

EFRAG Public Consultation – January 2024 - Questionnaire VSME Exposure Draft

1. DISCLAIMER

This questionnaire supports the development of the Exposure Draft for a Voluntary Standard for non-listed SMEs ('VSME ED'). The purpose of this consultation is to collect feedback from a variety of stakeholders on the content of its content.

The VSME ED is the result of EFRAG SRB and SR TEG and includes inputs from EFRAG Expert Working Group and the EFRAG VSME community as well as stakeholders outreach events. This work benefits from the research conducted by the SME working group "Cluster 8" of the EFRAG Project Task Force on European sustainability reporting standards.

The following background documents are included in the package to help respondents framing their responses:

Annex 1: VSME ED [link](#)

Annex 2: Basis for conclusions for VSME illustrating the reasoning behind the content of the ED [link](#)

Annex 3: Approach to Value Chain Cap in ESRS LSME ED and VSME ED [link](#)

Deadline for answer is 21 May 2024 (EoD)

2. SURVEY INTRODUCTION

Thank you for taking the time to complete this survey.

The purpose of this survey is to receive feedback from constituents on the VSME ED. The feedback will be collated by EFRAG Secretariat and analysed by EFRAG SR TEG and SRB to finalise the VSME draft for delivery to the European Commission ('EC').

Why VSME? EFRAG's work on a voluntary standard for non-listed micro, small and medium enterprises is outside the Corporate Sustainability Reporting Directive (CSRD).

As specified in the EC Q&A accompanying the adoption of the Delegated Acts ESRS in July 2023, EFRAG is developing simpler, a voluntary standard for use by non-listed SMEs to enable non-listed SMEs to respond to requests for sustainability information in an efficient and proportionate manner as well as to facilitate their participation in the transition to a sustainable economy. The EC SME Relief Package of September 2023 refers to the VSME ED as a measure to support SMEs in accessing sustainable finance and to reduce the reporting obligations by 25%.

The VSME ED will allow non-listed SMEs (including micro) to face growing requests for ESG data and to lower the entry barrier to reporting. Undertakings with no company statute (self-employed) are expected to use this VSME. The benefits of VSME will depend on market acceptance and recognition that the VSME ED is suitable to replace a substantial part of the various questionnaires (from lenders, corporates, investors) currently used to collect such information from SMEs.

Micro, small and medium undertakings are in number the vast majority of enterprises in Europe.

General approach to users' needs: When answering to the questions in this Survey and assessing the appropriateness of the proposed disclosures, respondents are invited to consider the perspective of the users' needs of this particular ED (users being primarily SMEs' business partners, i.e. lenders, other investors, corporates) and to take into account the capacities of the SMEs, especially as they are not in the scope of the CSRD. Such information is also expected to support the perspective of public interest.

In this questionnaire, if not differently specified, the terms "SMEs" and "undertaking(s)" refers to non-listed micro, small and medium undertakings in the scope of VSME ED.

If you have no opinion on a question you can skip the question.

3. INFORMATION ON SURVEY PARTICIPANT

First Name:

Harry

Last Name:

Marissen

Email

harry.marissen@zeroco2.nl

Organization:

Name of organization:

SRA

Type of organization:

Preparers are identified as those which choose to prepare a sustainability report under the VSME ED.

Users are identified as those using the sustainability information produced by applying VSME ED (in particular those are investors, lenders, large undertakings as SME's value chain partners).

Other

Please specify whether you are:

Accountant/Consulting services/Assurance provider

“Other” respondents can choose to respond either as as Preparers (proxy) or as Users (proxy). In this case, in addition they can provide complementary comments to cover the other perspective, using the last open question in Part 2 of the questionnaire.

Main country of operations:

Netherlands

Main sector of operations:

Manufacturing

Depending on the group you have selected, you will be asked different questions.

