

FSR – danish auditors’ detailed comments for the revised ESRS (Have-your-say)

3. June 2026

Introduction

This memorandum sets out FSR's observations on the draft revised ESRS and supplements the 4,000-character feedback submitted via the Have-Your-Say portal.

FSR – Danish Auditors welcomes the opportunity to comment on the draft Commission Delegated Regulation amending Delegated Regulation (EU) 2023/2772 regarding the simplification of the European sustainability reporting standards (ESRS). We support the simplification objective and acknowledge the substantial work undertaken by the Commission and EFRAG.

FSR – Danish Auditors
Børsgade 4, 4th floor
DK - 1215 Copenhagen K

Office phone: +45 7225 5703
Email: fsr@fsr.dk
www.fsr.dk

VAT: DK 55 09 72 16
Danske Bank
Reg.No.: 9541
Account no.: 2500102295
IBAN: DK1330002500102295

Due process as a quality criterion

While acknowledging the substantial work done regarding the revised ESRS, we also recognize that the process leading to this draft has been conducted under significant time pressure, and that all stakeholders have been required to engage with technically complex material in a short period of time. Due process is essential to ensure high-quality standards, as compressed timelines inevitably limit the ability to field-test revisions with stakeholders and leave ambiguities that create uncertainty in practice. We therefore strongly urge the commission that the lessons learned from this process are taken into account when designing the planned future revision of the ESRS, and that sufficient time is allocated to allow for meaningful stakeholder consultation as this would help ensure standards of greater clarity and quality.

Notwithstanding the above, we strongly support a swift adoption of the revised standards in their current form. Legal certainty in the near term is of significantly greater value to preparers, auditors, and users than further iteration.

Application and transition to the ESRS revised

FSR – danish auditors support the possibility for early adoption as this allows undertaking to make use of the revised standards and the embedded reliefs and improvements as soon as possible. In this context, the revised ESRS and the existing ESRS will coexist during a transitional period in which undertakings must determine which set of standards to apply and on what basis. To avoid uncertainty and inconsistent application, we recommend that the Commission state clearly that, for financial year 2026, undertakings must apply either the existing ESRS or the revised ESRS in their entirety. Clear transitional rules and guidance will help prevent disruptions for preparers, users, and auditors during the first year of optional application.

The need for implementation guidance and interpretive clarity

The revised ESRS contains a large number of textual, structural, and conceptual changes compared to the existing standards. For many of these changes, it is not evident from the text alone whether a change is intended to represent a substantive shift in requirements or an editorial reformulation. This ambiguity is not a marginal concern. Without clear guidance, preparers, auditors, and supervisors are likely to interpret and apply the revised standards inconsistently, thereby undermining the objective of simplification that underpins the broader policy vision behind the Omnibus revisions to the CSRD and ESRS.

We therefore encourage the Commission and EFRAG to issue concrete implementation guidance, updated FAQs and worked examples following the adoption of the revised standards. For each material change, the guidance should indicate clearly whether the amendment is substantive relative to the existing ESRS and what its practical consequences are for preparers and auditors.

One area where guidance is particularly relevant concerns entity-specific information and, specifically, when such information is to be considered necessary. Without sufficient guidance, there is a risk that inconsistent and divergent practices will emerge among preparers. We therefore call on the Commission and EFRAG to provide concrete guidance on the conditions under which entity-specific information is required.

Alignment with established reporting frameworks and terminology

We welcome the Commission's objective of enhancing the interoperability of the ESRS with global sustainability reporting standards such as the IFRS, and we consider this an important quality criterion for the revised standards. In support of this objective, we would encourage the Commission and EFRAG to anchor concepts and terminology in established reporting frameworks wherever this is compatible with the simplification objective – drawing on the Accounting Directive, other Union legislation, and relevant international standards such as the IFRS where appropriate. Where an established concept already exists in such frameworks, adopting it by reference rather than creating a parallel terminology would reduce interpretation risk and support consistent application.

FSR – Danish auditors remain at the disposal of the Commission to discuss any of the points raised in this memorandum.

Kind regards,

Marianne Ploug
Head of audit and accounting

Sigurd Seerup
Sustainability consultant