

Head of Cabinet Björn Seibert, Cabinet of Ursula von der Leyen
Head of Cabinet Michael Hager, Cabinet of Valdis Dombrovski
Head of Cabinet Cristina Dias, Cabinet of Maria Luís Albuquerque

3 March 2026

Omnibus I - Adoption of revised ESRS

Dear Sir/Madame

We – representing preparers, financial institutions (users and preparers) and auditors - fully support the efforts with Omnibus I to ensure the competitiveness of Europe and reducing the administrative burdens of sustainability reporting while safeguarding the green deal policy goals. The revision of the ESRS reporting standards is essential to meet these objectives through reduced reporting obligations while improving the focus on relevant and material reporting.

We would like to make it clear, that the fair presentation approach in the revised ESRS-standards is essential to meet the objectives of the Omnibus as it ensures a focussed sustainability report in accordance with CSRD without adding additional or unnecessary information. The concepts include a focus on “overall fair presentation”, “decision usefulness” and “not reporting information, that is not material”. Abandoning this would lead to more costly and less relevant reporting and would undermine our support to the proposed revisions.

We understand that there are concerns raised regarding the application of “fair presentation”. Amending this would undermine the structure and entire concept in the draft standards why we would like to stress the importance of keeping the concept unchanged. Notwithstanding the above, we would suggest – if need be – to clarify the scope of additional entity specific information and ways to ensure these requirements are limited to the scope of CSRD, and that “fair presentation” is to be determined based on CSRD requirements and does not include subjects beyond that.

Should this lead to any questions or concerns, we are more than happy to engage constructively.

Kind regards,
The Danish Funding Mechanism

Finance Denmark
Executive Director
Steen Lohmann Poulsen

Insurance & Pension Denmark
Director Executive Board
Per Geckler Møller

FSR – Danish Auditors
Deputy Director
Camilla Hesselby

Danish Chamber of Commerce
Executive Vice President
Jakob-Ellemann Jensen

Confederation of Danish Industry
Deputy Director General
Morten Høyer