorraad
- **Waterintensiteit:** totale waterverbruik tegen over netto-omzet: m<sup>3</sup>/ €1.000.000



## E3-4: Waterverbruik



3.000.000 m<sup>3</sup>

Rapporteren: waterintensiteit en totaal volume  
hergebruikt (en bespaard) water

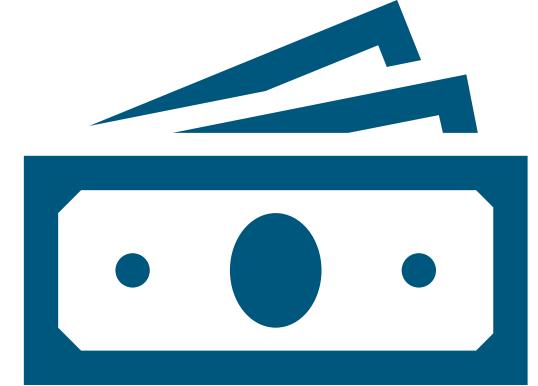
## E3-5: Financiële gevolgen wat betreft water en mariene hulpbronnen

Rapporteren door beschrijven van:

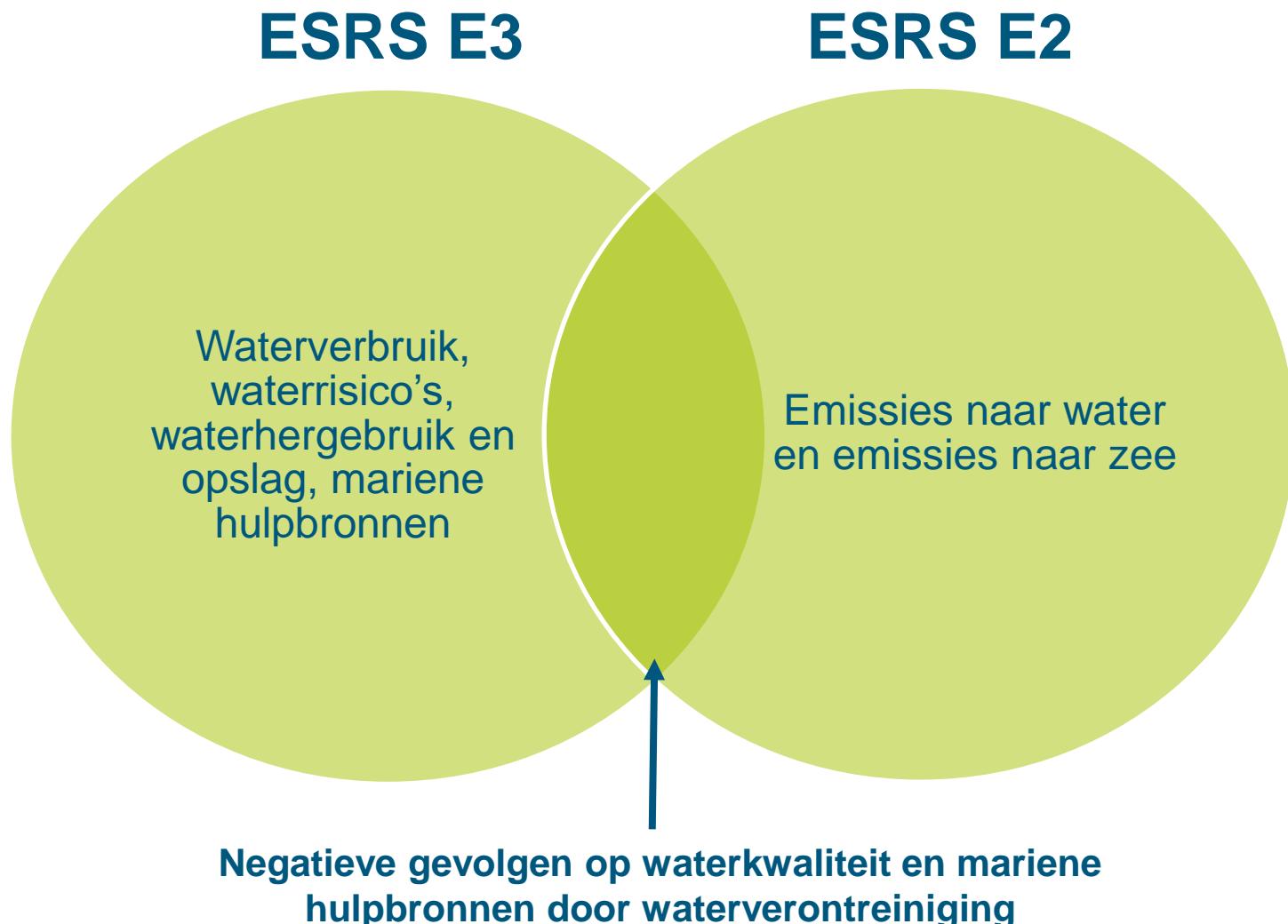
- Beoogde financiële effecten van maatregelen
- Beschrijven van de beschouwde effecten en tijdsbestek

waarin deze op zullen treden

- **Kritieke aannames** die bij deze kwantificatie zijn gebruikt,  
alsmede de bronnen en onzekerheid daarvan



# ESRS E2: – Overlap met ESRS E3



# ESRS E2 – Verontreiniging

## *Doelen van inzichtelijkheid*

### Begrijpen

- Hoe de bedrijfsvoering gevolgen heeft op verontreiniging van bodem, water en lucht

### Definiëren

- Maatregelen om negatieve gevolgen van verontreiniging te voorkomen of verminderen

### Beschrijven

- Aanpassingsplannen en ruimte tot aanpassing (in relatie tot het maken van een gifvrij milieu en Green Deal Zero Pollution doelen)

### Begrijpen

- Materiële risico's en kansen omtrent verontreinigingen (en beheersing daarvan)

### Kwantificeren

- Financiële gevolgen van die risico's op de korte, middellange en lange termijn

# ESRS E2 – Waar moet over gerapporteerd worden?



Proces om risico's op te sporen en te beoordelen



Beleid om impact, risico's en kansen te beheersen



Maatregelen met betrekking tot verontreinigingen



Doelen met betrekking tot het voorkomen van verontreiniging



Verontreiniging van lucht, **water** en bodem



Productie, gebruik en distributie van (Z)ZS



Verwachte financiële gevolgen door risico's en kansen

## E2-1: Beleid ten aanzien van verontreiniging

Q: Heeft u beleid opgenomen voor het vervangen en beperken van gebruik van zeer zorgwekkende stoffen?

Hoe het beleid is t.a.v. de eigen processen, maar ook upstream en downstream, m.b.t.:

- Negatieve gevolgen door mitigatie van verontreiniging van water door voorkomen en bestrijden;
- Vervangen en beperken van gebruik van (zeer) zorgwekkende stoffen
- **Vermijden van (milieu)-incidenten en impact op mens en milieu beperken**



## E2-2: Maatregelen en middelen w.b. verontreiniging

Q: Neemt u maatregelen voor het herstellen van ecosystemen?

Welke stap in de mitigatieladder wordt genomen?

- Bronaanpak: uitfaseren materialen/verbindingen met negatieve impact op water
- Reduceren verontreiniging: toepassen van best beschikbare technieken (BBT)
- **Herstellen, regenereren en transformeren van het ecosysteem**



## E2-3: Doelen wat betreft verontreiniging

Q: Heeft u concrete doelen gesteld om emissie van verontreinigende stoffen naar water te verminderen? Is het stellen van deze doelen wettelijk verplicht?

Hoe verhouden de doelen zich tegenover:

- Het bestrijden en voorkomen van emissies naar water
- Het beheersen van (Z)ZS-emissie
- Vastgestelde ecologische drempels

**Zijn de vermelde doelen verplicht (bv. wettelijk) of vrijwillig gesteld?**

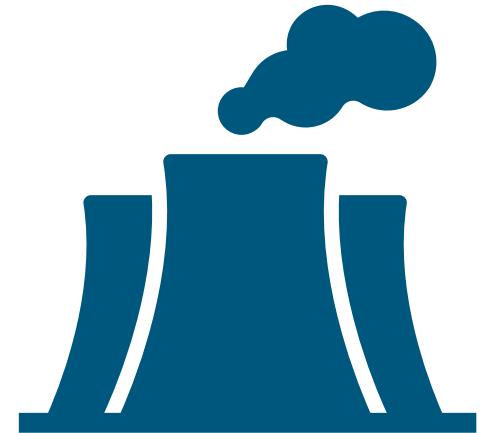


## E2-4: Verontreiniging lucht, water, bodem

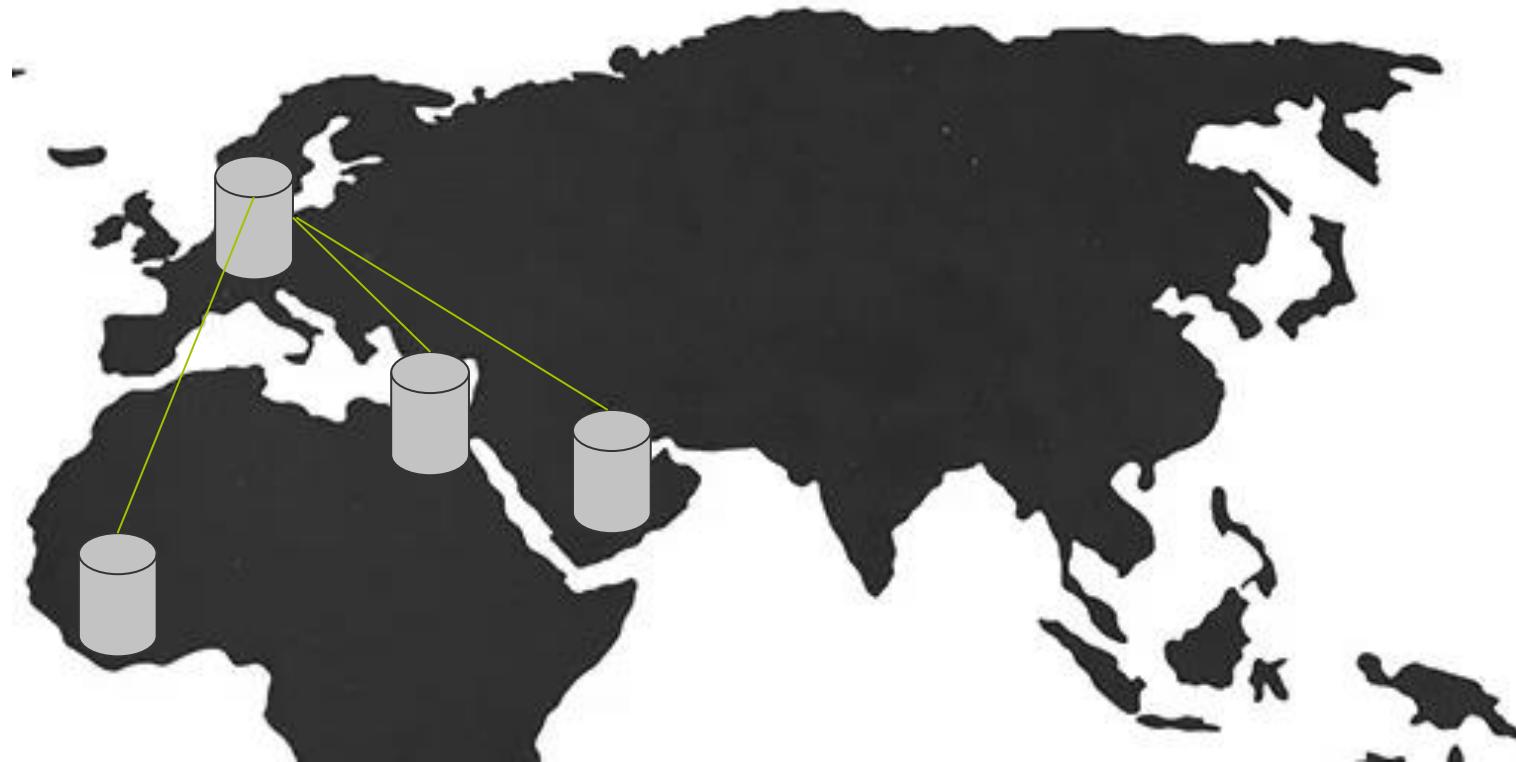
Q: Rapporteert u reeds emissies naar water? Rapporteert u ook de gebruikte meetmethodes?

Rapporteren door beschrijven van:

- Emissies naar water van stoffen aanwezig op Bijlage II EG nr. 166/2006 (E-PRTR)
- **Eveneens rapporteren over uitstoot van bedrijven waarover bedrijf financieel en/of operationeel zeggenschap heeft**
- Methodes voor dataverzameling en gehanteerde meetmethodes
- Wanneer inferieure kwantificatie-methoden gebruikt zijn, onderbouwen waarom dit het geval is



## E2-4: Verontreiniging lucht, water, bodem



Rapporteren wateremissies voor  
hoofondonderneming én dochterbedrijven

## E2-5: (Zeer) Zorgwekkende stoffen

Q: Heeft u in kaart gebracht hoeveel ZZS de onderneming binnenkomen? En ook hoeveel de onderneming verlaten?

Rapporteren door beschrijven van:

- Mengsels of voorwerpen waarin (Z)ZS aanwezig zijn
- Totale hoeveelheden (Z)ZS die ontstaan, ingekocht en/of gebruikt worden
- **Totale hoeveelheden (Z)ZS die de onderneming verlaten als emissie, product of dienst**
- Informatie over ZZS separaat van ZS presenteren



## E2-5: (Zeer) Zorgwekkende stoffen



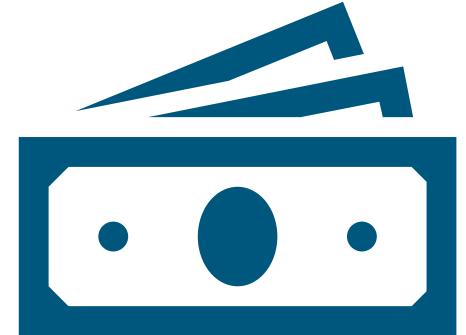
Rapporteren (Z)ZS in, (Z)ZS geproduceerd,  
(Z)ZS uit

## E2-6: Financiële gevolgen

Q: Heeft u financiële inzichtelijkheid van de netto-opbrengst door diensten en producten die ZZS bevatten?

