

FSR – danish auditors' detailed comments for the voluntary standard (Have-your-say)

3. June 2026

Introduction

FSR – Danish Auditors welcomes the opportunity to comment on the draft sustainability reporting standard for voluntary use (the "Voluntary Standard" or "VS"). We support a swift adoption of the Voluntary Standard and acknowledge the substantial work undertaken by the Commission and EFRAG in developing it. The Voluntary Standard is largely based on the VSME, which has been developed with a particular focus on the SME segment. We support, however, that the standard can also be applied by other undertakings outside the CSRD scope as a framework that promotes comparability and quality in voluntary sustainability reporting.

The observations we raise in this memorandum are intended as constructive suggestions that, in our view, could either be considered before adoption or addressed at a later stage through guidance.

This memorandum supplements the 4,000-character feedback submitted via the Have-Your-Say portal.

Practical application and guidance

The need for accessible implementation guidance applies with particular importance to the Voluntary Standard. A part of the intended user base – including smaller undertakings, undertakings without prior experience of sustainability reporting, and undertakings reporting in response to information requests from CSRD-scoped counterparties – will often have limited resources to interpret the standard independently. We therefore encourage the Commission and EFRAG to issue concrete implementation guidance following adoption, including illustrations of how the Basic and Comprehensive modules work in practice and how the VS interacts with the value-chain reporting cap in the revised ESRS.

In developing such guidance, we encourage the Commission and EFRAG to consider the degree to which the VS and the ESRS are aligned in terms of their underlying concepts and principles. Overarching concepts that are central to the ESRS framework – including the materiality assessment and the identification and assessment of impacts, risks and opportunities – are not explicitly represented in the VS, and it is not readily apparent how undertakings should relate to or build upon these concepts within the VS framework. This creates practical uncertainty for undertakings that have previously applied ESRS concepts and now wish to report in accordance with the VS, as well as for undertakings that may seek to transition to full ESRS application in the future. We therefore encourage the Commission and EFRAG to provide guidance that clarifies how undertakings in these situations should navigate the relationship between the two

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frameworks, and how ESRS concepts can be meaningfully utilized within the context of the VS.

Consistency and precision in the draft standard

A well-functioning voluntary standard depends on internal consistency and precision, both to support preparers in applying it and to ensure that the disclosures it produces are meaningful and comparable. In the course of our review, a number of provisions were identified where the current drafting gives rise to uncertainty that could usefully be resolved before adoption.

One example concerns the bracketed headers used throughout the standard. Paragraph 12 opens with the header "[Consideration when reporting sector information]", which signals to the reader that the following requirements relate only to sector-specific information. The text of the paragraph, however, also addresses information that is specific to the undertaking – a broader scope than the header suggests. Since the same bracketed header is used in relation to various disclosure requirements throughout the standard, this risks creating a systematic misunderstanding of the boundaries for reporting additional information. Replacing the header with "[Consideration when reporting additional information]", or similar, would more accurately reflect the provision's intent and reduce the risk of misapplication, if the intention is to provide undertakings with the possibility of adding additional information that are specific to the undertaking – in particular where undertakings wish to include information specific to their own circumstances, rather than information that is common across their sector.

Another observation concerns paragraph 17, which states that subsidiary undertakings are exempted from reporting where the parent has prepared its sustainability report on a consolidated basis. In the context of a voluntary standard, the purpose of this provision is not immediately clear. It is uncertain whether the exemption is intended to interact with the value-chain reporting cap in the revised ESRS – such that information requests cannot be directed to subsidiaries where the parent already reports on a consolidated basis – or whether it serves a different purpose. Clarification of the provision's intent, ideally in the standard itself and at a minimum in accompanying guidance, would be helpful.

Finally, paragraph 49 (DR B3) refers specifically to "SMEs" when describing which undertakings are likely to have significant Scope 3 categories. Since the Voluntary Standard is intended for undertakings of up to 1,000 employees – a population that extends well beyond the SME segment – this reference appears inconsistent with the broader user base of the standard. Replacing "SMEs" with "undertakings" would ensure that the provision is read correctly by all preparers to whom it applies.

FSR remains at the disposal of the Commission to discuss any of the points raised in this memorandum.

Kind regards,

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