4. Survey structure and instructions

This survey is structured as follows:

A) Part 1: VSME ED – General key questions (CRITICAL, please consider answering all questions) (If you only wish to complete Part 3, please page through the questionnaire to there)

B) Part 2: VSME ED – Detailed questions on principles and datapoints in the 3 modules (ADDITIONAL, please complement your answers in part 1 by answering part 2 as much as possible) (If you do not wish to complete this part, please page through to Part 3 on the Value chain cap or the submission page as relevant)

C) Part 3: Value chain cap (Separate section on the role of VSME and LSME in respect to the trickle-down effect) value chain cap as determined by the ESRS LSME) (Please note that here you are requested to choose whether you want to respond in brief on this topic or in a more detail. Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.)

You can choose to answer any part on its own or combination with the other parts.

Survey instructions

Some questions in the survey will appear depending on your previous answers or choices. You will now be able to save your responses before final submission . Please note that EFRAG only considers completed surveys - partial submissions cannot be technically processed. You will receive an email with your response on submission.

5. A) Part 1: General key questions

A) PART 1: General Key Questions (CRITICAL)

a. Objective, simplifications and modules

Please refer to the text of VSME ED in [Annex 1](#) and to the text of Basis for conclusions for VSME ED in [Annex 2](#).

1. The objective of this ED is to provide a simple reporting tool, that can credibly replace a substantial part of the questionnaires used by business partners (lenders, investors and corporate clients) in requesting ESG data from SMEs and that can support SMEs in monitoring their sustainability performance. While the ED has been built mainly on the basis of questionnaires from business partners, the resulting information is expected to also benefit SMEs by improving their management of sustainability issues and, in this way, contribute to a more sustainable and inclusive economy.

Do you agree with this standard setting objective?

Yes

Please explain your answer:

SRA agrees with this objective. It is highly desirable to take the proportionality into account that is appropriate for SMEs. For this reason, it is desirable that this standard determines the maximum request by business partners. We therefore argue for a proportional reporting standard for SMEs that is not made available as voluntary, but is a mandatory framework for both the chain partners and the SME entrepreneur. This provides service providers, including accountants, with appropriate guidelines to support their clients in preparing sustainability accounts. It is our expectation that SME entrepreneurs will call on them to provide sustainability reports, as they already do for financial annual accounts and tax returns. A uniform standard will improve comparability and reduce the administrative burden on small and medium-sized enterprises.

2. VSME ED has been structured in three separate modules:

The Basic Module is the entry level for SMEs and the target for micro-SME; it is required also in case of use of one of the two other modules.

The Narrative-Policies, Actions and Targets (PAT) Module is expected to be used by SMEs that have already in place some formalised policies, actions and targets.

The Business Partners (BP) Module is expected to be used when an SME faces data requests from its business counterparties.

The following alternatives for reporting uses are possible under the VSME ED:

- 1) The Basic Module alone;
- 2) The Basic Module with the Narrative-PAT Module;
- 3) The Basic Module with the Business Partners (BP) Module;
- 4) All three Modules together.

Do you agree that these alternatives are appropriate to deal with the diversified undertakings in scope (both number of employees and economic sectors) in the context of the objective as stated in Q1 of this questionnaire?

Yes

Please explain your answer:

In our opinion, the design of the standard is a realistic interpretation of the operational possibilities for SMEs to report on their sustainability performance. What we want to argue for is that the modules should be leading for the request that banks and chain partners may make. The current practice is that corporate clients make a variety of requests to their suppliers in the SME sector. Due to this diversity of questionnaires, answering them is a very time-consuming and therefore costly process. That is why, in our opinion, the voluntary nature is not desirable, but it should be the case that an SME entrepreneur can derive certainty from the standard as a maximum request and that proportionality is thus guaranteed.

3. The Basic Module is written in simplified language to make it easily understandable for micro and SME undertakings, while ensuring clarity in terms defined by the ESRS with 12 disclosures to be reported. There is no need for a materiality analysis. Certain disclosures are required only if the undertaking considers them "applicable".

Do you agree that the Basic Module is proportionate, understandable (in terms of language), and has a reasonably complete set of disclosures to be used as a starting point?

No

Please explain your answer:

If answer is NO, please indicate the relevant disclosure.