Rapporteren door beschrijven van:

- **Aandeel netto-opbrengst door producten en diensten die (Z)ZZS bevatten**
- OPEX/CAPEX in samenhang met incidenten en sanering
- Getroffen voorziening voor milieubescherming en herstelkosten



# Toekomstige ontwikkelingen

## Water in het steeds veranderende beleid

- Water zal centraal staan in beleidsinitiatieven van EU in komende politieke cyclus
- Ontwikkeling van coherente, geharmoniseerde en alomvattende benadering van water zal belangrijk punt op agenda van Commissie zijn
- Dit zal vorm krijgen als een EU-breed kader voor waterveerkracht dat gericht is op waterduurzaamheid in verschillende sectoren, waaronder consumenten, landbouw en industrie
- Gezien het brede toepassingsgebied zal het EU-kader voor waterveerkracht waarschijnlijk ingrijpende sectoronafhankelijke gevolgen hebben voor bedrijven

*Ontwikkelen van waterstrategie en naleving van de ontwikkelingen binnen de kaderrichtlijnen zal de sleutel voor de industrie zijn!*

# Q & A

# Pauze

We gaan verder om  
15:00 uur

28-02-2024





# Duurzaamheid, energie en efficiëntie

Weero Koster

28-02-2024

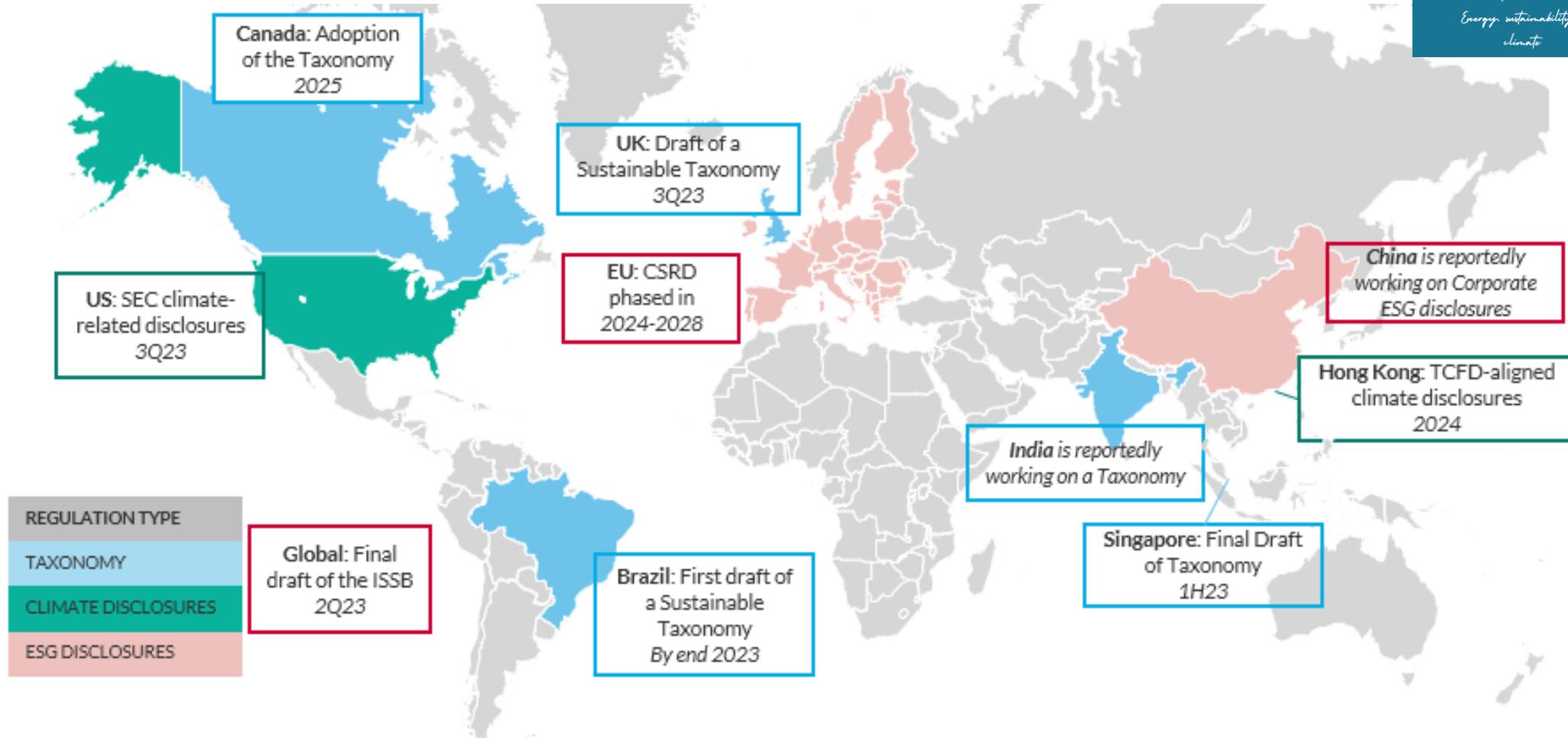


# Sustainability, Energy & Efficiency

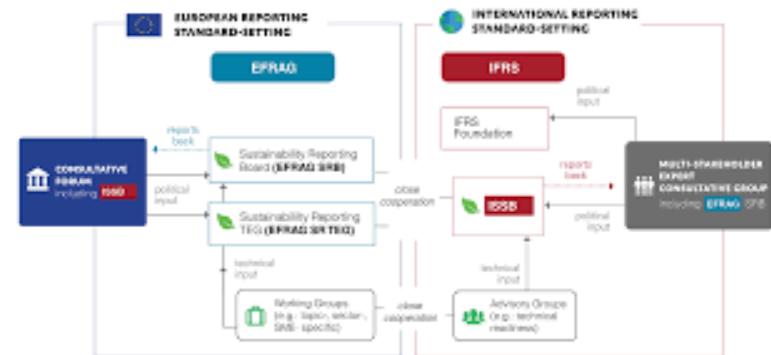
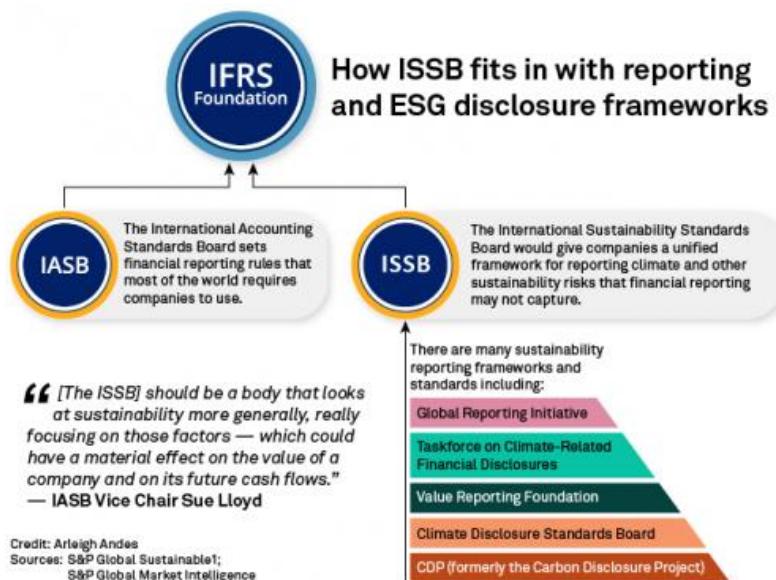
## Topics:

- EU green deal goals and the package
- Energy efficiency and circularity
- EU Taxonomy
- ESRS' E1 (E2 en E5)
- Practical examples

# Upcoming ESG regulations



# Alphabet soup

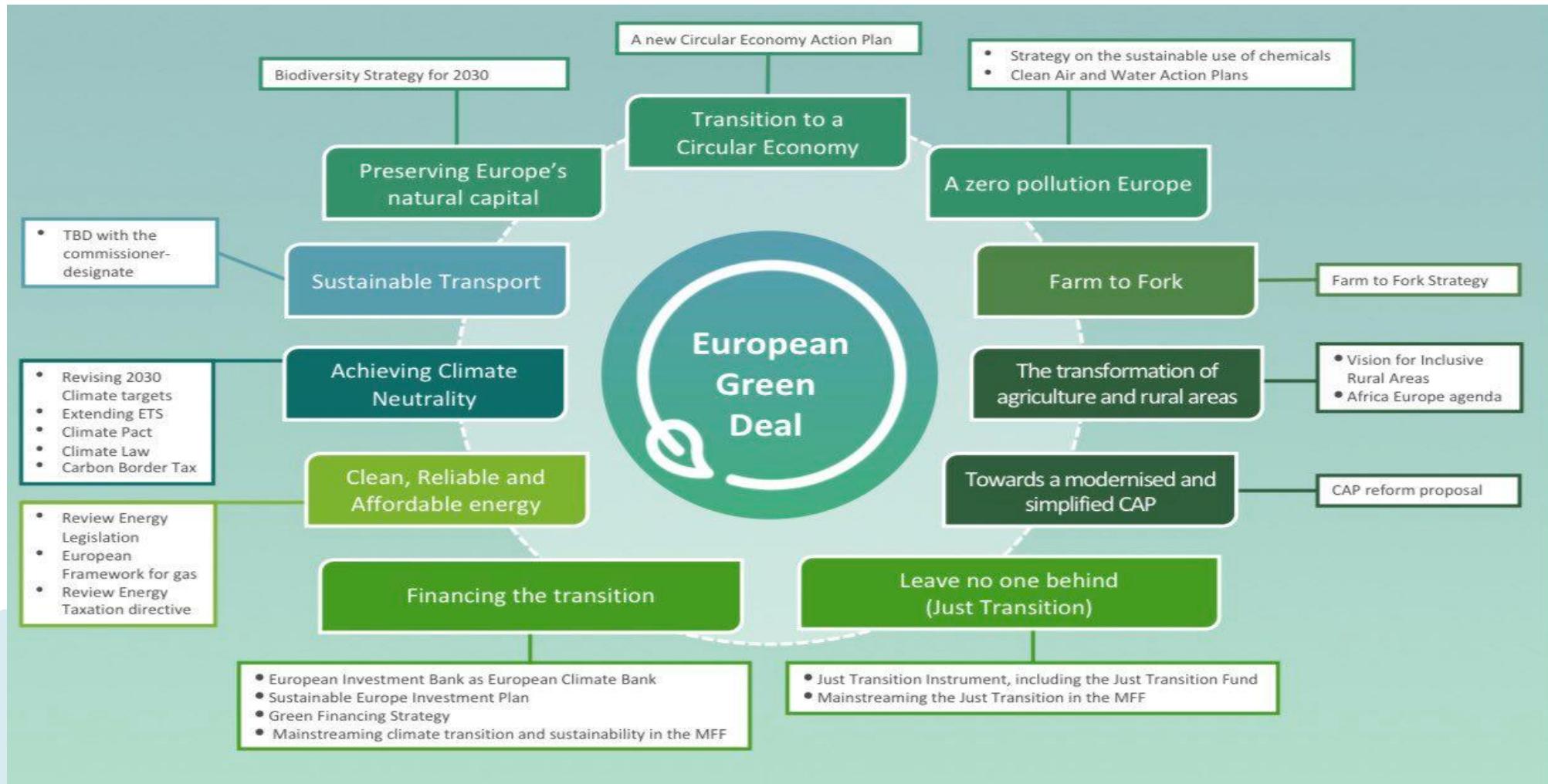


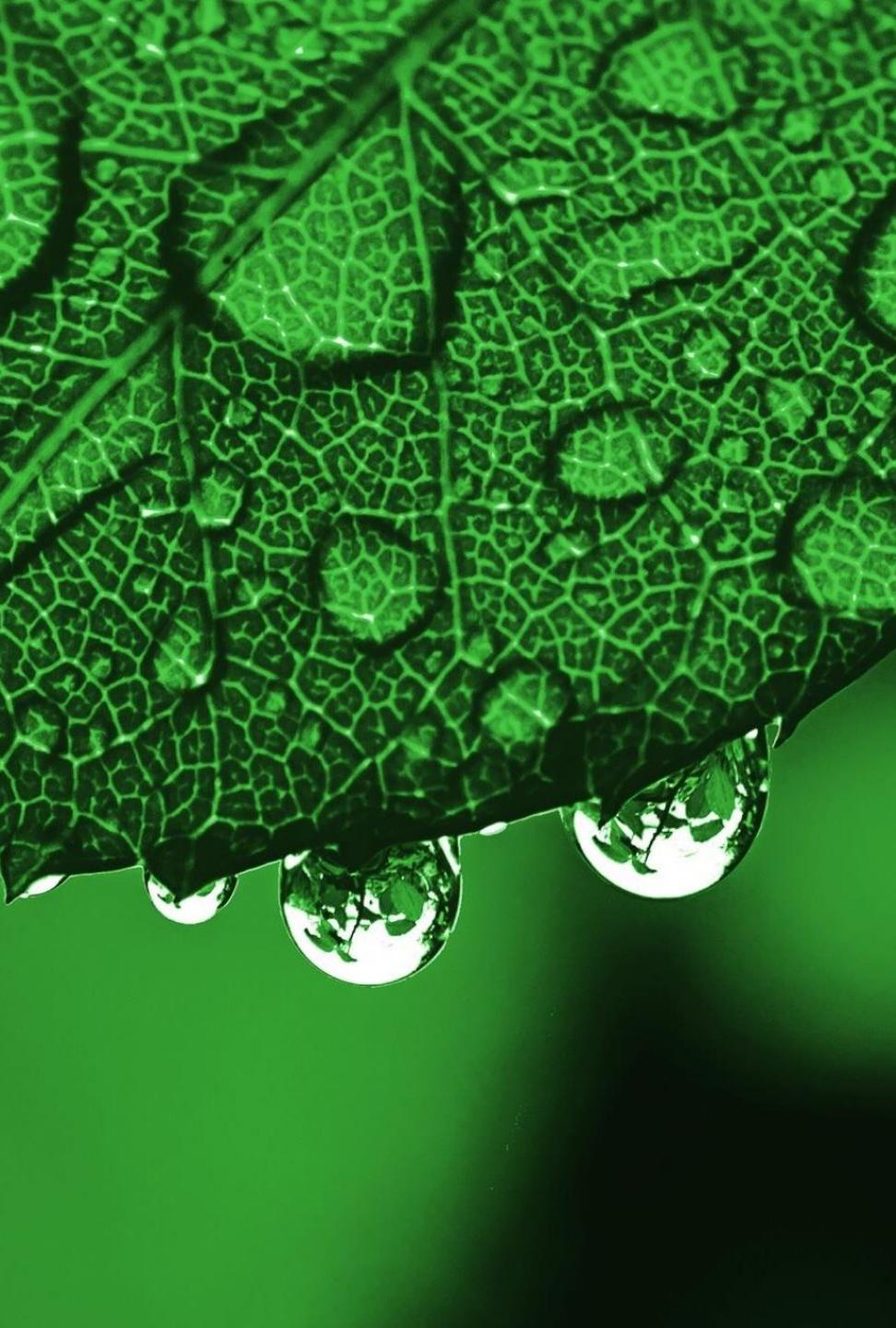


## Main goals EU Green Deal (“man on the moon moment”):

- To reorient capital flows by establishing :
  - a classification system (taxonomy) for sustainable activities, and
  - standards and labels for green bonds, benchmarks, and other financial products.
- To increase EU funding for sustainable projects.
- To mainstream sustainability into risk management.
- To foster transparency and long-term thinking by strengthening the disclosure requirements.







