

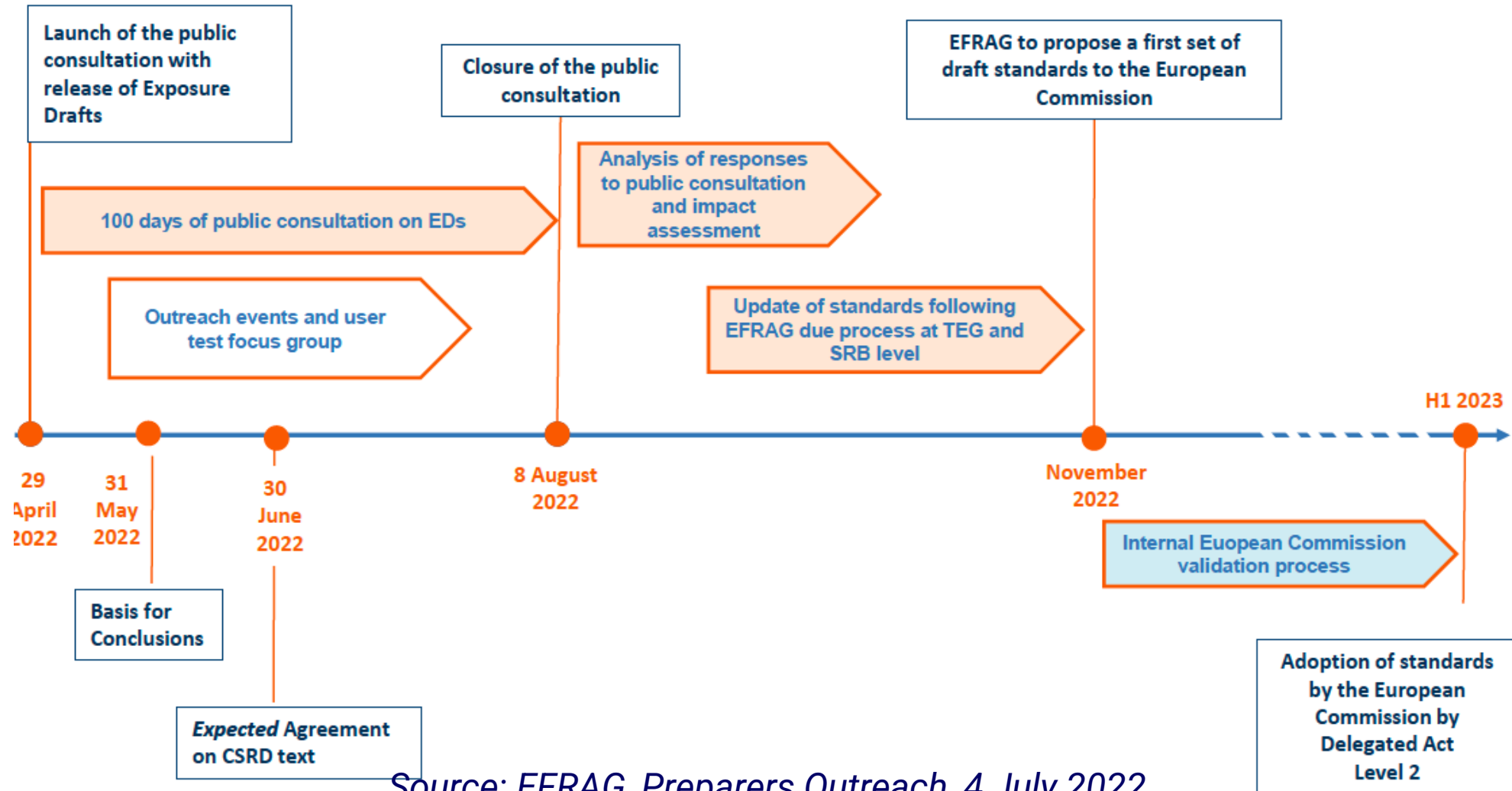
# **Analysis of the Comment Letters on Exposure Drafts European Sustainability Reporting Standards (ESRS)**

## **Osservatorio Diligentia sugli standard di Sustainability Reporting**

Prof. Marco Allegrini (Università di Pisa)