The basic module does not require a materiality assessment. The question is to what extent the concept of 'applicable' leads to an appropriate selection of subjects. That is why we advocate certain sector-specific guidelines for selecting topics and that the reporting obligation is capped at these topics. This will improve the desired proportionality and efficiency. In our opinion, the basic module should include a minimum position.

4. The Narrative-Policies, Actions and Targets (PAT) Module is suggested in addition to disclosures in the Basic Module, to undertakings that have formalised and implemented PAT. Materiality analysis is required to determine and

disclose the sustainability matters that which sustainability matters are relevant for the undertaking.

Do you agree with the content of and approach to the Narrative-PAT Module, which is reserved to undertakings that have Policies, Actions and Targets (PAT) in place?

No

Please explain your answer:

A materiality analysis is required in the PAT module, but the way in which it is carried out is defined without obligation. It is our expectation that the most obvious topics will often be chosen, as they are included in Appendix B of the (draft) standard. It is important to keep the main objective of the standard in mind. Which supply chain information is relevant for which corporate companies to meet their reporting obligations? What information do financial institutions need to comply with the obligations under the SFDR? Limit the request to these topics and provide clear definitions of datapoints to be provided. In our contacts with bank representatives, it appears that their information needs are not necessarily in line with the design of the (draft) standard.

5. The Business Partners (BP) Module sets datapoints to be reported in addition to disclosures in the Basic Module, which are likely to be included in data requests from lenders, investors and corporate clients of the undertaking. Materiality analysis is required, in order to determine and disclose the sustainability matters that are relevant for the undertaking.

Do you agree with the content and approach to the Business Partners (BP) Module as a replacement and standardisation of information requests by business partners, being a proportionate but complete set of ESG disclosures?

No

Please explain your answer:

See the textual explanation under question 4. For the sake of proportionality, a clear, exhaustive list of topics with an explicit explanation of the content per data point is desirable. This approach will lead to uniformity and also more reliability of the information provided.

6. QUESTIONS

A) PART 1: General Key Questions (CRITICAL)

b. Sector guidance

6. Sustainability matters may be highly dependent on the specificities of the relevant sector(s) that the reporting undertaking operates in. Please select your recommended course of action for standard setting and guidance purposes on this matter.

Please note that your answer will be complemented by question 13 on the additional dimension of reporting including sectors.

Please select one:

Undertakings applying VSME ED should apply on a voluntary basis sector specific guidelines and disclosures applicable to both listed and non-listed SMEs, to be issued by EFRAG as a non-authoritative annex to the future sector-ESRS.

Please provide your comments, if any:

As indicated in the previous questions, SMEs need clear guidelines that cannot be interpreted in multiple ways. This must include clarity as to the extent to which the company is compliant and that this also provides legal certainty towards chain parties and financial institutions.

7. B) Part 2: Detailed questions on principles and datapoints

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

a. Principles for preparation

Please refer to the text of VSME ED in [Annex 1](#).

7. Do you agree with the proposed Principles for the preparation of the sustainability report in VSME ED?

Principles for the preparation of the sustainability report (Basic Module, Narrative-PAT Module, Business Partners Module)

	Please select:		Comment
	Agree	Disagree	
a) Complying with this Standard (paragraphs 9 and 10 in VSME ED)	X		To this end, it is desirable to further develop clear guidelines.
b) Preparation on a consolidated basis (paragraph 12 in VSME ED)	X		This depends on the needs of the requester.
c) Timing and location of the Sustainability Report (paragraphs 13, 14 and 15 in VSME ED)	X		If an SME has several deviating activities within its group, the consolidated information provided may not be sufficiently specific to meet the information needs of, for example, a corporate client.
d) Classified and sensitive information, and information on intellectual property, know-how or results of innovation (paragraph 16 in VSME ED)	X		

If you disagree please explain your reasoning:

Please select a principle:

Explanation:

8. Additional question on Preparation on a consolidated basis. The VSME ED recommends the undertakings that are parent of small and medium sized groups to prepare consolidated reports for their sustainability statement, i.e. to include data of their subsidiary/ies in the report.