# Green deal initiatives

- CSRD
  - ESRS > “reporting” or “transformation”
- CSDDD
- EU-Taxonomy
- Energy Efficiency Directive
- Renewable Energy Directive(s)
- Others
  - Fit for '55 initiative
  - Biodiversity strategy
  - Circular Economy Action plan
  - Sustainable products initiative
  - Clean air & water action plan
  - Waste Framework Directive
  - EU Industrial Policy

# CSRD, CSDDD and EU taxonomy

## EU Taxonomy (2022)

- Classification business activities
- Helps investors direct funds
- Transparency on basis of turnover, Opex, Capex
- Climate change and adaptation, water & marine resources, circular economy, pollution, biodiversity & ecosystems
- social taxonomy by reference UNGPFR, OECD Guidelines, UNGC

## CSRD/ESRS (2024)

- Stakeholders, strategy & governance
- Own operations and value chain

## CSDDD (2025)

- Due diligence duty to “identify, prevent, bring to an end adverse human rights and environmental impacts”
- Own operations and value chain



Aesian.  
Energy, sustainability &  
climate

# EU taxonomy



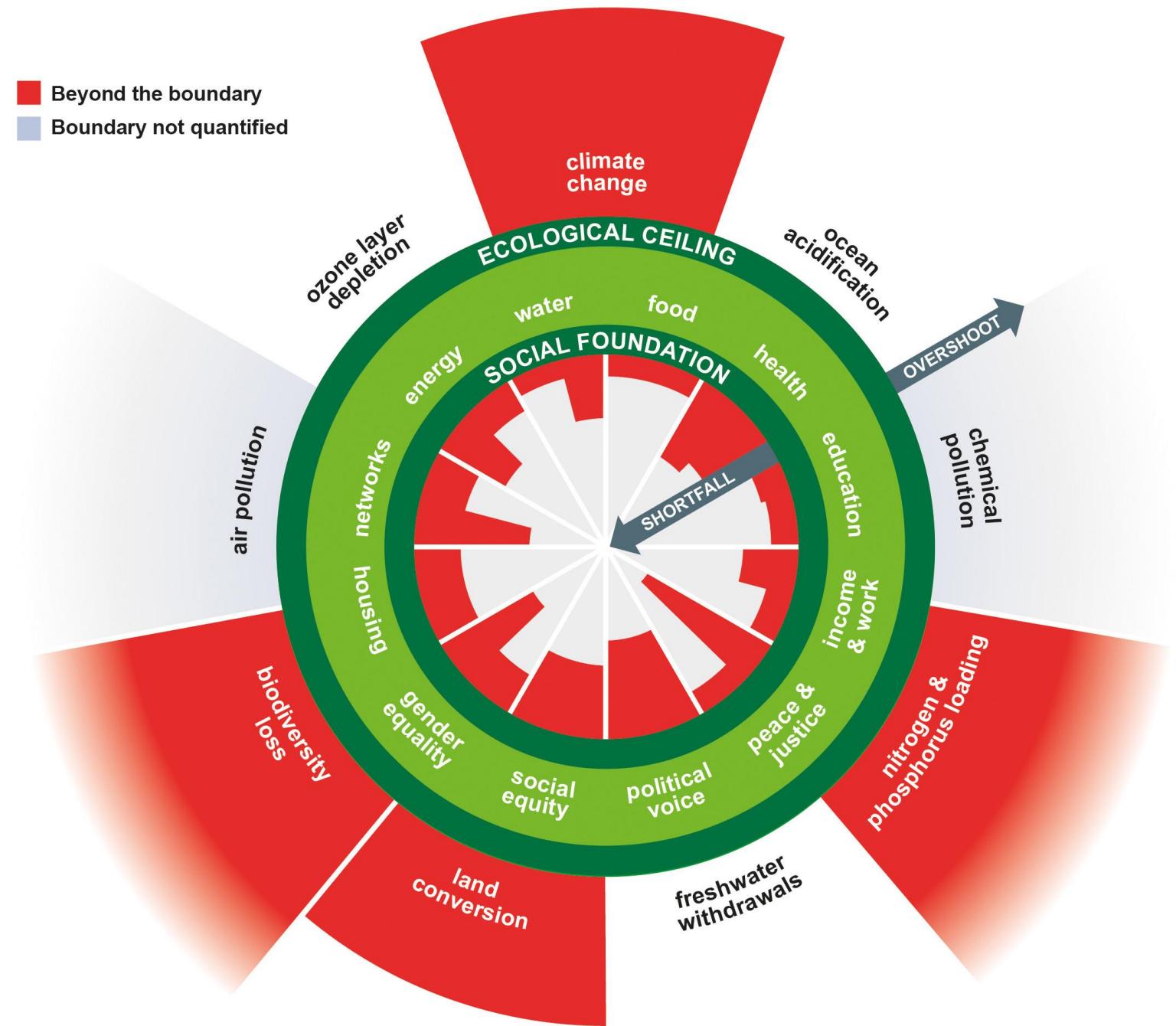
- Contributes substantially to one or more environmental objectives, and
- Does not significantly harm any environmental objective, and
- Is compliant with minimum safeguards (e.g. UN Convention HR, UNGP, OECD Guidelines), and
- Complies with the technical screening criteria.



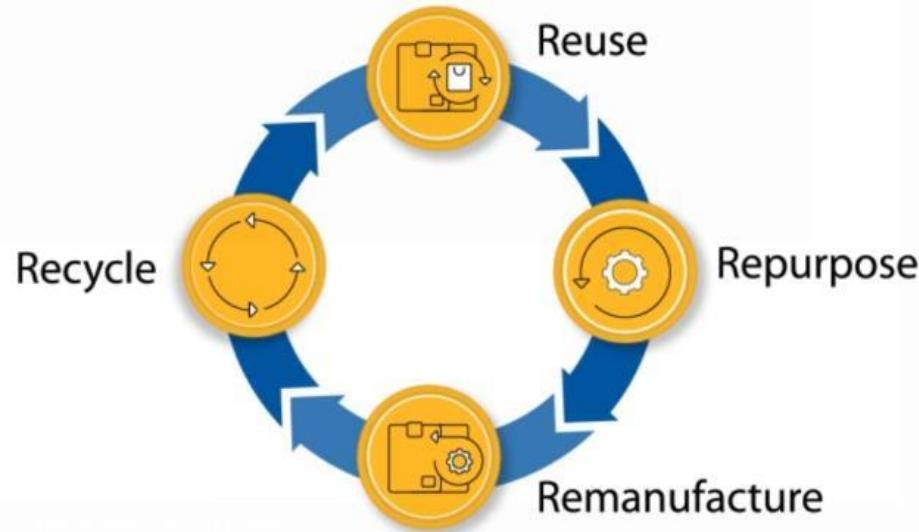
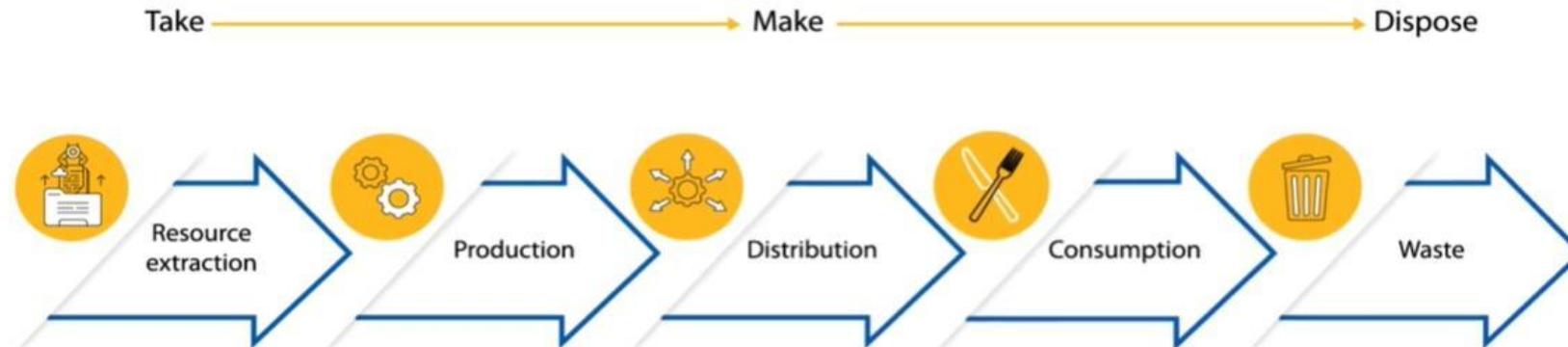
- Climate change mitigation and adaptation (2 C / 1,5 C)
- Water & marine resources protection
- Circular economy
- Biodiversity and ecosystem protection
- Pollution prevention and control



■ Beyond the boundary  
■ Boundary not quantified



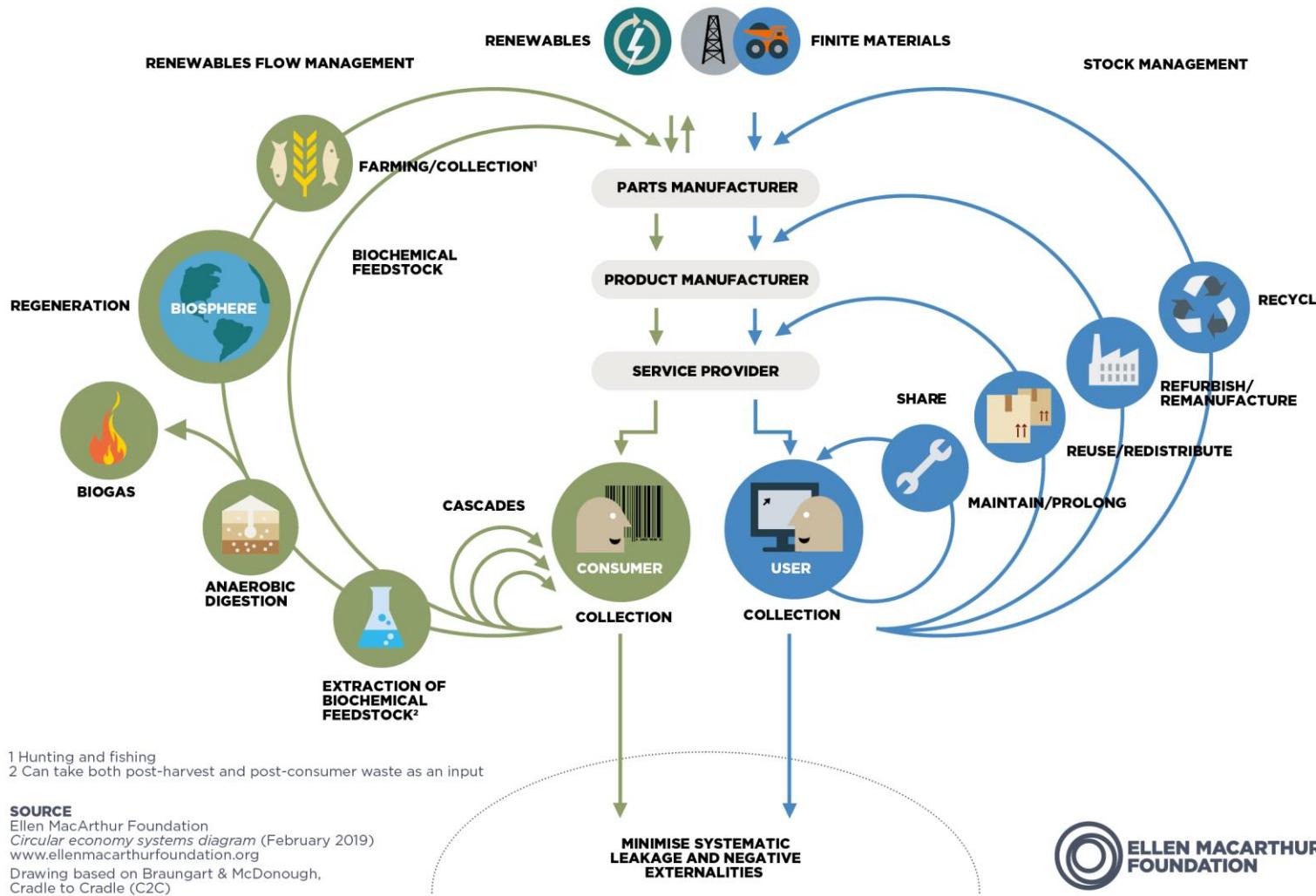
Planetary  
Boundaries/Doughnut  
economics Kate Raworth,  
based on Rockström et al.,  
2009, Steffen et al., 2015  
<https://www.youtube.com/watch?v=Rhcrbcg8HBw&t=63s>  
<https://doughnuteconomics.org/tools/191>



Source: BIOAZUL SL based on European Commission

[https://circularconomy.europa.eu/platform/sites/default/files/categorisation\\_system\\_for\\_the\\_ce.pdf](https://circularconomy.europa.eu/platform/sites/default/files/categorisation_system_for_the_ce.pdf)

# Circular Economy Ellen MacArthur



1 Hunting and fishing

2 Can take both post-harvest and post-consumer waste as an input

## SOURCE

Ellen MacArthur Foundation  
Circular economy systems diagram (February 2019)

www.ellenmacarthurfoundation.org  
Drawing based on Braungart & McDonough,  
Cradle to Cradle (C2C)



<https://www.storyofstuff.org/movies/story-of-stuff/>  
<https://youtu.be/6g0AYbEoOGk>



# Structure ESRS

## Cross-cutting requirements

- General requirements
- General disclosures

## Sector-agnostic (topical standards across E,S,G applying to all sectors)

- Environmental (climate change, pollution, water& marine resources, biodiversity & ecosystems, resource use & circular economy)
- Social (own workforce, workers in value chain, affected communities, consumers and end-users)
- Governance (business conduct, deleted: risk management & internal control)

## Sector specific (first draft stage and postponed)

- Coal mining, Mining, Oil & Gas mid to downstream, Oil & Gas upstream, Agriculture, Energy production, Food & Beverage, Motor vehicle production, Road transport, Textiles, Accessories, Footwear, Jewellery

# [Draft] List of ESRS Data Points - Implementation

05-03 EFRAG SRB Meeting 25 October 2023

Please find instructions, explanations and a disclaimer on the content of this Webpage

Standard (click to jump):

[ESRS 2 - General Disclosures](#)

[ESRS 2 - Minimum Disclosure Requirements \(MDR\)](#)

[E1 - Climate Change](#)

[E2 - Pollution](#)

[E3 - Water and Marine Resources](#)

[E4 - Biodiversity and Ecosystems](#)

[E5 - Resource Use and Circular Economy](#)

[S1 - Own Workforce](#)

[S2 - Workers in the Value Chain](#)

[S3 - Affected Communities](#)

[S4 - Consumers and End-users](#)

[G1 - Business Conduct](#)

# ESRS E 1 Climate Change

- Covers Disclosure Requirements related to the following sustainability matters: (...) and “Energy”.
- The requirements related to “Energy” cover all types of energy production and consumption.
- Performance of members of the administrative, management and supervisory bodies to be assessed against the GHG emission reduction targets.
- Enable an understanding of the undertaking’s past, current, and future mitigation efforts to ensure that its strategy and business model(s) are compatible with the transition to a sustainable economy.
- The undertaking shall indicate whether and how its policies address the following areas:
  - (...)
  - energy efficiency;
  - renewable energy deployment; and (...)



# ESRS E1-5 Energy Consumption & Mix

- Information on its own operations' energy consumption and mix:
  - total energy consumption from non-renewable sources for high climate impact sectors disaggregated by fuel; and
  - total energy consumption from renewable sources, by fuel consumption (including biomass, biogass, green hydrogen, waste, etc.), purchased and self-generated.
- Energy intensity based on net revenue (total energy consumption per net revenue) associated with activities in high climate impact sectors (definition as per SFDR: energy, mining, transport, construction, agriculture, water, F&B, etc.).



## ESRS E3 Pollution

- Policies, actions and resources, targets.
- Air water and soil (and inorganic or ozone-depleting pollutants and microplastics).
- Substances of concern and very high concern.
- Potential financial effects from pollution related impacts, risks and opportunities.
- Interaction with ESRS E1 (CC), E3 (water), E4 (biodiversity) and E5 (resource use and circular economy), possibly S3 (affected communities)



# ESRS E5 Resource use and circular economy

- Policies, actions and resources, targets related to resource use and circular economy.
- Resource inflows and resource outflows.
- Products and materials (in tonnes or percentages) designed along circular principles.
- Waste streams and materials, hazardous and non-hazardous, and possible reuse, recycling or other recovery operations.
- Potential financial effects from resource use and circular economy related impacts, risks and opportunities.
- Interaction with ESRS E1 (CC), E2 (pollution), E3 (water), E4 (biodiversity) and E5 (resource use and circular economy), possibly S3 (affected communities).
- Appendix B refers to ESRS 2 on impact, risk and opportunity management.