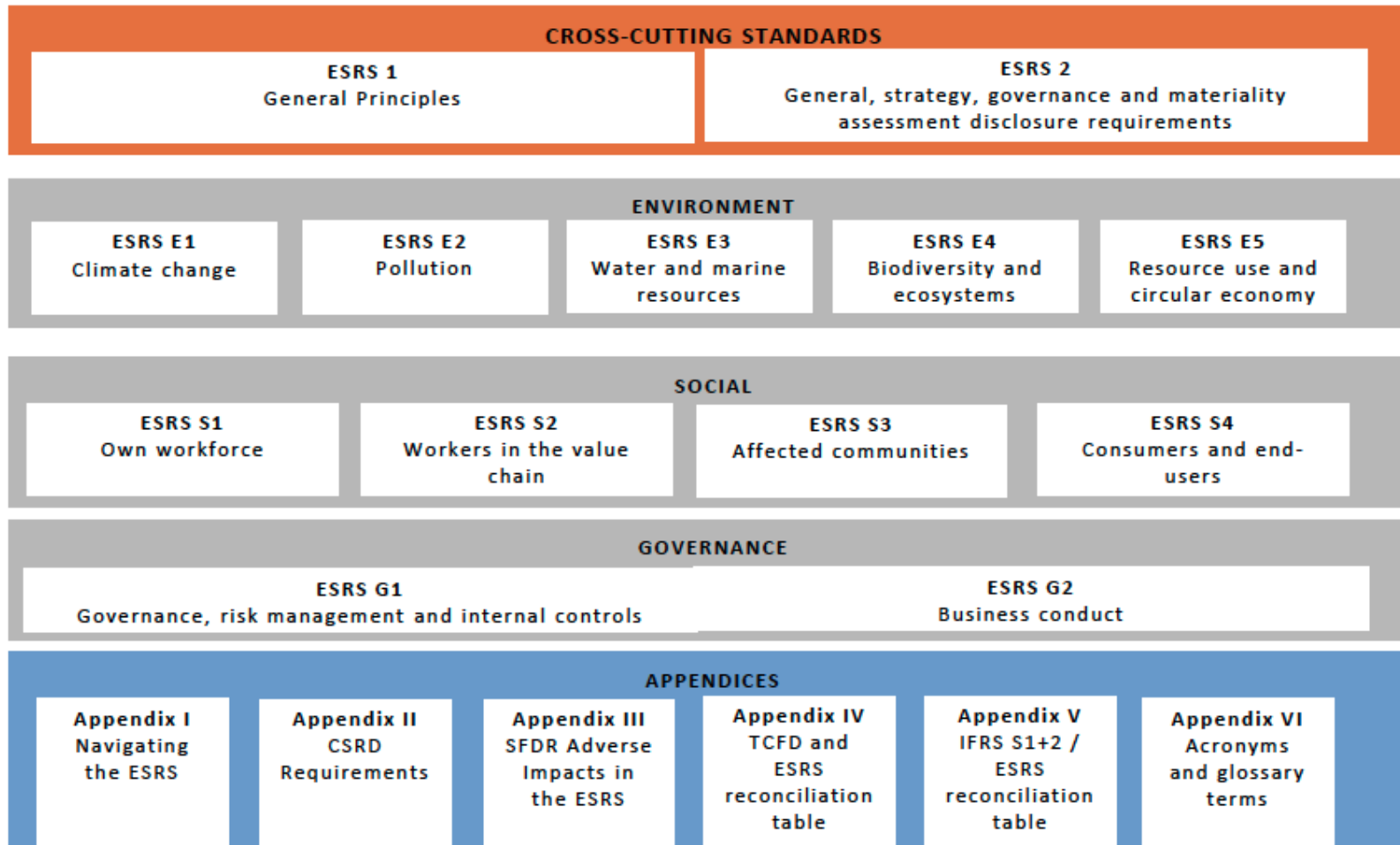
<https://diligentia.it>

# ESRS: from Eds to Draft standards



Source: EFRAG, Preparers Outreach, 4 July 2022

# ESRS Exposure Draft Standards



# Obiettivi Osservatorio Diligentia sugli standard di Sustainability Reporting

- Costituire e sviluppare un osservatorio sull'evoluzione e diffusione degli standard internazionali di Corporate Sustainability Reporting aperto alla partecipazione di Enti, Associazioni, accademici imprese e professionisti

ORIZZONTE	DESCRIZIONE
<b>Lungo termine</b>	<ul style="list-style-type: none"><li>• Seguire lo sviluppo e l'evoluzione degli standard di sostenibilità e della loro applicazione</li><li>• Promuovere la corretta applicazione di tali standard</li></ul>
<b>Breve termine</b>	<ul style="list-style-type: none"><li>• Raccogliere e coordinare le proposte dei soci di Diligentia tenendo conto dell'ampia gamma di enti e istituzioni rappresentati</li><li>• veicolare a ISSB ed EFRAG, entro le scadenze previste, i commenti sulle bozze di standard di "sustainability reporting" attualmente in consultazione pubblica</li></ul>

# Comment letters on ESRS EDs published by EFRAG

1. Draft ESRS EDs - Comment letters uploaded to online survey

<https://efrag.sharefile.com/share/view/sa1b36fe9c4894612a791b1c03fe350df/fob6a1ba-4237-4c96-baf6-baa166d0f8b6>

2. Draft ESRS EDs - Additional comment letters received by EFRAG for public consultation

<https://efrag.sharefile.com/share/view/s8801772d654349cd87d12ce7ef90fb71/fo8ee61f-d3a3-4463-8629-a524256322e9>