Do you agree with this approach?

Yes

Please explain your answer:

If an SME has several deviating activities within its group, the consolidated information provided may not be sufficiently specific to meet the information needs of, for example, a corporate client.

9. Since non listed SMEs are outside the scope of CSRD, the subsidiary exemption (see CSRD Art. 19a9) does not apply to them. One proposal that EFRAG could consider is to include such exemption in VSME ED, as a further incentive to apply consolidated sustainability reporting.

Would you consider the inclusion of a subsidiary exemption to VSME ED as pertinent and feasible?

No

Please explain your answer:

The purpose of the survey from SMEs is different from the reporting obligation by large companies. In our opinion, it is desirable to limit the request and link it to a specific sector. Consolidated reporting is more likely to lead to ambiguity and limitations with regard to mutual comparability.

10. Additional information component including sectors (VSME ED par. 11, applicable to all the modules) Depending on the type of activities carried out, the inclusion of additional information about issues that are common to the undertaking's sector supports the provision of relevant, faithful, comparable, understandable and verifiable information. While acknowledging the difficulties that this requirement may raise for SMEs, the inclusion of this additional dimension was considered an important element of VSME ED to fulfil in particular-sector specific disclosures.

Do you agree with this approach?

No

Please explain your answer:

It is desirable to provide clear guidelines for each sector, taking into account the desired proportionality. With the current structure of paragraph 11, this is optional and can be completed at the discretion of the company or it offers chain parties an opportunity to request much more information than is desirable.

8. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

b. Basic Module

11. The Basic Module is the entry level for non-listed SMEs and has a highly simplified language. Ideally the undertaking should be able to produce these disclosures with limited help of consultants. It comprises 12 disclosures which have been mapped with existing voluntary initiatives (i.e. Nordic Sustainability reporting standards for SMEs, German Sustainability Code, CDP guide for SMEs etc.). These disclosures have been identified as recurring in the questionnaires analysed by the EFRAG Secretariat (please refer to *Annex 2 Basis for conclusions for VSME ED* for more details).

With reference to the proposed disclosure requirements, please include your answer in table below:

	Do you have comments on the inclusion and content of this disclosure?
Disclosure B 1 – Basis for Preparation	Part of Disclosure B1 includes the choice of the module on the basis of which the report will be made. This implies that a company should also have taken note of the Narrative-Pat and Business Partners module (options B to D). It is our expectation that entrepreneurs in the SME sector will call on their accountant to determine the right choice. This also applies to the choice of whether or not to report consolidated.
Disclosure B 2 – Practices for transitioning towards a more sustainable economy	This disclosure enables SMEs to show which activities they have already undertaken to make their operation more sustainable and therefore a good addition.
B 3 – Energy and greenhouse gas emissions	The source records of scope 1 and scope 2 emissions may be assumed to be available and relevant for all SMEs. In addition, it is our expectation that this information is particularly important from the point of view of the chain.
B 4 – Pollution of air, water and soil	The problem with this and subsequent environmental issues is the application of the concept of 'where applicable'. This can give rise to differences in interpretation and thus a diversity of justifications. It is our preference to link these to specific sectors, where there is a clear relationship with the sustainability topic.
B 5 – Biodiversity	See comment under B4
B 6 – Water	See comment under B4
B 7 – Resource use, circular economy, and waste management	See comment under B4
B 8 – Workforce – General characteristics	This information may be assumed to be readily available. The inclusion of this disclosure will therefore not lead to much additional administrative burden. However, the question is to what extent this information is important to requesting parties.
B 9 – Workforce - Health and Safety	See comment under B8.
B 10 – Workforce – Remuneration, collective bargaining, and training	See comment under B8.
B 111 – Workers in the value chain, affected communities, consumers and end-users	Partly in view of the limited requirements that are set for the materiality process, it is questionable whether this disclosure will be widely used in practice.
B 12 – Convictions and fines for corruption and bribery	The question is to what extent this disclosure meets the information needs of stakeholders and to what extent it is desirable for SMEs to report on this.

