## Federale Raad voor Duurzame Ontwikkeling

Brussel, 29 September 2022

Hilde Blomme, Deputy CEO, Accountancy Europe





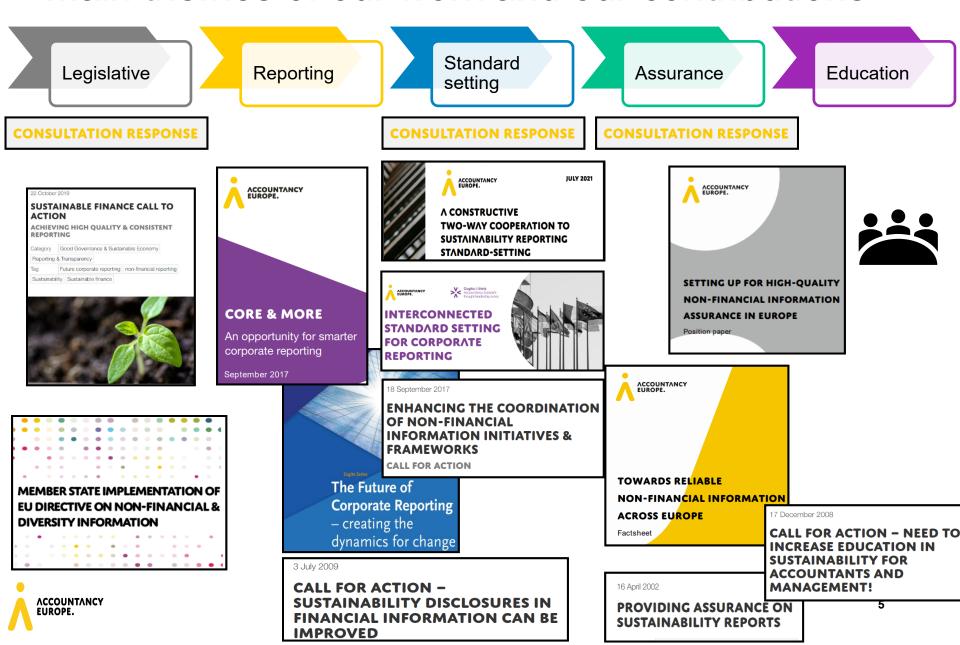
# ACCOUNTANCY EUROPE.

# WE REPRESENT ACCOUNTAINTS, AUDITORS & ADVISORS.

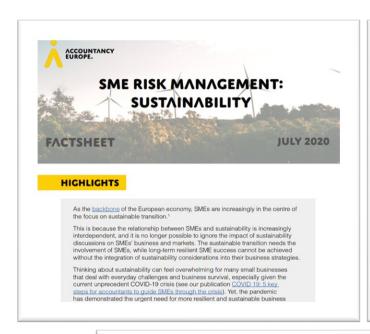
What have we done to help accountants prepare for their new role?

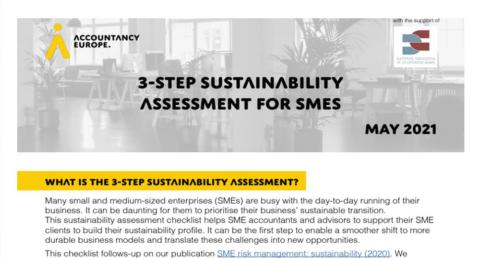


#### Main themes of our work and our contributions



#### Our work to support SMEs and SMPs





encourage users to adjust it according to evolving sustainability related developments, market,

partners' and authorities' expectations, and different SMEs' needs1.