# Key shifts CSRD from NFRD

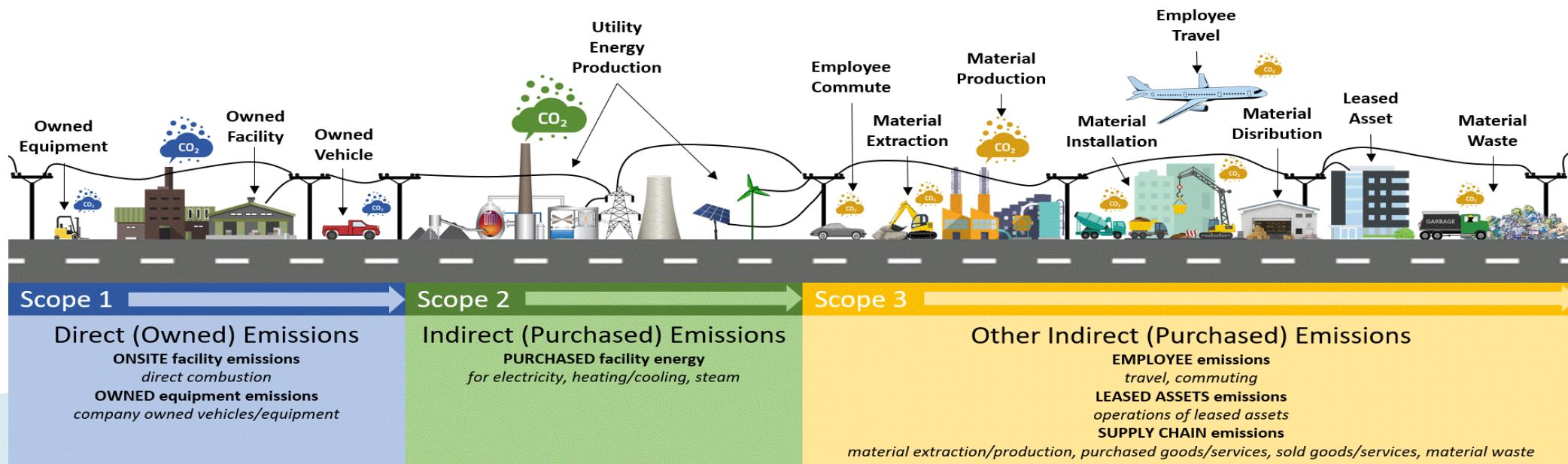
- Entire value chain considered:
  - ESRS compliant ESG reporting on ALL phases of the value chains: upstream, own operations, and downstream: *“the undertaking shall include material impacts, risks and opportunities connected with its upstream and downstream value chain(s)”*
- Link to governance, business model and strategy
- (limited) assurance
- Expansion of data capacity



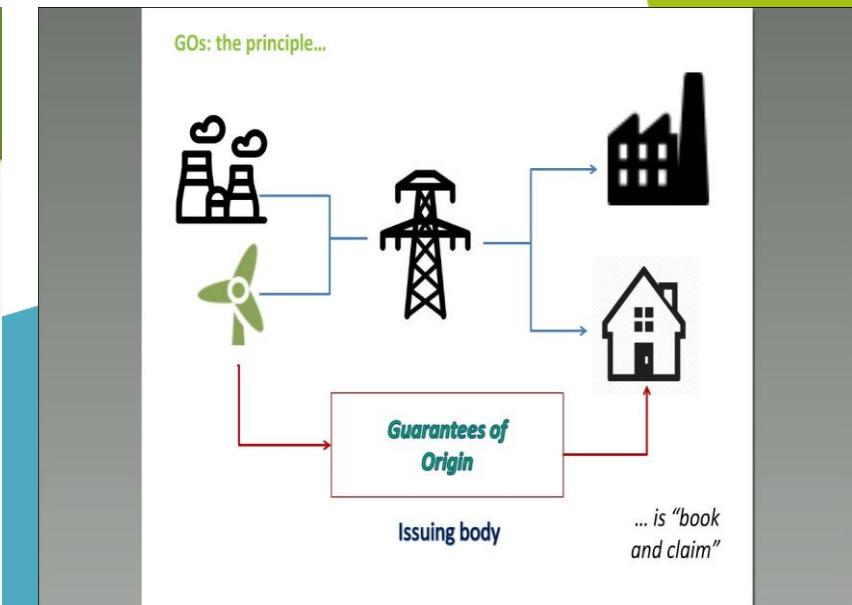


Graphic by Stacy Smedley, 2021

## Understanding Scope 1, 2 and 3 Emissions



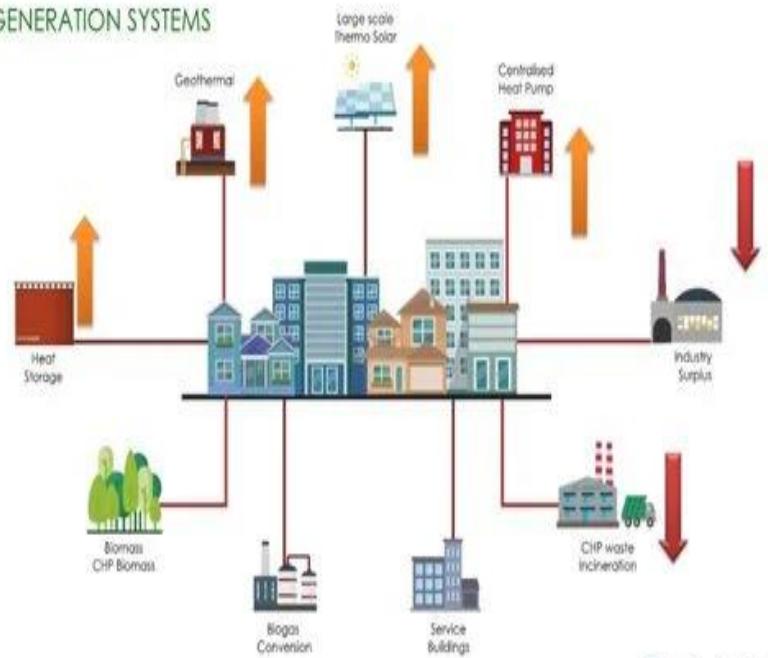
# Examples: renewable power



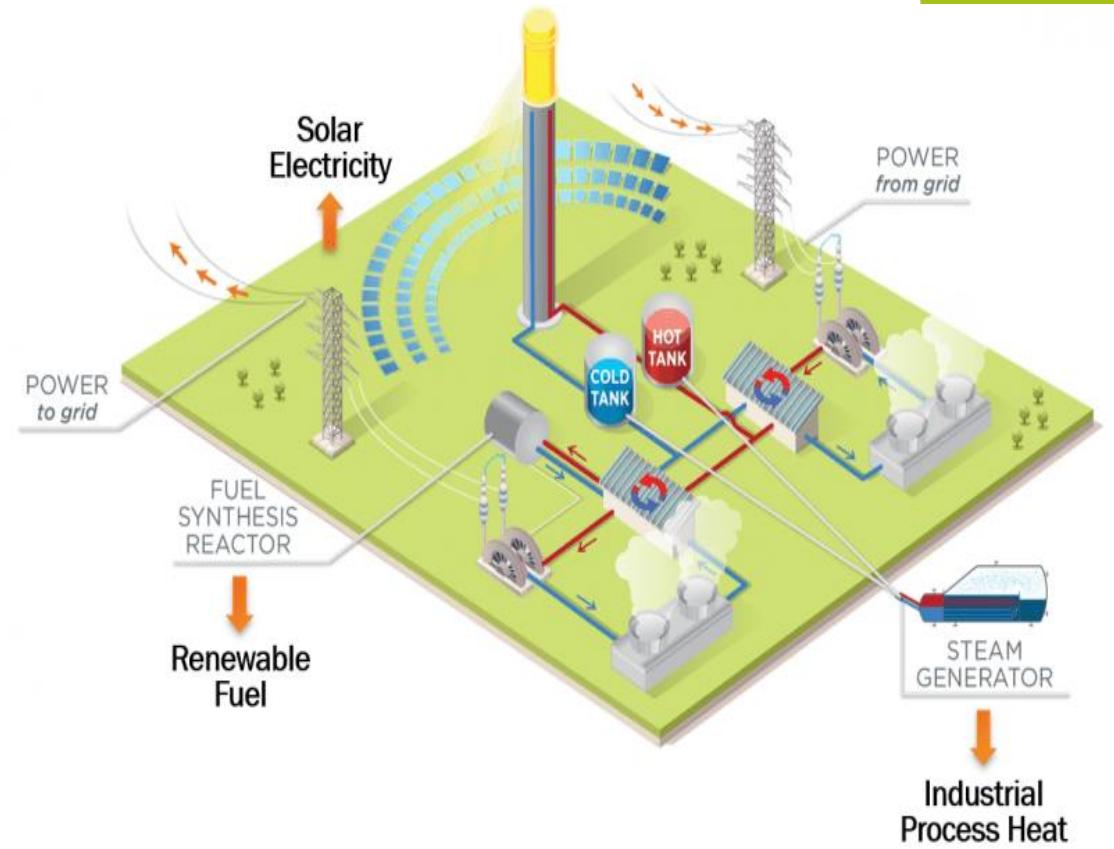


# Examples renewable heat

## HEAT GENERATION SYSTEMS

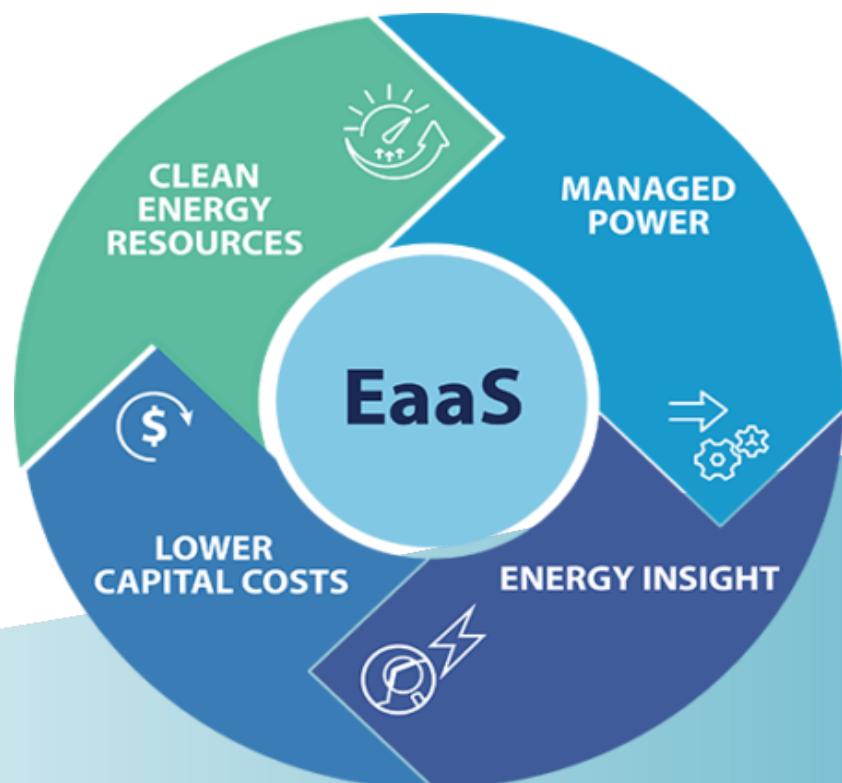


**ARANER**





# Examples “as a service”



<https://www.wbcsd.org/Pathways/Energy/News/Heat-as-a-Service-how-companies-can-use-this-innovative-solution-on-their-decarbonization-journey>