1 - This datapoint was not identified in any of the questionnaires analysed by EFRAG Secretariat but was inserted to keep consensus based on the recommendation by some EFRAG SRB members.

12. B3 to B7 require disclosure of environmental performance metrics. There are other schemes used by SMEs requiring reporting of similar metrics, such as the European Eco-Management and Audit Scheme (EMAS – Regulation

(EC) No. 1221/2009).

Do you see any potential for better alignment with those other reporting schemes?

No

Please explain your answer:

As indicated in previous topics, we would like to see a clear link between the sectors in which the SME is active and the metrics it must use to report on them. This creates clarity for both the author and the user of the information.

13. The guidance provided for B9 on the number of fatalities as a result of work-related injuries and work-related ill health refers to incidents arising during travel and, outside of the undertaking's responsibility (e.g. regular commuting to and from work). These incidents are subject to the applicable national legislation that regulates their categorisation as to whether these are work-related or not.

Is the practice in your country to include such incidents as work-related fatalities?

No

Please explain your answer including references to the relevant legislation.

In the Netherlands, there is an accident at work during work. Commuting is not included in this definition.

14. B10 (a) requires undertakings to disclose the relevant ratio of the entry level wage to the minimum wage, when a significant proportion of employees are compensated based on wages subject to minimum wage rules. This datapoint deviates from the disclosure requirement on adequate wages established in ESRS S1-10 – Adequate wages (from paragraphs 67 to 71) as a simplification (i.e., easier to collect).

Do you consider that this requirement will provide relevant and comparable information?

No

Please explain your answer:

It is precisely at the lower end of the labour market that employment relationships other than an employment contract are often used. It is important that the definition of own workforce is explicitly included in the metrics to be used.

15. B11 was drafted to cover, in a simplified way, a description of the process to identify material impacts and a description of those for workers in the value chain, affected communities and consumers/end-users. This disclosure is an exception to the general approach in the Basic Module where materiality does not apply. As a compromise, it was included as a voluntary disclosure.

Do you agree with this approach?

No

Please explain your answer:

Here there is a risk of cherry picking and therefore of selective performance. These impacts can be defined on the basis of sector analyses.

16. In order to help SMEs prepare the sustainability report, specific guidance has been developed for the Basic Module in paragraphs 87 to 167 of the VSME ED.

Do you think that it is useful for the preparation of the report? Do you think it is sufficient?

Yes

Please explain your answer or add suggestions:

The more clearly the metrics are defined, the more this will contribute to comparability and efficiency in the reporting process.

9. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

c. Approach to materiality of matters and Principles for preparation (common to Narrative-PAT and Business Partners Modules)

17. Do you think that the language and approach to the Principles of Materiality to be applied to the Narrative-PAT Module and Business Partners (BP) Module are proportionate for the undertakings in scope? Please include your feedback in the table below:

	Please select:		Comment
	Agree	Disagree	
Impact materiality (paragraphs 46-50 in VSME ED)	X		Depending on the size of the company, it is questionable whether SMEs are able to carry out this analysis independently, without the support of a consultant, such as an accountant.
Financial materiality (paragraphs 51-55 in VSME ED)	X		Depending on the size of the company, it is questionable whether SMEs are able to carry out this analysis independently, without the support of a consultant, such as an accountant.
Stakeholders and their relevance to the materiality analysis process (paragraphs 56 and 57 in VSME ED)	X		

18. The VSME ED requires performing a materiality analysis in order to disclose which of the sustainability matters listed in Annex B of VSME ED (which is the same as AR 16 of ESRS 1 General requirements) are material to the undertaking. Therefore, users will understand for which material matters the undertaking does not have Policies Actions and Targets (PAT) in place. This approach (like for ESRS Set 1) is designed to have a reliable depiction of what the undertaking is doing to address sustainability matters, avoiding greenwashing. At the same time, this approach only requires reporting the PAT (Policies, Actions and Targets) that the undertaking has in place. No information is required when they have no PAT in place for a material matter (in addition to the list of material matters itself).

