



Key sustainability
updates: CSRD,
EU Taxonomy, CS3D



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Omnibus package: simplifying EU sustainability

February 2025 proposal:

- cuts red tape
- aligns CSRD, Taxonomy, CS3D
- reduces in scope firms by 70-90%.

June Council agreement re further simplification

July quick-fix delegated acts re ease of reporting burden

October Parliament compromise – major simplification

Trilogues start October 24, to be completed by December 2025/January 2026



Key Omnibus changes

Metric	Directive	Before Omnibus	After Omnibus (Oct 2025)
Employee Threshold	CSRD	>250	>1,000
	CS3D	>1,000	>5,000
Turnover Threshold (€M)	CSRD	>40	>450
	CS3D	>450	>1,500
Affected Companies (EU)	CSRD	~50,000	~5,000
	CS3D	~6,900	~2,070
Timeline (first reporting/application)	CSRD	2024 FY (2025)	2024 FY (2025, waves 2/3 delayed to 2026/2028)
	CS3D	Transposition 2026, apply 2027	Transposition 2027, apply 2028

CSRD: streamlined reporting

Recap: ESRS-based reporting (2024 FY due 2025).

Omnibus:

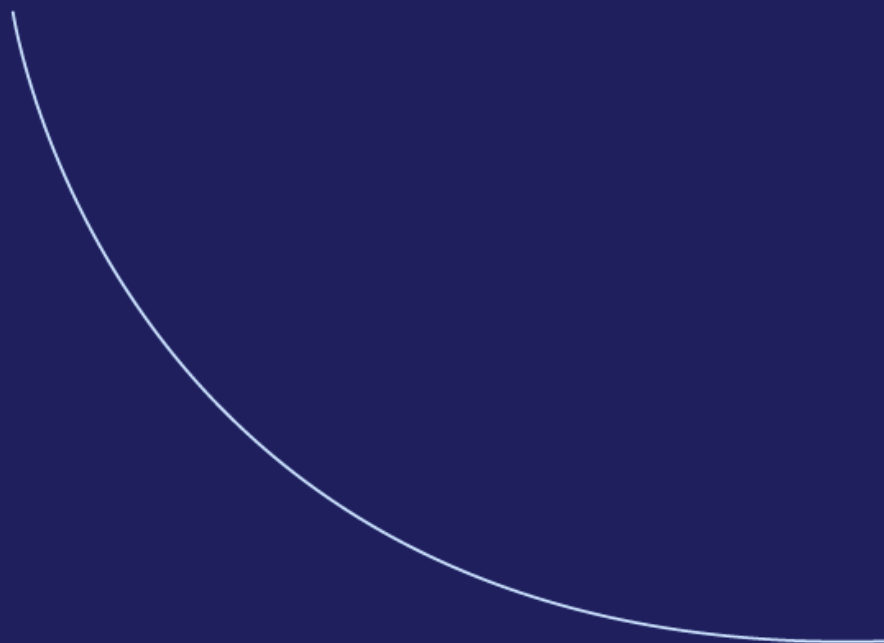
- thresholds (> 1,000 emp, > EUR 450million turn),
- voluntary sector ESRS, VSME for SMEs,
- delays (wave 2/3 to 2026/2028).

Post-June: July 11 quick-fix (flexible datapoints)

October: quantitative focus, review clause.



EU Taxonomy: simplified classification



Recap: classifies sustainable activities (contribution, no harm, safeguards).

Omnibus: aligns scope, voluntary for non-covered firms.

Post-June:

- simplifies “no significant harm” criterion
- allows partial alignment,
- reduces data requirements for capital and operational expenditures
- effective 2026 (optional delay to 2027).

October: no major changes, reinforces voluntary approach.