# CSRD vanuit accountantperspectief

Michiel Hondema

28-02-2024

# Corporate Sustainability Reporting Directive (CSRD)

## from accountant perspective

28 February 2024



# Agenda

## About Mazars

1. Corporate Sustainability Reporting Directive (CSRD)
2. Double Materiality
3. Reporting Example



# About Mazars

## One company, worldwide - the Mazars Group



**95+**  
Countries and territories



**+ 47.000**  
Employees



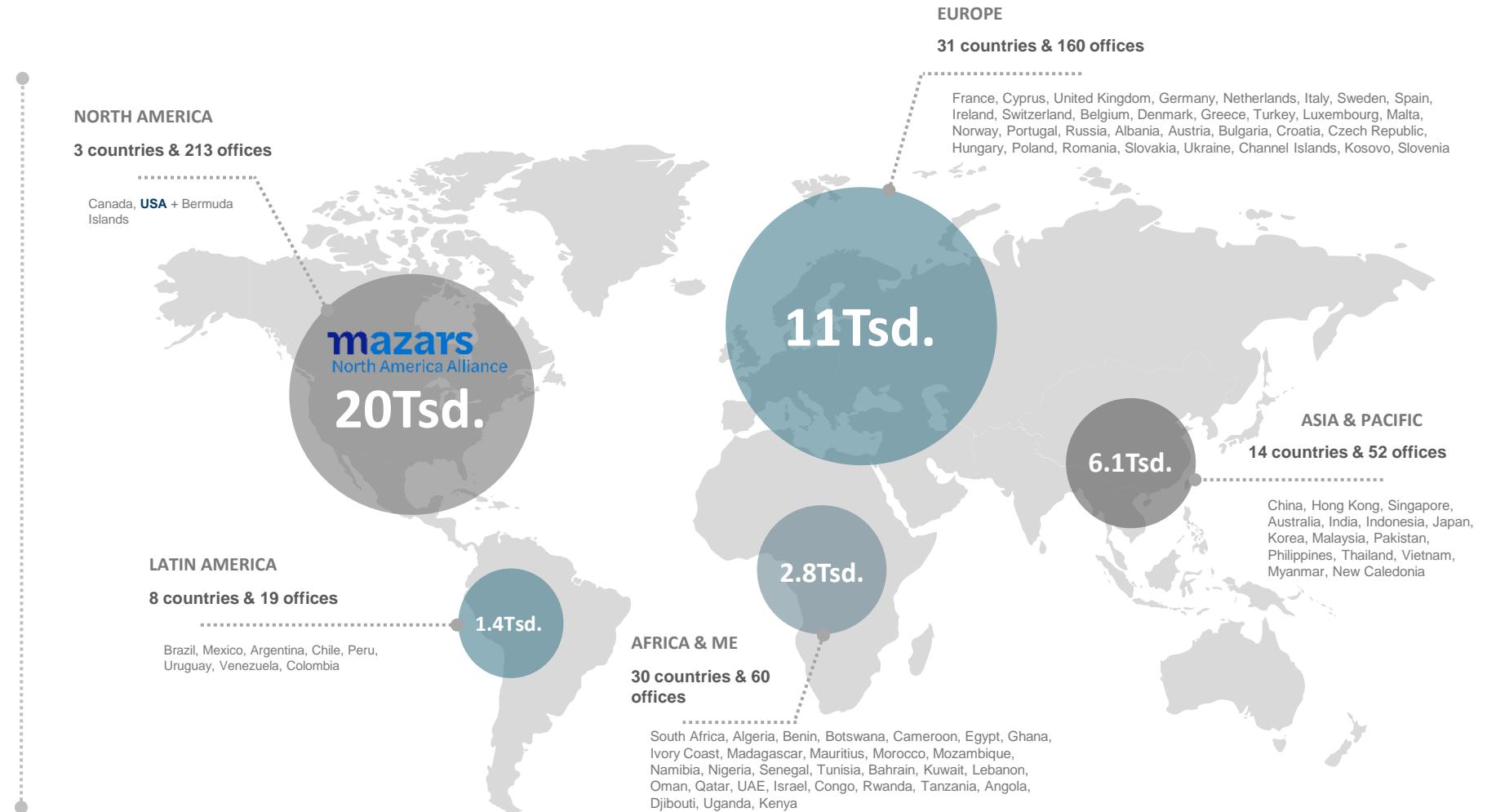
**+ 1.200**  
Partner



**500**  
Offices, 160 of them in Europe



**2,45**  
Billion euro fee income



# 01

## CSRD Introduction

# Impact of sustainability topics on the organisation

## How that impact influences reporting

### Annual report

Financial accounting

Impact of sustainability issues on financial statements

CSRD/ESRS

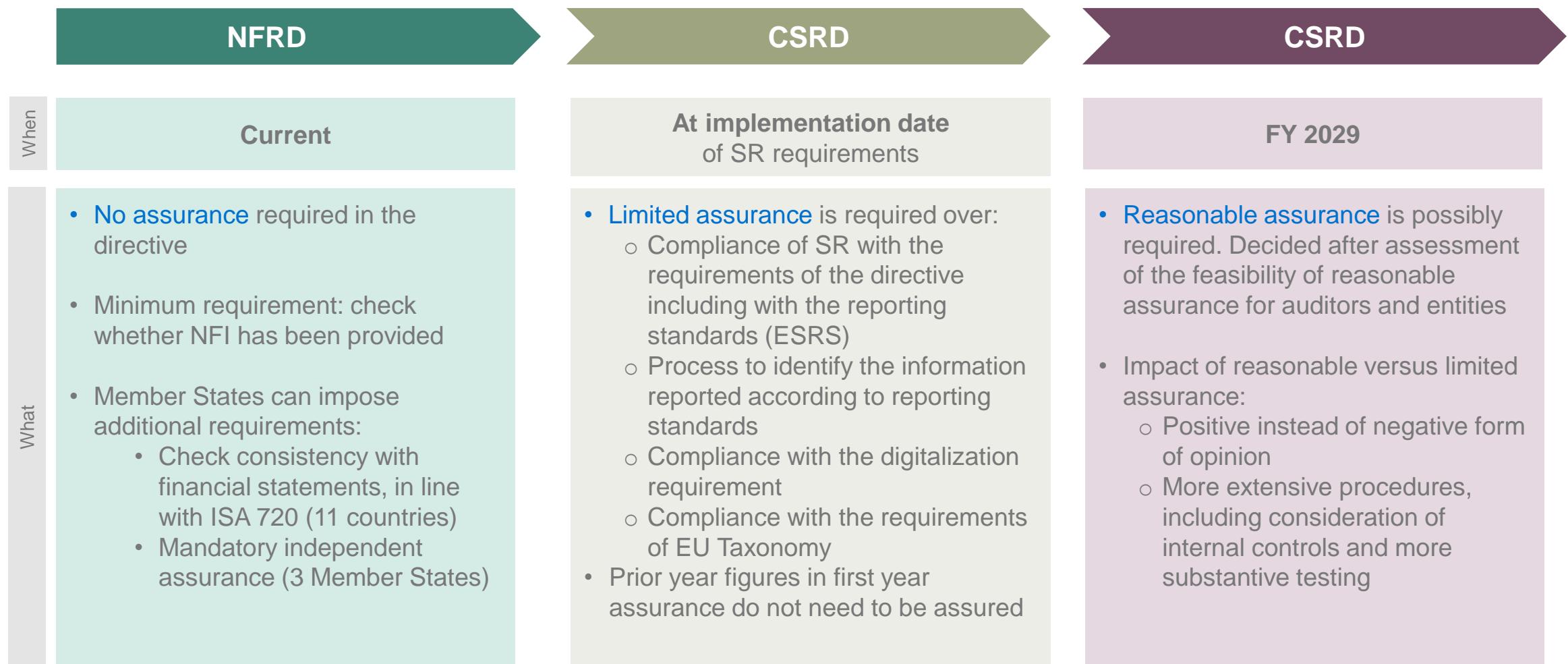
Non-financial impact, financial risks & opportunities

Board report and other information



# Development in assurance

CSRD will bring changes to the minimum level of assurance required over sustainability reporting (SR). All entities in the CSRD scope are under scope of assurance as well.



# Impact on the work of the accountant

## Assurance on sustainability information

**What does the accountant look at when providing assurance on sustainability information?**

- Uniform criteria
- Understanding the processes and control measures
  - Understanding the IT systems
  - Whether all the input is gathered via the (same) systems
- Numerical assessments
- Alignment of reporting to bridge-state
- Aligning bridge-state to systems / specifications
- Alignment of underlying information with specifications
  - Invoices/ purchase orders for purchased goods
  - Underlying documentation for impact determination

Extra complexity in the above due to the use of management experts and expert assurance providers



# What is the ESRS?

## Concepts

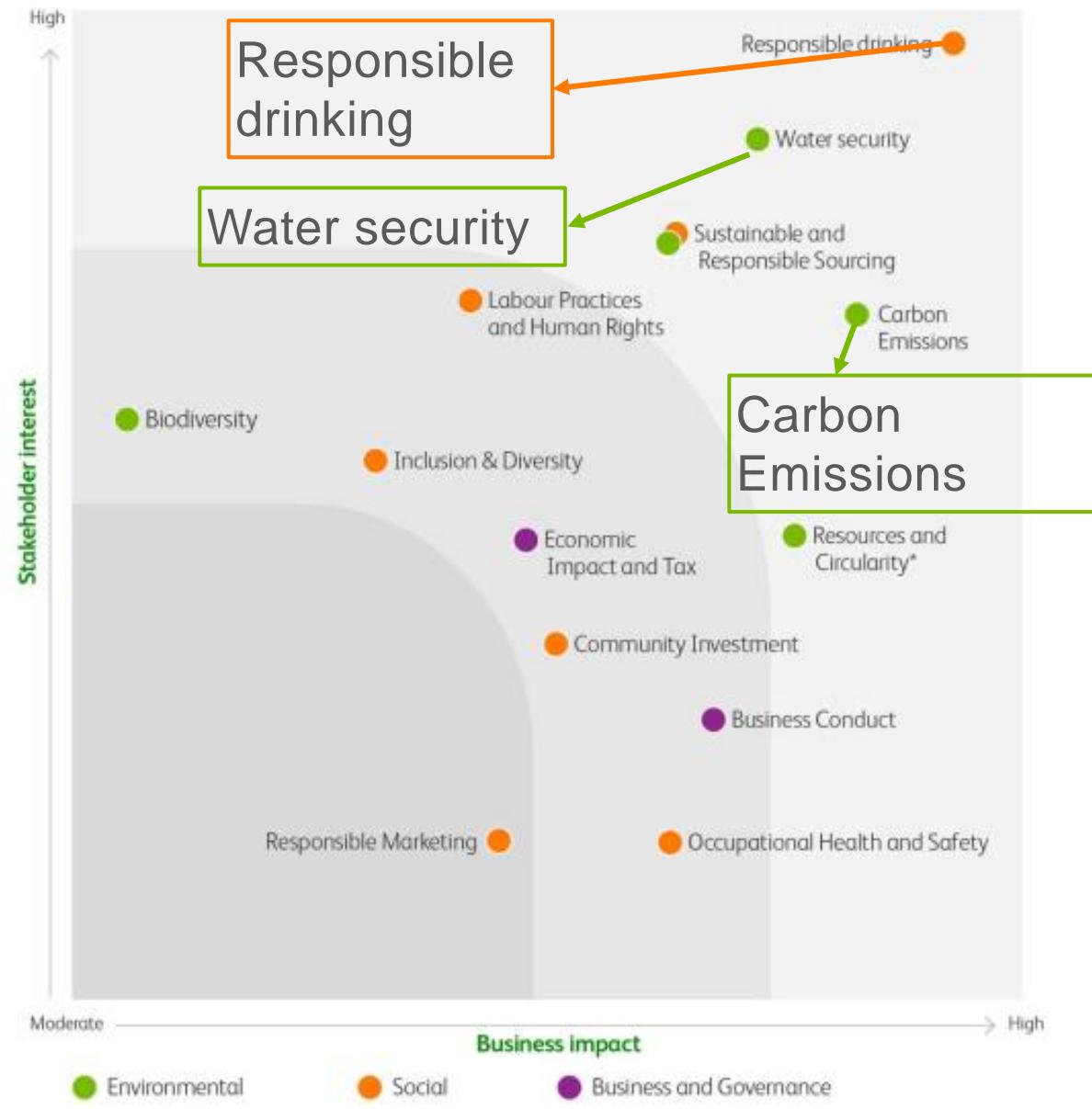
“Shall” disclose	Reporting obligation per <b>DR or data point</b> . Mandatory when mentioned in ESRS 1 or when it is a material subject.
“Shall” consider	Components that the entity should <b>consider</b> – when applicable – when preparing the DR or data point reporting → Considerations and background do not (always) need to be explained but must be documented so that this can be validated by the assurance provider.
“May” disclose or “may” consider	<b>Voluntary</b> disclosures or considerations in reporting
References to specific sectors	<b>Mandatory</b> disclosures for specific sectors → For example, at energy intensity based on turnover - ESRS E1 (DR E1-5), applicable in activities with high impact on the climate.

# 02

## Double Materiality Assessment

# Material Topics

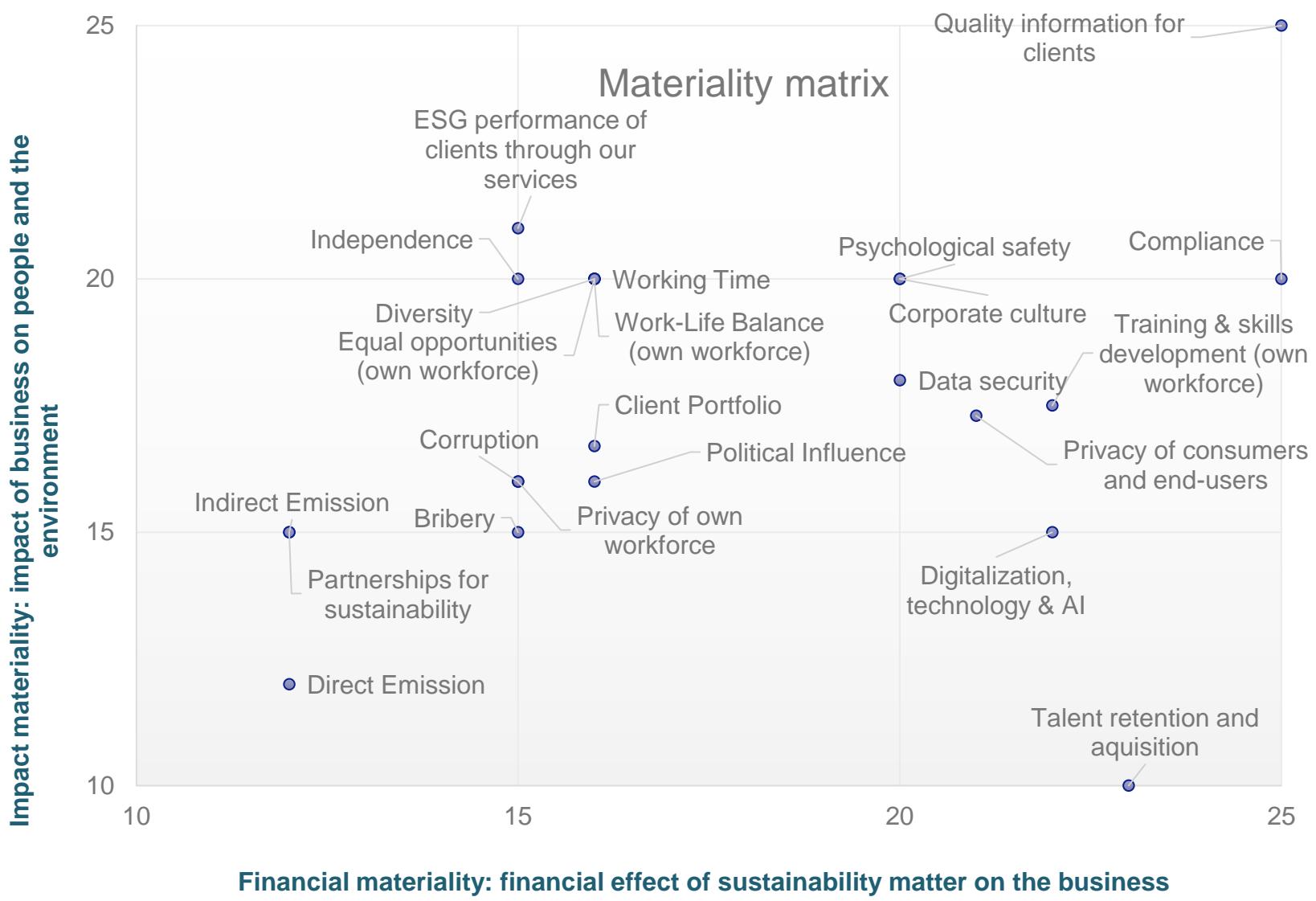
## Example Heineken 2022



Bron: Heineken jaarverslag 2022

# Material Topics

## Example Mazars NL

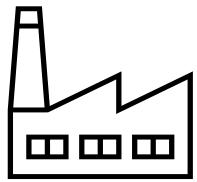


Source: Mazars NL

# Double Materiality

Are both **impact** and **financial** materiality taken into account?

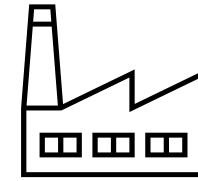
## Impact Materiality



Actual and potential negative and positive impacts of the company **on people and the environment** along the entire value chain.