In the VSME ED, the Narrative-PAT and Business Partners Modules require assessing the materiality of the matters, as it considers the disclosure of only material matters as essential information for users. Do you agree with this approach?

Yes

Please explain your answer.

The decisive factor here is the depth to arrive at the selection of the material matters. As indicated in other sections, guidance is required here in the form of a link between sectors and relevant topics. In the Netherlands, KPMG carried out a CSR Sector Risk Analysis in 2014 on behalf of the Dutch government. On the basis of such an analysis, a suggestion could also be made at sectoral level on material matters.

19. As a way to simplify the materiality approach, whenever possible the notion of “report only if applicable” has been introduced. This filters information to be reported by undertakings on the basis of relevance. No disclosure is expected for a specific datapoint, when the undertaking’s circumstances are different from those that would trigger disclosure of that specific datapoint, as described by the relevant provision in VSME ED. This is particularly important for the Basic Module, where no materiality analysis is foreseen and all the disclosures are to be reported, if applicable.

Disclosures in the Business Partners module are to be reported if they are applicable and for BP 5,7, 8, 9, 10 (for which the "if applicable" approach would not work) if they are relevant to the undertaking's business and organisation.

Do you agree with this approach?

No

Please explain your answer:

See our comments under 19. It is our expectation that many SMEs will choose to draw up a minimal report. This is because of the additional costs and the non-binding nature.

20. Financial opportunities have been included only on an optional basis in VSME ED since the CSRD focused on negative impact when addressing SMEs.

Do you agree?

Yes, reporting for financial opportunities should be optional

Please explain your answer:

The standard provides excellent starting points for SMEs that would like to present their sustainability performance on a voluntary basis. This also includes the expected opportunities. This allows companies that operate sustainably to gain a competitive advantage, for example in terms of attracting staff and new customers.

21. Do you agree with the proposed principles for the preparation of the sustainability report for the Narrative-PAT and Business Partners Module in VSME ED?

Principles for the preparation of the sustainability report (Narrative-PAT Module, Business Partners Module)

	Please select:		If you disagree please explain your reasoning:
	Agree	Disagree	
a) Time horizons (paragraph 40 in VSME ED)	X		
b) Coherence and linkages with disclosures in financial statements ((paragraph 41 in VSME ED)	X		

Please add your comments, if any:

The publication obligation of small enterprises is limited to a (concise) balance sheet. Therefore, the inclusion of financial information or references to it is not desirable for this group. In the case of medium-sized companies, this is more limited, as they already have to deal with broader disclosure requirements of their financial statements.

10. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

d. Narrative-Policies, Actions and Targets (PAT) Module

22. Do you agree with the content of the disclosures required by the Narrative-PAT Module of VSME ED? Please refer to Annex 2 Basis for conclusions for VSME ED for further detail. Please include your feedback in the table below:

	Do you have comments on this disclosure?
Disclosure N 1 – Strategy: business model and sustainability related initiatives	We propose that at least the NACE code should also be adhered to. After all, this is an accepted tool for the compilation of economic statistics and overviews and makes companies more identifiable.
Disclosure N 2 – Material sustainability matters	Identifying material sustainability themes requires a broader knowledge of what is meant by sustainability. The list of sustainability matters gives guidance, but is not related to specific activities.
Disclosure N 3 – Management of material sustainability matters	Especially for smaller companies, it will be quite a challenge to manage the sustainability aspects of their own activities. Because it is optional, we expect that only a few SMEs will have developed such a policy and will therefore not report on it. In order to properly monitor proportionality, it is important to keep the primary purpose of the standard in mind.
Disclosure N 4 – Key stakeholders	A large proportion of SMEs are very small. The dialogue with stakeholders, such as customers, suppliers and employees, takes place through personal contacts via the spoken word. The question is how a brief description of the engagement activities adds to the information needs of the users of the sustainability reporting.
Disclosure N 5 – Governance: responsibilities in relation to sustainability matters	Again, careful consideration must be given to the value of this disclosure. If it is desirable, provide clear guidance.