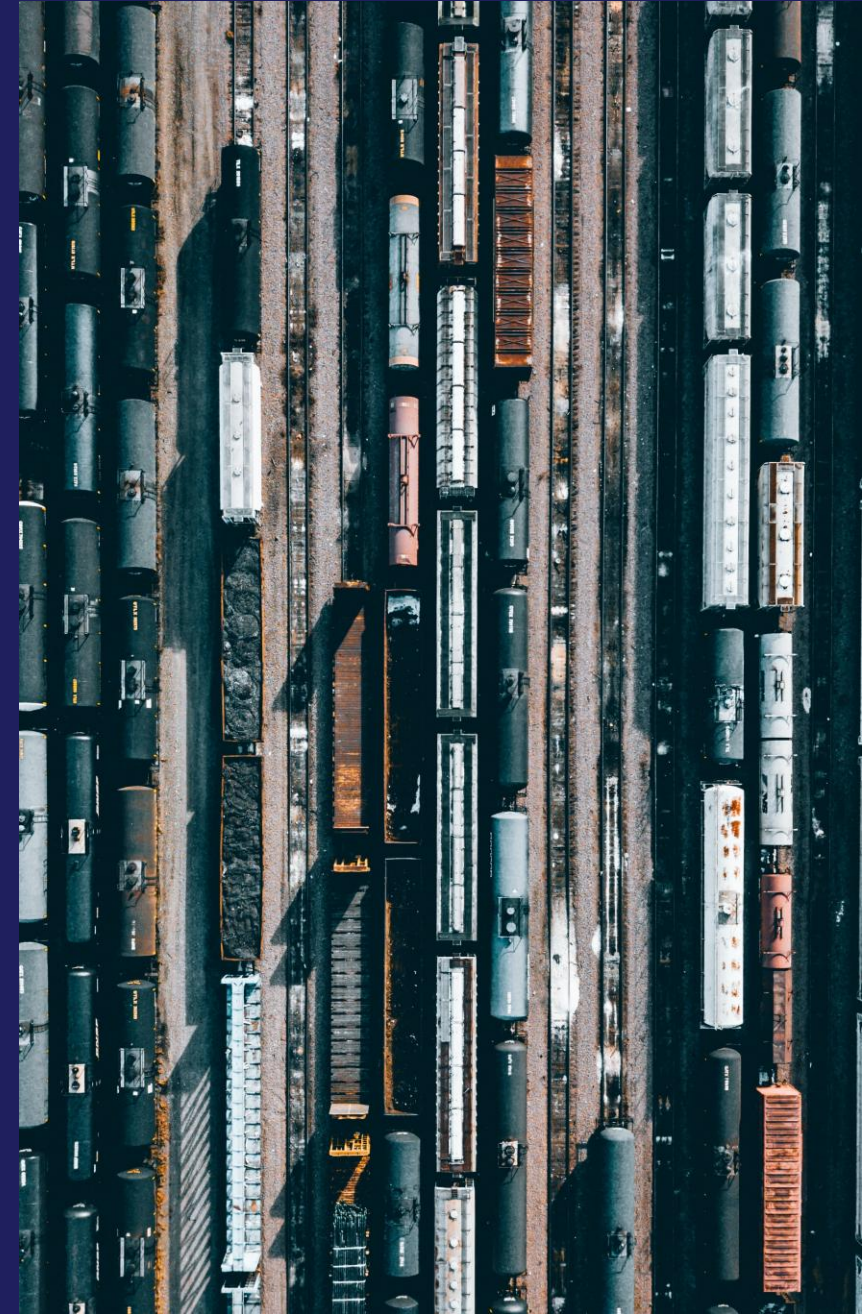
CS3D: risk-based due diligence

Recap: due diligence on environmental & human rights impacts, transition plans.

Omnibus:

- Thresholds: > 5,000 emp, > EUR 1.5 billion turnover (EU); > EUR1.5 billion EU turnover (non-EU)
- Risk-based: focus on tier-1 partners; indirect only if credible risks
- No EU civil liability; fines capped at 5% turnover
- Delays: transposition July 2027, application 2028