Reporting on the impact (I) via metrics

## Financial Materiality



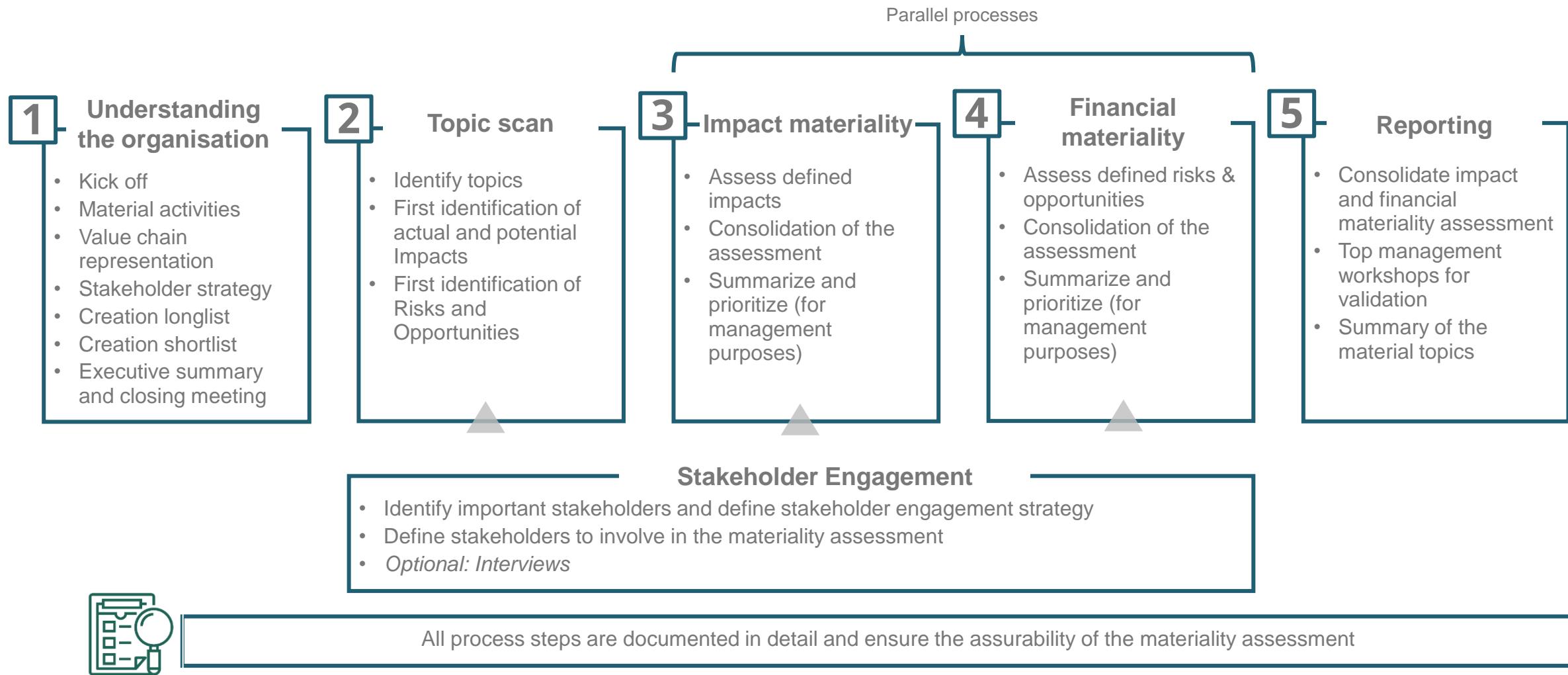
Sustainability matters that can positively or negatively affect **the value of a company and its financial development**.

Reporting on the financial risks and opportunities (ROs)

With regard to the legal requirements (CSRD/ESRS), both perspectives must be taken into account.

# Double Materiality

## The methodology followed?



# Understanding the organisation Are all topics taken into account?

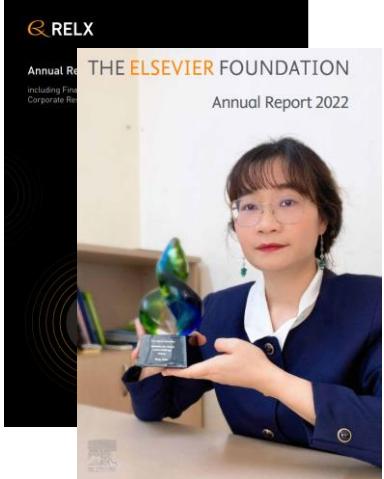
ESRS Topics

Internal documents

&

External sources

Peers



Frameworks



Media research

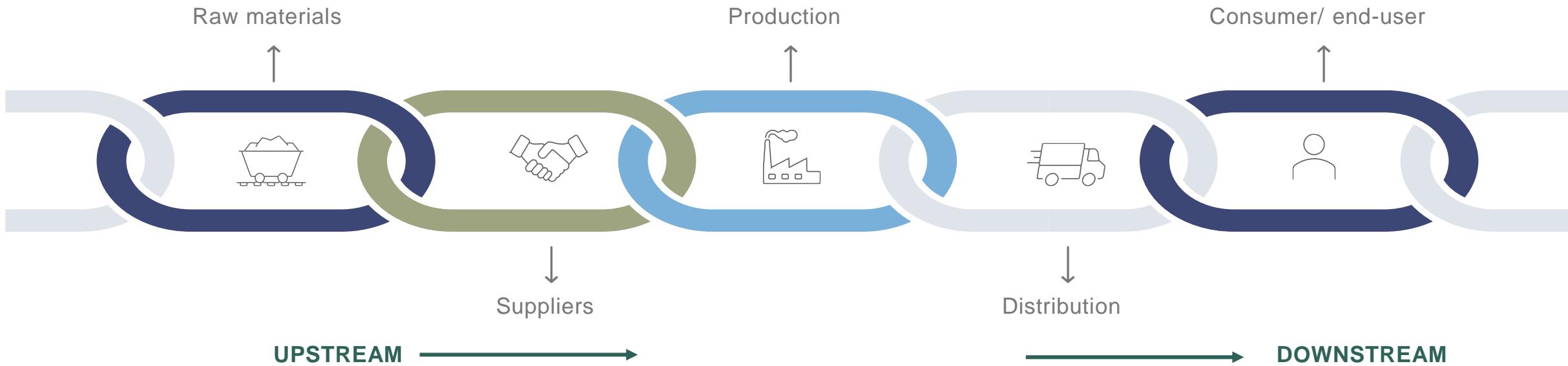


Benchmarks and country reports

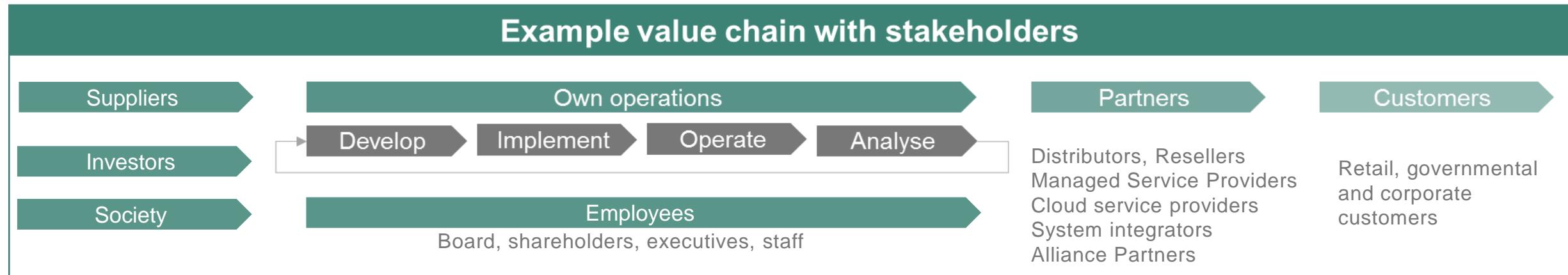


# Understanding the organisation

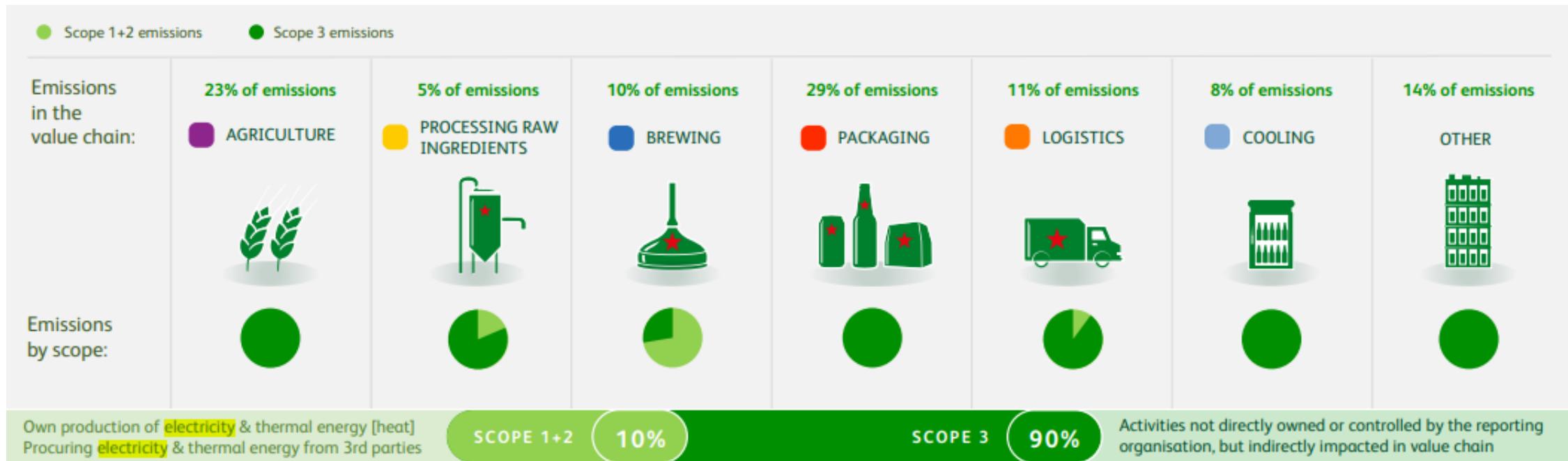
## What is your value chain?



### Example value chain with stakeholders



# Value chain Example Heineken



Source: Heineken annual report

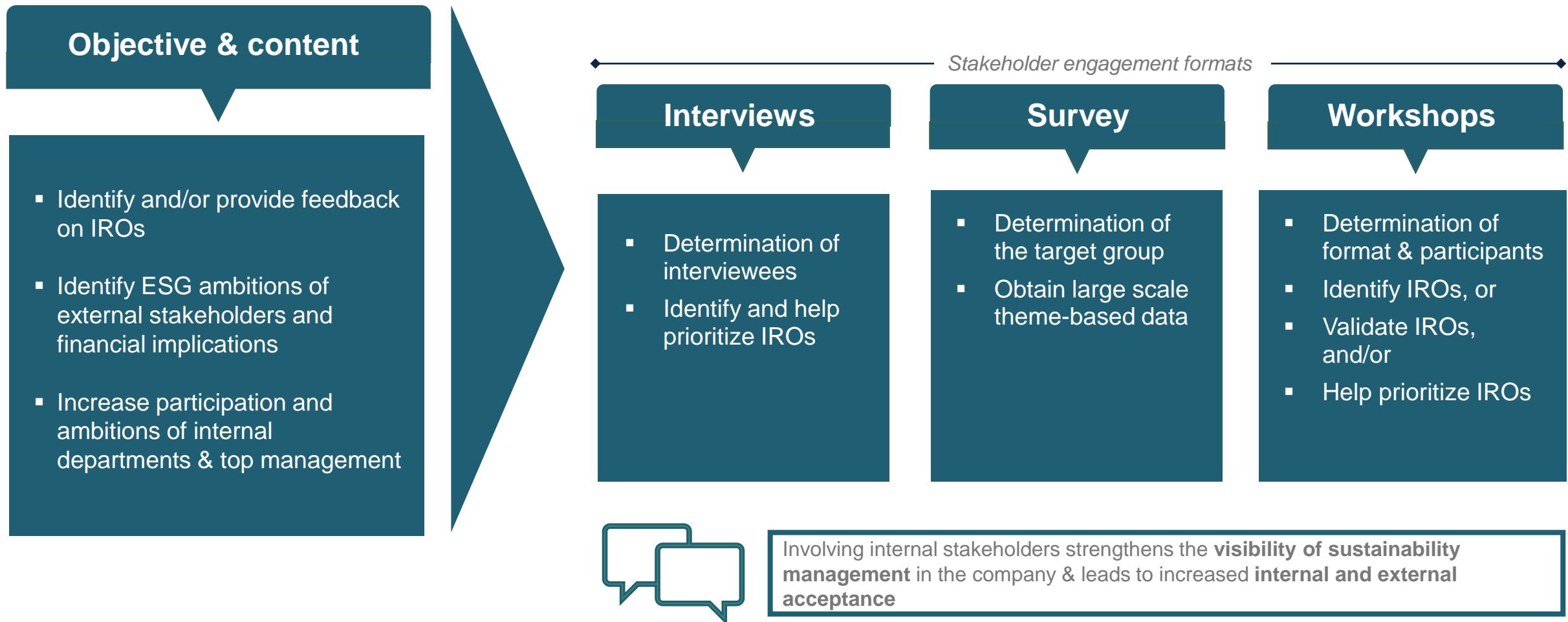
# Value chain

## Example Zeeman



# Understanding the organisation

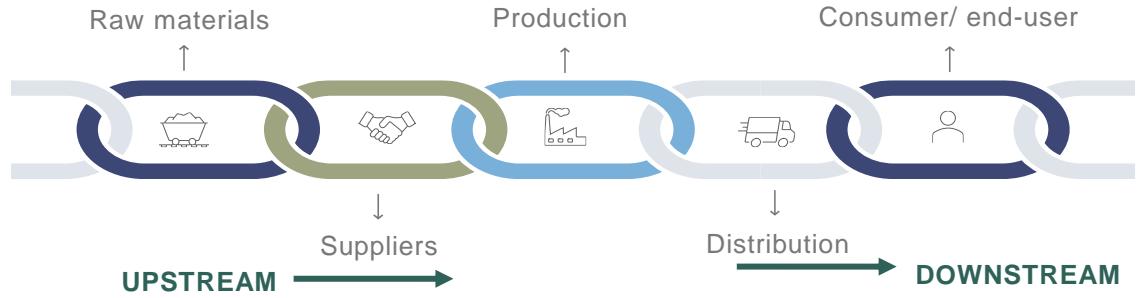
## Are the stakeholders engaged and how?



# Understanding the organization

## Why did you exclude topics?

Tips for excluding topics:



Which topics are relevant for the sector but not for the specifics of your organisation or its value chain?



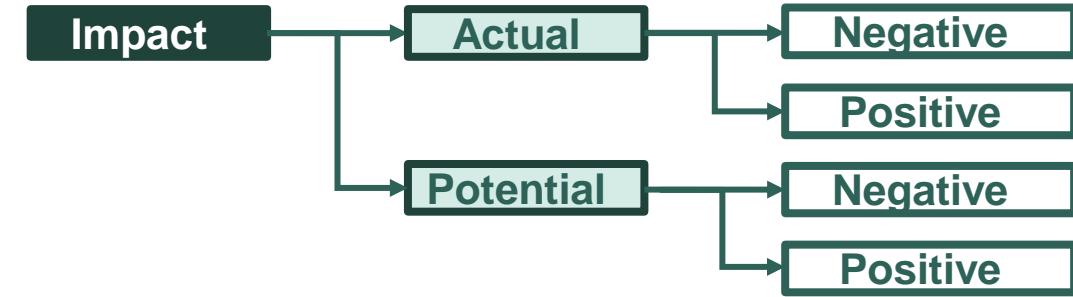
Not sure on whether a topic applies? Consult your stakeholders!



Make sure your exclusion reasons are substantiated and well-documented for reporting and audit purposes

Topic scan

What are the impacts per topic?