23. N3 requires the disclosure of policies, actions and targets to manage material sustainability matters. There are other schemes used by SMEs requiring reporting of similar information, such as the European Eco-Management and Audit Scheme (EMAS – Regulation (EC) No. 1221/2009) regarding environmental policies, actions and targets.

Do you see any potential for better alignment with those other reporting schemes?

No

Please explain your answer:

11. QUESTIONS

B) PART 2: Detailed questions on principles and datapoints (ADDITIONAL, to complement part 1)

e. Business Partners (BP) Module

24. While acknowledging the complexities of this calculation specifically for SMEs, the inclusion of greenhouse gas (GHG) Scope 3 emissions as the entity-specific dimension was considered an important element of disclosure in some sectors. The Business Partners Module includes an entity specific consideration for GHG Scope 3 emissions to guide undertakings in certain sectors and for which Scope 3 GHG emissions are material in addition to the disclosures envisaged in B3 Energy and GHG emissions (Basic Module).

Do you agree with the inclusion of GHG Scope 3 emissions in the Business Partner Module in the paragraph “*Entity specific consideration when reporting on GHG emissions under B3 (Basic Module)*”?

Yes

Please explain your answer:

As stated in the opening words of the question, scope 3 emissions are more important for specific sectors. A valuable addition could therefore be to name these sectors as guidance for the preparers.

25. Do you agree with the content of disclosures required by the Business Partners (BP) Module of VSME ED? Please note that you can find the background for each Disclosure in the Annex 2 Basis for conclusions for VSME ED (BC130. to BC149). Please include your feedback in the table below:

	Comment:
Disclosure BP 1 – Revenues from certain sectors	Agree
Disclosure BP 2 – Gender diversity ratio in governance body	Agree
Disclosure BP 3 – GHG emissions reduction target	Agree
Disclosure BP 4 – Transition plan for climate change mitigation	Agree
Disclosure BP 5 –Physical Risks from climate change	This disclosure requires extensive knowledge in order to be able to properly assess these risks. In order to be able to give a substantiated interpretation to this, most SME entrepreneurs will have to call on external expertise at high costs.
Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio	Agree
Disclosure BP 7 – Alignment with internationally recognized instruments	In general, SMEs will not have knowledge of these international instruments. However, many of the aspects of this have been translated into national legislation and are enforced by the national government. In our opinion, it would be better to refer to these regulations that SMEs have to comply with.
Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations	See also the reply under BP 8. Many aspects are covered by the laws and regulations of the national Member States. For SMEs, a reference to this seems more appropriate.
Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO Declaration and the International Bill of Human Rights)	See the answers under BP 7 & BP 8.
Disclosure BP 10 – Work-life balance	Agree
Disclosure BP 11 – Number of apprentices	Agree

26. With reference to disclosures BP 7, BP 8 and BP 9, the objective of these three disclosures is to assess the SME's commitment to respecting human rights. The ED has used the terms in the Sustainable Finance Disclosures Regulation (SFDR), applicable to the financial market participants (for example banks), for consistency purposes.

Are there alternative disclosures covering the same objective regarding the human rights of own workforce and that are more suitable than these disclosures?

Yes

Please explain your answer including updated/proposed text:

Many of the aspects of these aspects have been translated into national legislation and are enforced by the national government. Therefore it would be better to refer to these regulations that SMEs have to comply with. For reasons of proportionality, we believe that existing commitment requirements and justifications should be followed as much as possible, minimising the additional administrative burden.

27. Do you think that it would be beneficial to split the Business Partners (BP) Module into sub-modules depending on the nature of the user (for example “banks”, “investors”, “large corporates”)?

Please select:

Yes

Please explain your answer:

This makes it clear which information request is important for which party. The maximum request from a user will preferably have to be determined by law and tested for necessity.