October compromise adds stricter information gap rules, softens transition plans





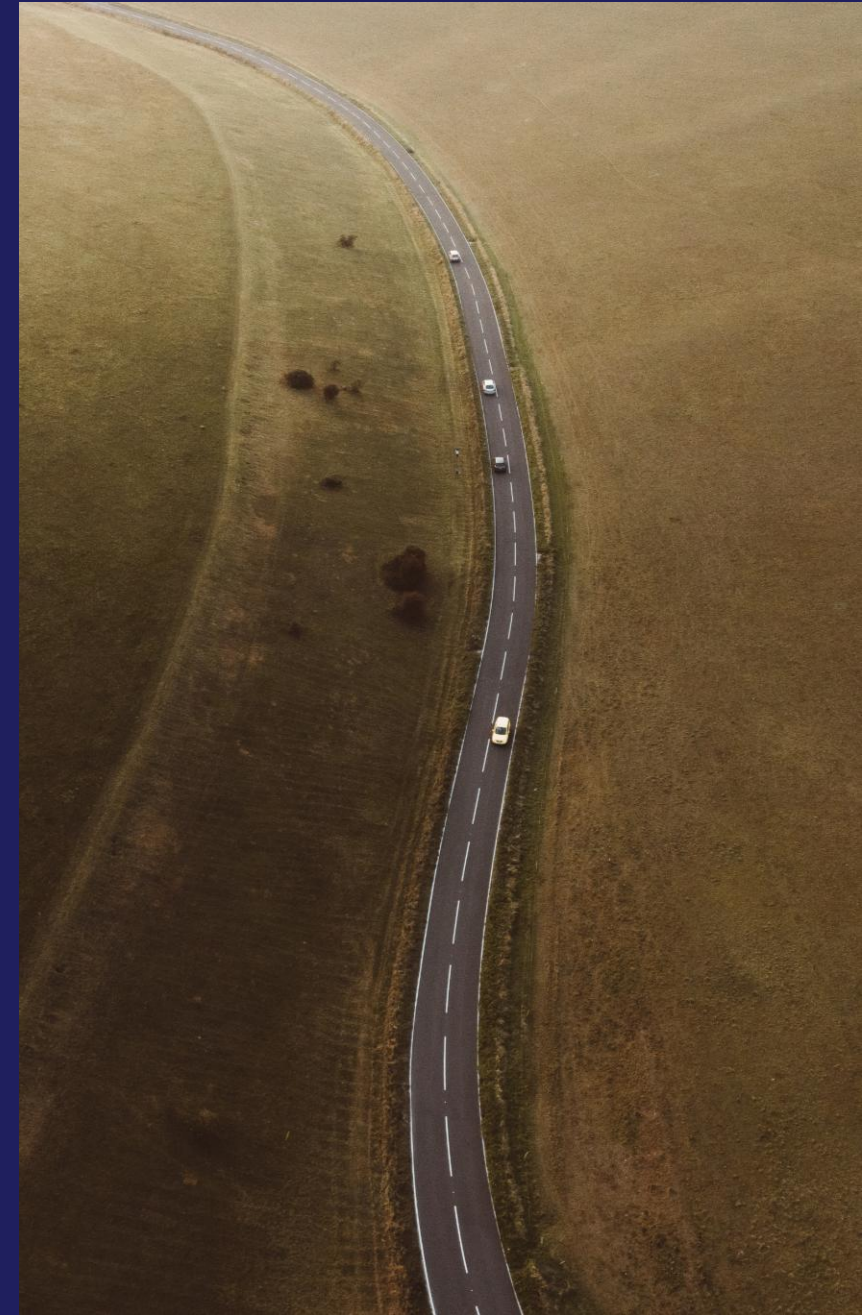
Interconnections and business impacts

- Interlinks: CS3D informs CSRD reports; Taxonomy aligns classifications
- Omnibus cuts affected firms by 70-90%, harmonises thresholds
- Opportunities: green finance, risk management, innovation
- Challenges: value chain mapping, system updates (eased by digital portal)
- Non-EU firms with EU turnover are still affected

Key takeaways & next steps

- Omnibus (Feb 2025) and post-June updates streamline frameworks
- Key changes: higher thresholds, voluntary standards, risk-based focus
- Monitor trilogues (Dec 2025/Jan 2026) for final text

Next steps: assess scope, use digital portal, prepare for 2026/2028



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