Example of impacts:



Topic scan

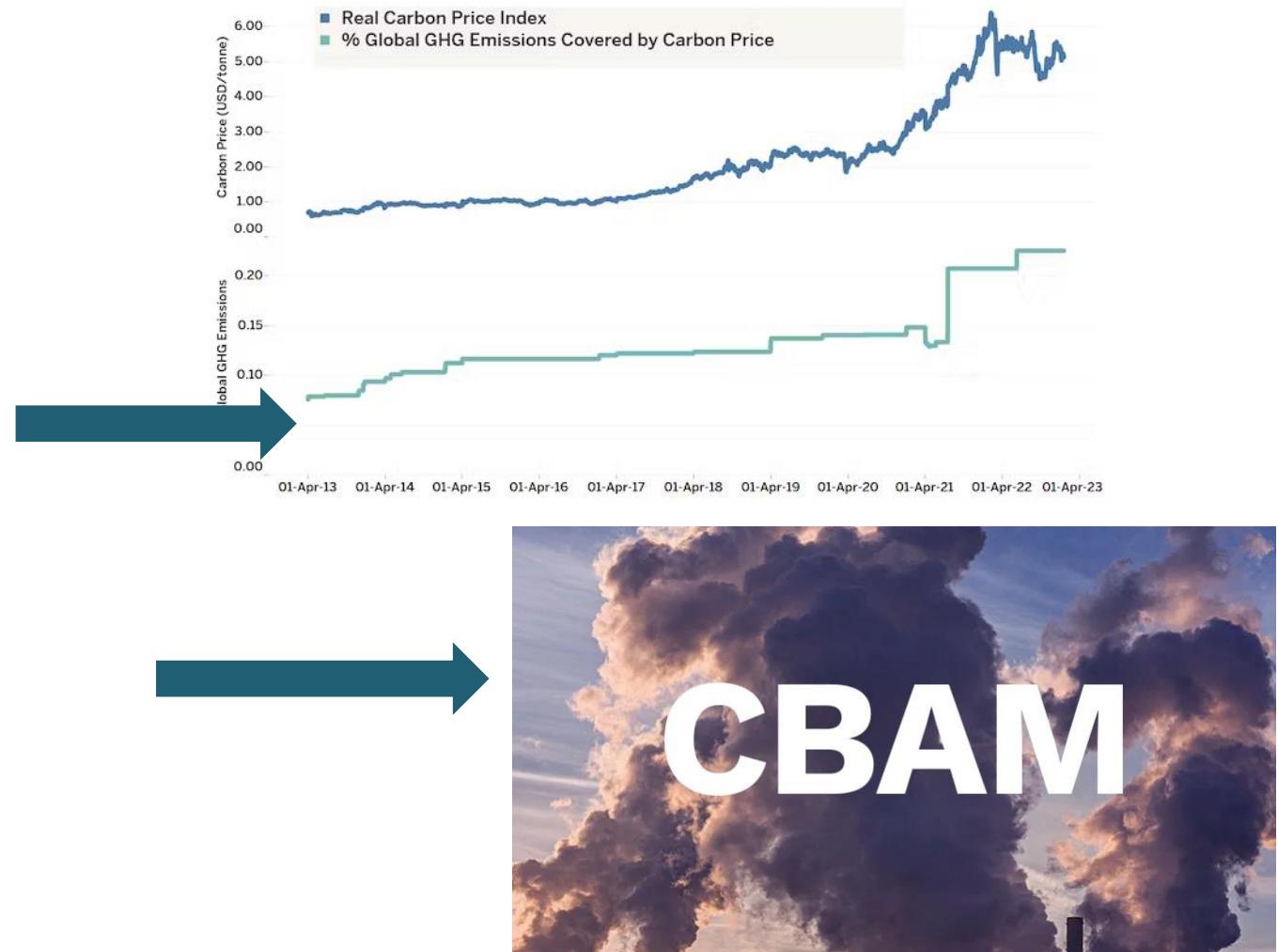
## What is the financial impact?

Financial

Risks

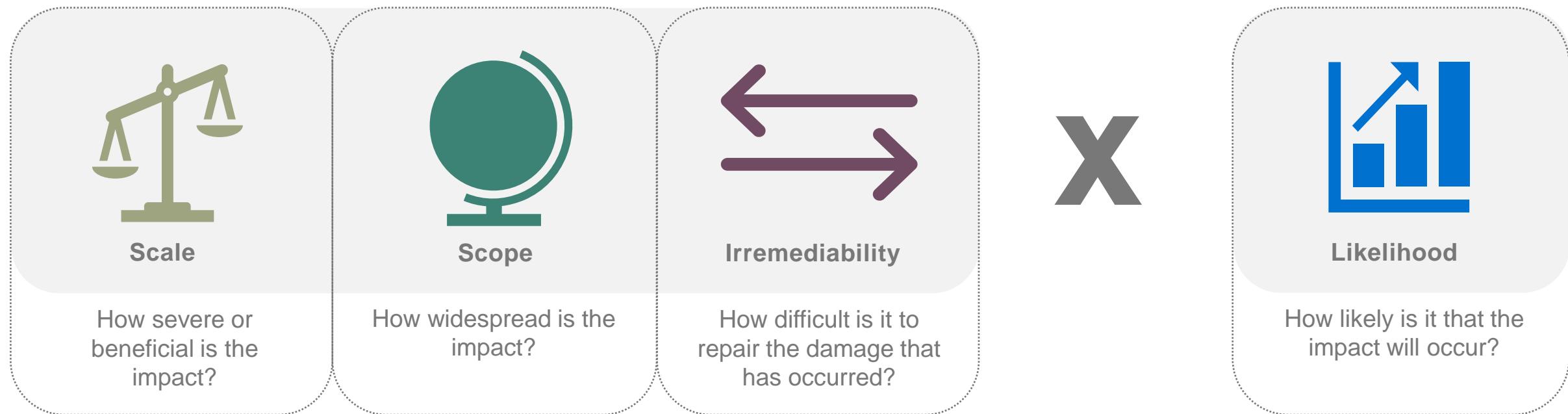
Opportunities

An example of risks and opportunities:



# Impact materiality

## How did you assess your impact?



## How did you assess your impact?

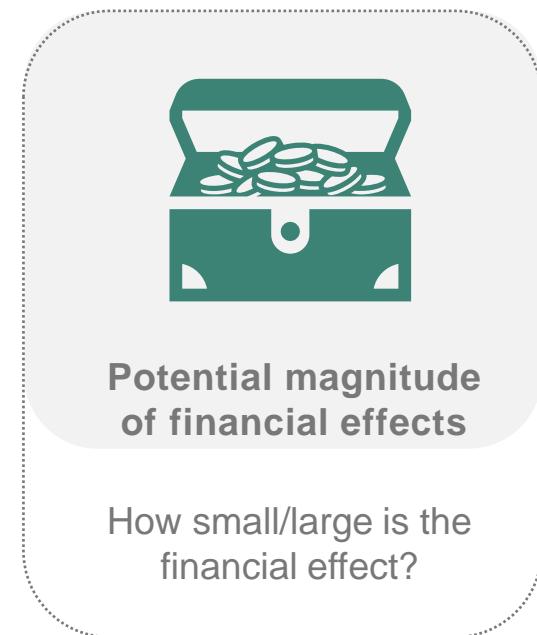
Sub-(sub)-topic	Scoring the sub-sub-topic					<i>= average of scale, scope and irremediability x likelihood</i>	<i>Potential if likelihood &lt; 5</i> <i>Actual if 5</i>
	Scale ▼	Scope ▼	Irremediability ▼	Likelihood ▼	Total		
<i>Impact description</i>	1 2 3 4 5	1 2 3 4 5	1 2 3 4 5	1 2 3 4 5			
Additional information							
	Time horizon ▼	Involvement ▼	Value chain ▼	Geography	Reasoning	Data source	
	Short term: 2027 Mid-term: 2030 Long-term: 2050	Business relationship Activities	To be determined	Specification of location and geography	Reasoning behind scores,	If available, corresponding data source on which assessment is based	

\*Example

# Financial materiality

## How did you assess the risks and opportunities?

How to assess your risks and opportunities?



X



# Financial materiality

## How did you assess the risks and opportunities?

### Scales

- To be aligned with Enterprise Risk Management practices
- EBITDA, cash flow, revenue, profit

Example of scales used for Mazars NL:

Likelihood	
5	very high (80-100%)
4	high (60-80%)
3	medium (40-60%)
2	low (20-40%)
1	very low (1-20%)

Size of the impact	Min effect EBITDA (%)	Max effect EBITDA (€)
1 Minimal	0,00%	€ 171.140
2 Informative	0,50%	€ 342.282
3 Important	1,00%	€ 855.705
4 Significant	2,50%	€ 1.711.412
5 Critical	5,00%	€ >1.711.413

mazars

# 03

## Reporting Example

# ESRS E1: Climate Change Reporting Obligations

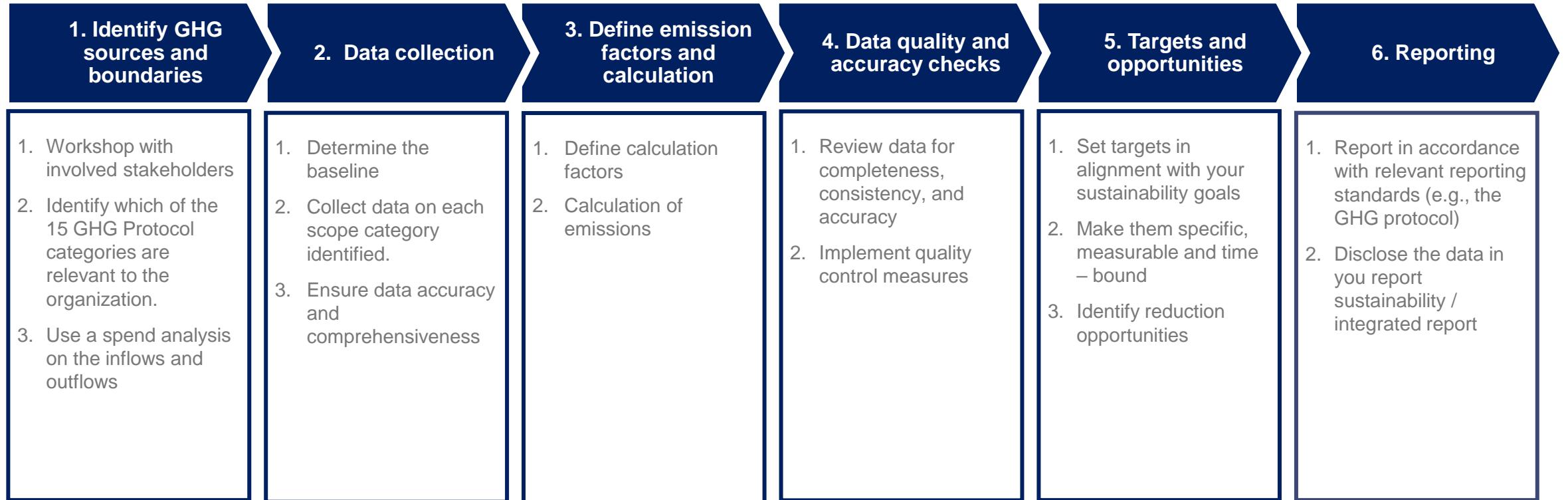
## Content

- E1-1 – Transition plan for climate change mitigation
- E1-2 – Policies related to climate change mitigation and adaptation
- E1-3 – Actions and resources in relation to climate policies
- E1-4 – Targets related to climate change mitigation and adaptation
- E1-5 – Energy consumption and mix
- E1-6 – Gross Scope 1, 2, 3 and total GHG emissions**
- E1-7 – GHG removals and GHG mitigation project financed
- E1-8 – Internal carbon pricing
- E1-9 – Potential financial effects from material physical and transition risks and potential climate-related opportunities



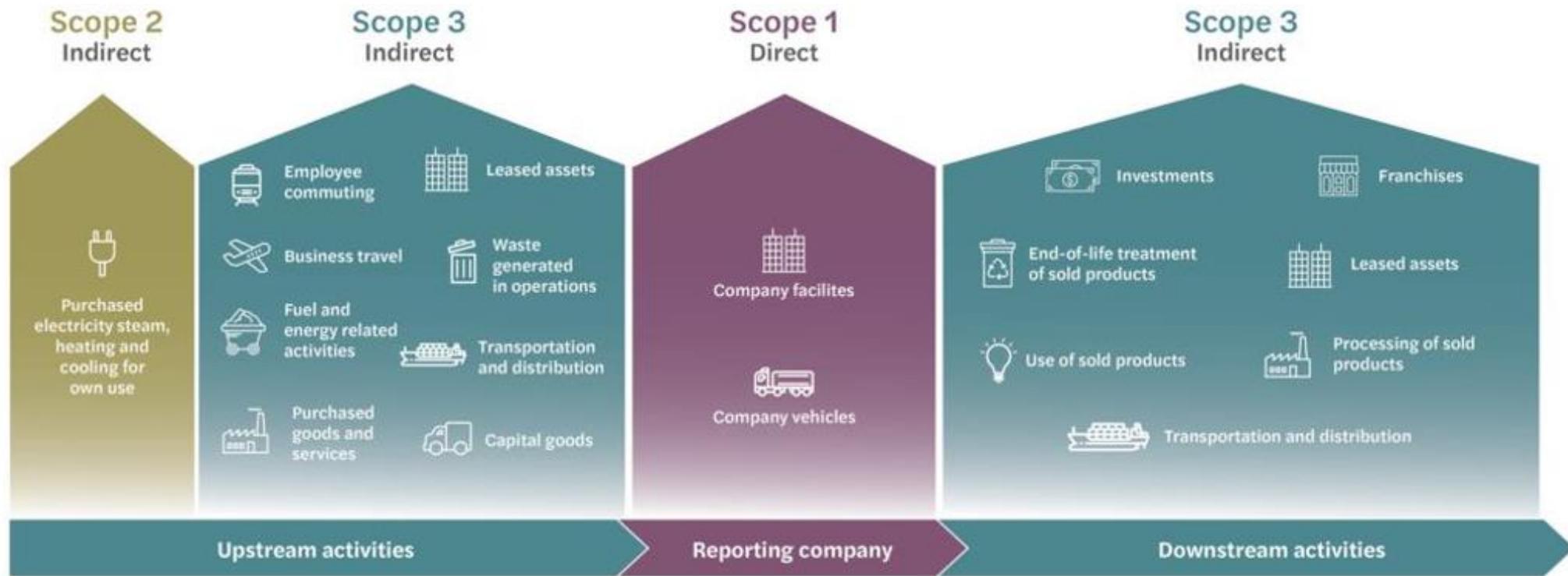
# Our service

## GHG emissions quantification methodology



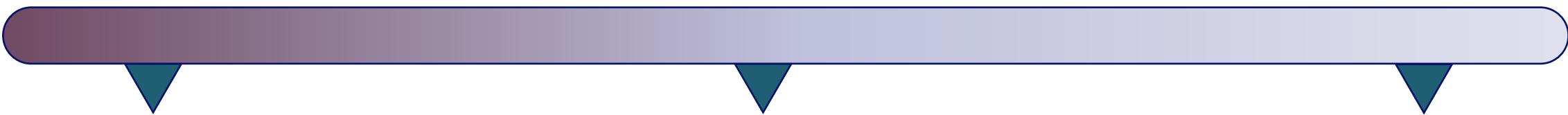
# Identify GHG Sources and boundaries

Which categories are relevant?