5 July 2022

#### **NSIGHTS FROM SME ACCOUNTANTS:** PRACTITIONERS HELP SMES GO GREEN

BY JESPER ESMAN ANDERSEN, ROESGAARD

Good Governance & Sustainable Economy | Professional Matters Category

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SME support | SME/SMP | Sustainability





## Sustainability reporting: our response to ESRS

Focus on necessary DRs

Improve structure

Improve double materiality

Suggestions for phasing in

Need for robust due process

Aim for global alignment

Aim: transition to more sustainable business models

- Need consistency in ESRS
- Improve clarity and readability
- Avoid duplications
- Provide definitions and guidance
- Against the rebuttable presumption
- Need definitions, guidance and examples
- Reduce granularity
- 1.DRs that focus on business transition
- 2.Add DRs needed to comply with EU legislation
- 3.Add sector-specific DRs
- 4. Add value chain DRs
- DP before and in this ESRS consultation not ideal
- EFRAG's pressured to finalise in Nov'22
- Suggest EFRAG works in a more structured way

Improve collaboration with ISSB and GRI





CSRD, SMEs and sustainability



#### CSRD scope

Large companies



#### **Listed entities**

Except listed micro-enterprises



■ For listed SMEs: (1) simpler, proportionate standards applicable; (2) Possibility to opt out for the 2 first years

2026

2024/2025

Subsidiary exemption

Non-EU companies with branches/subsidiaries in the EU above certain thresholds

- €150M net turnover + a subsidiary/branch
  - Separate standards
- Not covering all reporting areas: impact focus, no reporting on risks



#### **CSRD -** value chain – impact for SMEs

"[...] a description of the principal actual or potential adverse impacts connected with the group's own operations and with its value chain[...]"



The CSRD allows a **3-year period** to phase- in the value chain requirements



#### Value chain and SMEs:

- Disclosure Requirements must be proportionate
- SMEs information as part of value chain limited to the information required by the ESRS for SMEs



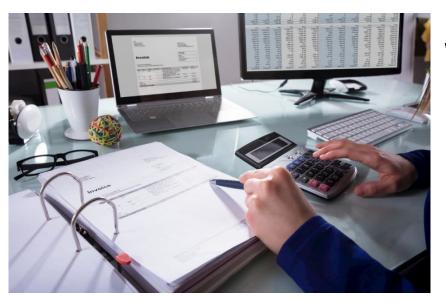
#### Why is sustainability relevant for SMEs?



- We spoke with our experts/SMPs on relevance for SMEs
- 5 key reasons:
  - Access to finance
  - Value chain requirements
  - Expectations from consumers, employees, new generations
  - Legislation
  - Sustainability urgency



## Role of accountants in supporting SMEs



## Why accountants?

Know clients' business

Ongoing professional relationship

Have experience from SME advice

#### What can they do?

Map supply chains

Assess risks, identify opportunities

Advice on funding access

Build partnerships in SME ecosystem





What can be done on national level?



## How can legislators help SMEs' transition?



- We discussed with our experts/SME accountants:
  - Free tools
  - Clear & simple benchmarks
  - SME support hubs
  - Financial assistance & incentives
  - Shift tax burden
- What would YOU propose at local/national/EU levels?



**CSRD**: sustainability assurance



#### **CSRD** - assurance



- EU-wide limited assurance requirement, ultimate goal is reasonable assurance (= audit)
- Statutory auditor opinion on sustainability reporting
  - EU Member States can permit another auditor or independence assurance service provider
  - National decision or leave to companies
- EC to adopt limited assurance standards by 1/10/2026
  - Time lag as assurance to be provided on 2024 reporting in 2025
  - National decision or leave to assurance providers
  - National decision on assurance report separate or not
- EC to adopt reasonable assurance standards by 1/10/2028



**CSRD**: professional education



#### **CSRD** – professional education of auditors

The Three E's: Education, Experience, and Exposure

- Theoretical & practical knowledge should be acquired on sustainability reporting and assurance via continuing education (CPD)
- 8 months of practical training in sustainability assurance or other sustainability related services + theoretical exam
  - To be organized by national (professional) bodies under public oversight (College van Toezicht of Bedrijfsrevisoren under FSMA)
  - Be practical





# **THANK YOU**

#### STAY CONNECTED



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# BECAUSE QUESTIONS COUNT.

