

## Appendix 2 – Comparative Summary of EU Institutional Positions in Proposed Amendments to the CSRD

Aspect	Commission's Proposal	Council's Position (23 June 2025)	Parliament's JURI Committee Draft Report (26 May 2025) (Parliament position pending)
<b>Scope — EU Reporting</b>	<p>EU companies or EU parents of groups with:</p> <p>(a) an average of more than 1,000 employees; and</p> <p>(b) either: (i) a turnover above €50 million; or (ii) a balance sheet total above €25 million</p>	<p>Maintains 1,000 employee threshold</p> <p>Further narrows scope by proposing a net turnover threshold of over €450 million</p>	<p>Proposes to increase threshold to 3,000 employees</p> <p>Further maintains scope proposed by the Council, i.e., increasing the net turnover threshold to €450 million</p>
<b>Scope — Non-EU Group Reporting</b>	<p>Proposes to (i) increase the EU net turnover threshold to €450 million (previously €150 million); and (ii) for the EU subsidiary limb, maintain the “large undertaking” criteria under the Accounting Directive; but (iii) for the EU branch limb, increase the net turnover threshold to €50 million (previously €40 million)</p>	<p>Aligned with the Commission's proposal</p>	<p>Proposes to increase: (i) the thresholds for the EU subsidiary limb to 3,000 employees <i>and</i> a net turnover of more than €450 million, and (ii) the net turnover threshold for the EU branch limb to €450 million</p>

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<b>Value Chain Reporting</b>	No changes proposed to CSRD reporting in relation to the undertaking's "value chain"	Aligned with the Commission's proposal	Proposes to replace the CSRD notion of "value chain" with the more limited concept of "chain of activities", to reach closer alignment with the CSDDD
<b>Value Chain Cap</b>	Proposes to introduce a Value Chain Cap so that CSRD-reporting companies can only request sustainability information from value-chain partners with 1,000 or fewer employees, to the extent covered by the new voluntary standard, with an exception for information commonly shared in the sector concerned	<p>Aligned with the Commission's proposal</p> <p>Proposes to add:</p> <ul style="list-style-type: none"> <li>(i) statutory right to decline to provide information exceeding the value chain cap; and</li> <li>(ii) information duties for CSRD-in scope companies</li> </ul>	<p>Proposes to raise the Value Chain Cap so that CSRD-reporting companies may only request sustainability information from value chain partners with up to 3,000 employees and annual net turnover not exceeding €450 million, and only to the extent covered by the new voluntary standard</p> <p>Proposes to maintain the sector-common information carve-out</p> <p>Proposes to add the option for CSRD in-scope companies to</p>

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			explain the efforts made to obtain the information that is incomplete, the reasons it could not be obtained, and the plans to obtain such information in the future
<b>Exemptions — Subsidiaries and Wave 1 “Stranded Entities”</b>	No specific subsidiary exemption or “stranded” entity exemption	Proposes to allow Member States to exempt “stranded” Wave 1 entities (i.e., public-interest entities with 501-1,000 employees that would be scoped out of CSRD from financial year 2027 but are in scope as Wave 1) from reporting for financial years 2025 and 2026	Proposes that a financial holding parent undertaking would be exempt from reporting obligations if not involved in management activities, provided that an operational subsidiary of the parent undertaking is designated to comply with such obligations
<b>Assurance</b>	Proposes that limited assurance is maintained, removing an option to move towards more stringent	Agrees with maintaining limited assurance	Agrees with maintaining limited assurance and proposes a deadline of 1 October 2026 for

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	reasonable assurance in the future  Commission to issue targeted assurance guidelines by 2026		Commission limited assurance standards