## Collect data

### Scope 3 - Indirect emissions



#### Supplier specific data

- Chain approach; in cooperation with suppliers
- Highest quality and most certainty

#### Average data

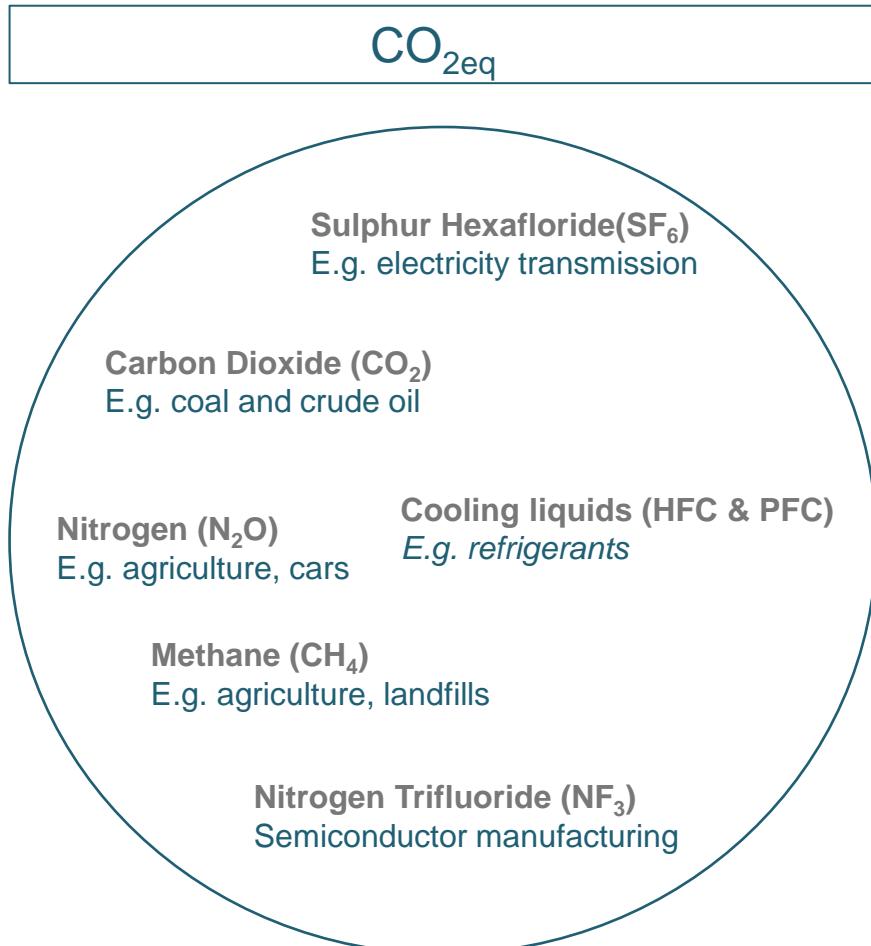
- Combination between vendor-specific data and public data sources
- Average quality, security and effort

#### Spend-based data

- Spending in sectors, linked to average CO<sub>2</sub>eq emissions per €
- Low quality, used for initial start-up

# Ensure data accuracy and comprehensiveness

## CO<sub>2</sub> or CO<sub>2eq</sub> ?

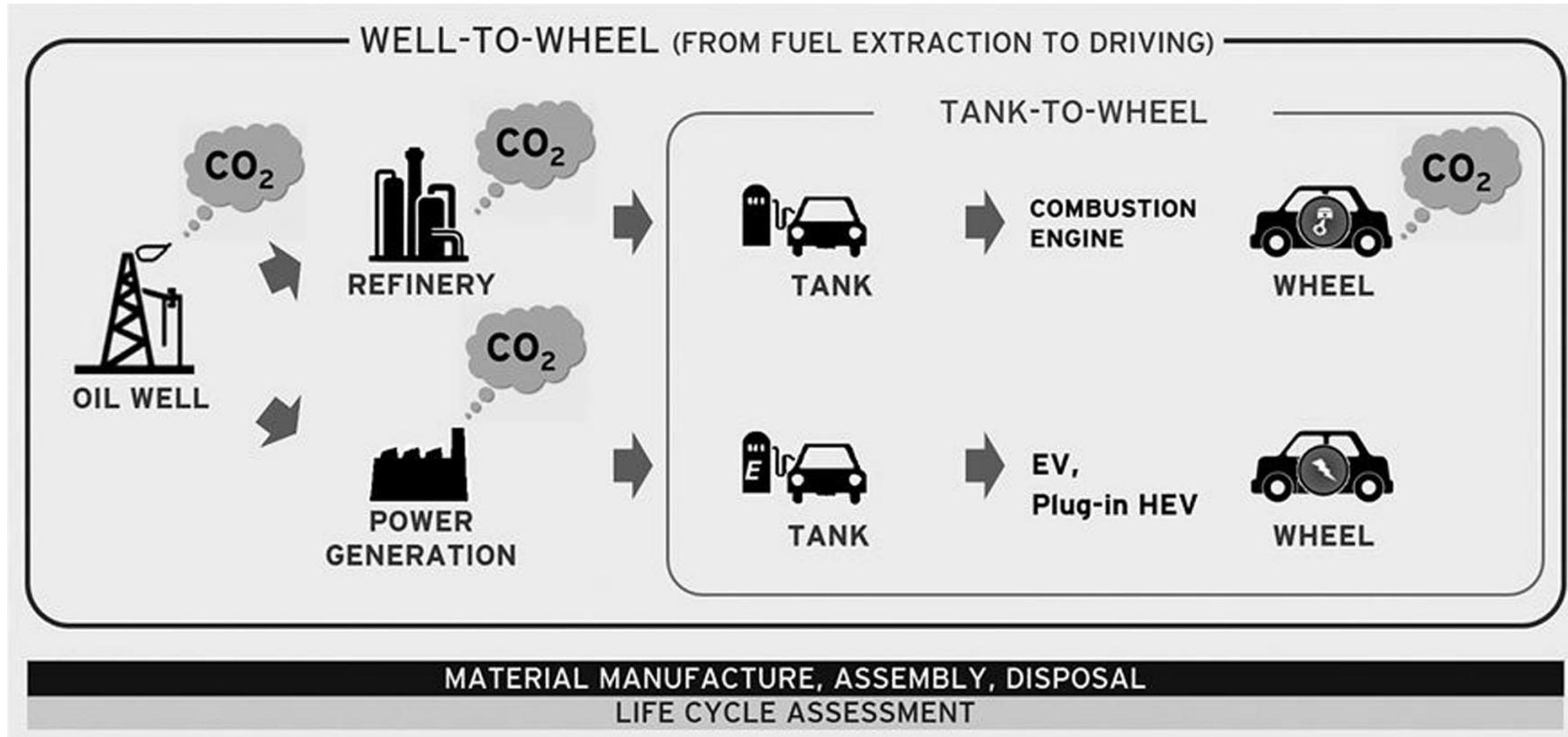


molecules	GWP100 (AR6)
CO <sub>2</sub>	1 kgCO <sub>2eq</sub>
CH <sub>4</sub>	29,8 kgCO <sub>2eq</sub>
N <sub>2</sub> O	273 kgCO <sub>2eq</sub>
SF <sub>6</sub>	22.800 kgCO <sub>2eq</sub>
NF <sub>3</sub>	16.800 kgCO <sub>2eq</sub>
Cooling liquids (HFC & PFC)	124 – 22.800 kgCO <sub>2eq</sub>

IPCC AR6 WG1, 2021, SPM p. 7

Ensure data accuracy and comprehensiveness

## Well – To – Wheel or Tank – To - Wheel ?



# Define emission factors and calculation

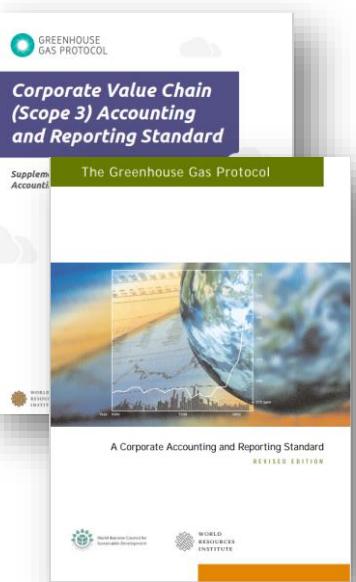
## Carbon footprint calculations

### Multiple 'standards'

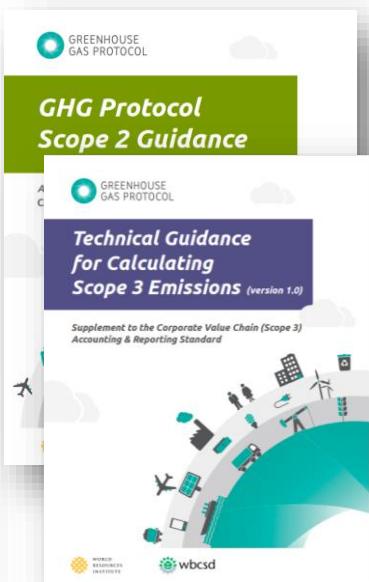


GREENHOUSE  
GAS PROTOCOL

Standards



Guidance



ISO 14064



EU ETS Calculation Methodology



CO<sub>2</sub>-PRESTATIELADDER



SCIENCE  
BASED  
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION



# Reporting ESRS guidance

## Calculation guidance - Gross Scopes 1, 2, 3 and Total GHG emissions

AR 48. The undertaking shall disclose its total GHG emissions disaggregated by Scopes 1 and 2 and significant Scope 3 in accordance with the table below.

Retrospective				Milestones and target year			
Base year	Comparative	N	% N / N-1	2025	2030	2050	Annual % Target / base year
Scope 1 GHG Emissions							
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)							
Scope 2							
Scope 3							

# Reporting

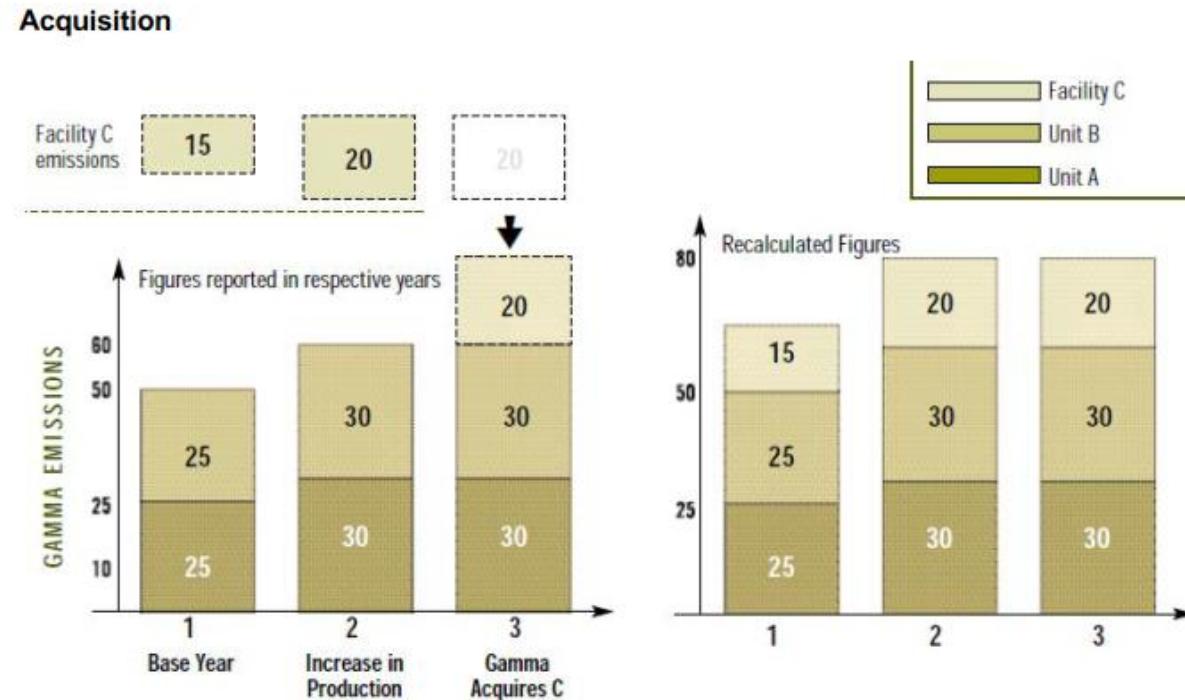
## Base year and recalibration.

Organizations can track emissions both retrospectively and into the future.

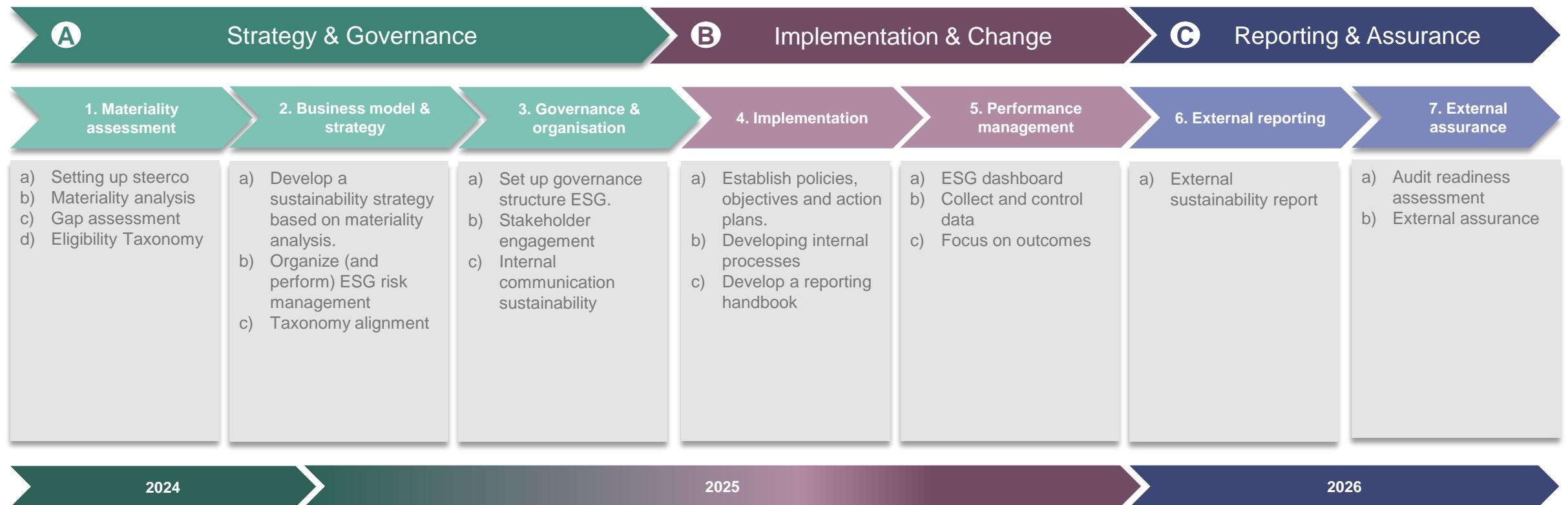
Voorbeeld:

For consistent monitoring of emissions over time, it may be necessary to recalculate the emissions from the base year when organizations undergo significant structural changes. When:

1. Acquisition
2. Divestment or selling off business units
3. Merges



# The double materiality is the starting point for reporting Mazars' 7-step plan for sustainable business operations and CSRD compliance



- The Double Materiality Assessment is the starting point for reporting in accordance with CSRD
- If an organization is subject to CSRD, it must do a Double Materiality Assessment, describe the process and update it periodically
- The Double Materiality Assessment can of course also be used voluntarily to shape sustainable business operations

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Mazars is een internationale, geïntegreerde accountants-, tax en adviesorganisatie. Wij nemen verantwoordelijkheid voor het vormgeven van een duurzame sector en willen bijdragen aan het creëren van een economische basis voor een eerlijke en welvarende wereld. Mazars opereert als een wereldwijde partnership met een geïntegreerd team van professionals op het gebied van audit, accountancy, tax en consultancy.

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# Afsluiting

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# Borrel

Bedankt en tot ziens!

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