28. Some of the questionnaires of banks and other business partners analysed by EFRAG Secretariat included also datapoints related to the EU-taxonomy regulation, despite non-listed SMEs being out of scope. EFRAG considered that preparing this information would be too complex for non-listed SMEs. We note that the EU Platform for Sustainable Finance may in the future make a proportionate tool for EU-taxonomy available. In particular, to meet the technical criteria for inclusion in the climate mitigation taxonomy, large undertakings have to consider the greenhouse gas (GHG) emissions of their various economic activities. These undertakings will need data from their suppliers. Small and medium-sized enterprises (SMEs) playing a crucial role in these undertakings' supply chains may be asked to provide the following information voluntarily to streamline the process for themselves and their clients:

SMEs whose activities fall under enabling activities of the Climate Delegated Act, e.g., categories 3.6 (Manufacture of renewable energy technologies) or 9.1 (Market research, development and innovation), should disclose the emission savings of their technology compared to the best-performing alternative.

Do you think that VSME ED should include this additional datapoint to cover EU-Taxonomy disclosures?

Yes

Please explain your answer:

This will enable SMEs to make their important role in the energy transition more clear, on the condition that there is indeed a proportional instrument available for SMEs.

29. In order to help SMEs prepare their sustainability report, specific guidance has been developed for the Business Partners Module in paragraphs 169 to 193 of the ED.

Do you think that it is useful in the preparation of the sustainability report? Do you think it is sufficient?

Yes

Please explain your answer:

In general, the question should be asked to what extent SMEs will be able to independently draw up a sustainability report based on the current draft standard.

30. Please provide any further comments not addressed in part 1 or 2 of the questionnaire here:

31. If you want to provide additional comments on aspects not covered in the questionnaire, please upload your file here.

12. C: Part 3: Value chain cap (Separate section on the value chain cap as determined by the ESRS LSME)

Non-listed SMEs receive data requests from large undertakings, including due to reporting obligations in the CSRD.

Jointly with the consultation on VSME ED to the consultation on this voluntary standard for non-listed SMEs, EFRAG is also consulting on the content of ESRS for listed SMEs (ESRS LSME ED). While ESRS cannot result in large undertakings having to request disclosures that are not included in ESRS LSME ED (which sets the value chain cap from a legal perspective), the VSME ED is intended to play a key role in supporting SMEs, when they prepare the information needed by large undertakings for ESRS reporting, as well as for other obligations including for business purposes. Therefore, VSME ED includes simplified disclosures that generally correspond to the reasonable expectations of ESRS Set 1 preparers (i.e. large undertakings that prepare their sustainability statement under ESRS). As a consequence, non-listed SMEs that apply VSME ED will in general be able to meet the data requests defined for value chain in ESRS LSME ED, except for very specific cases. These cases correspond to disclosures which are included in ESRS LSME ED (therefore SMEs may receive data requests from large undertakings relating to these disclosures, either due to their ESRS reporting obligations or for other obligations and business purposes), but are not included in the VSME ED, due to their excessive complexity for non-listed SMEs in general. They are principally of a sectorial nature (GHG Removals, substances of concern/high concern, resource inflows), mainly needed for management or specific arrangement purposes. More information is provided on these disclosures in [Annex 3](#).

Please note that the questions on the value chain cap here are the same as in the LSME questionnaire in part A2 and if you respond to both questionnaires, you do not need to repeat your answers.

32. Do you agree with the approach EFRAG has taken on the Value Chain Cap?

Yes

33. Please explain your answer, in brief:

SRA is a strong proponent of a value chain cap in the value chain. We argue for a sector-specific set of criteria on the basis of which SMEs should provide chain partners with data.

34. Please provide other comments on the value chain cap, if any.

An SME test should be applied based on the following elements; proportionality, enforceability, uniformity. Proportionality, don't ask for more than is needed. Enforceability, align as much as possible with information already available. Uniformity, provide guidance and clear definitions, so that information remains unambiguous and mutually comparable. If these conditions are met, the administrative burden will be limited and it will be easier for SMEs to make sustainability data available.

13. Thank You!

Thank you for taking our survey. Your response is very important to us.