3. Draft ESRS EDs - Comment letters received by EFRAG after the consultation deadline

<https://efrag.sharefile.com/share/view/s5eb9d9a7b7fe421aa63ece6f4ee92d40/fo48b9ef-7151-4f7f-b318-7b9d71e0ebd1>

# Diligentia ETS analysis of some comment letters sent to EFRAG on ED ESRs

ANDAF-NED  
COMMUNITY -  
AIAF

ASSIREVI

ASSONIME

DILIGENTIA  
ETS

ESMA

OIC

OIBR

# Convergence (1)

## CSRD

- «To avoid unnecessary regulatory fragmentation that may have negative consequences for undertakings operating globally, European standards should contribute to the process of **convergence of sustainability reporting standards at global level**, by supporting the work of the International Sustainability Standards Board (ISSB). European standards should reduce the risk of inconsistent reporting requirements on undertakings that operate globally by integrating the content of global baseline standards to be developed by the ISSB, to the extent that the content of the ISSB baseline standards is consistent with the EU's legal framework and the objectives of the European Green Deal».

## Convergence (2)

### DILIGENTIA

- «There are currently many standards dealing with ESG reporting: GRI, SASB, integrated reporting framework, etc.; ESRS and IFRS Sustainability Disclosure Standards are going as well to regulate ESG reporting in the near future. A convergence process is needed, to avoid some comparability shortfalls and administrative costs for those companies operating in different geographical areas, both in European and in non-European countries: **it would be costly and inefficient to produce many ESG reports drawn according to different standard, for instance ESRS in Europe and IFRS S in other parts of the world**».

### OIC

- «in addition to the **issue of double materiality which however characterizes the European approach, a misalignment regarding other critical profiles such as, for example, rebuttable presumption, cross-references**, definition of financial materiality, definition of time horizons, presentation of predefined intermediate targets, the information along the value chain for which the IFRS allows the entity, with regard to scope 3, to omit it in the absence of faithful measure while EFRAG in those circumstances requires anyway for an approximation» . We strongly recommend EFRAG and IFRS to closely **work together** forthwith to ensure the **coordination and integration** between these standard-setting initiatives must be absolutely pursued»



## Convergence (3)

### ASSONIME:

- «(...) we strongly encourage **EFRAG and ISSB to continue to work together** to ensure that enterprises with a global presence are not required to prepare multiple sets of reports. Preparing multiple sustainability reports is time consuming and costly for EU companies, and of little benefit to investors and other relevant stakeholders, because it reduces the comparability of information. In this context, we support the collaboration that has already been established through the ISSB Jurisdictional Working Group»

### ASSIREVI:

- «more time seems to be needed for an adequate and meaningful dialogue between EFRAG, the ISSB and other regulatory and standard-setting bodies, which is necessary to enable global convergence and interoperability to the maximum extent possible».

## Convergence (4)

### OIBR:

- «We think that ESRS financial and information materiality needs to be **consistent** with ISSB/IFRS definitions in order to reconcile back to financial statements and enable a consistent measure of investor-focused “material information/financial effects”. In order to do so, EFRAG should ask for a subset of financially material information (i.e., information that is material per the ISSB S1) to be clearly identified in the management report (e.g., through a table)»

### ESMA:

- «The ESRS should, to the greatest extent possible and taking account of the EU sustainability requirements and objectives, promote **interoperability with relevant international standards**»

## Reporting boundaries and value chain (1)

ESRS 1, par. 63: «*The undertaking's reporting boundary for its sustainability reporting is the one retained for its financial statements expanded **to its upstream and downstream value chain**. Associates and joint ventures accounted for under the equity method are considered as part of the upstream or downstream value chain. Entities accounted for under the proportional consolidation method are considered as part of the boundary for the consolidated portion*»

## Reporting boundaries and value chain (2)

### DILIGENTIA

- « It seems rather unrealistic, and probably even misleading, to ask for forecast data from other organizations (belonging to the same value chain)»

### OIC:

- «EFRAG should consider in the review of the standard if the application of value chain concept would lead to excessive burden. It suggests applying the **proportional approach** required by the CSRD final version: *“standards shall also take into account of the difficulties that undertaking may encounter in gathering information from actors throughout their value chain, especially from those that”* (art. 29b, par. 2b CSRD) »

## Reporting boundaries and value chain (3)

### **OIBR**

- «The costs to collect and disclose such information are high and benefits could be limited because the company has not a direct control over such data and information. The lack of direct control and the difficulty in obtaining such information also could negatively influence the **assurance** of sustainability disclosures. In addition, the definition of the value chain is too vague and requires further specifications in the Exposure Drafts. We suggest thinking at least about a limitation of this requirement at the **first level upstream and downstream of the value chain**»

### **ASSIREVI**

- «The overall reporting boundary should therefore be more properly **aligned with the perimeter of preparation of the consolidated financial statements**. Just selected disclosure requirements might be extended to the entire value chain, providing an appropriately flexible phasing-in process»

# Value chain

## DILIGENTIA

- «Diligentia agrees with the extension of the boundaries of ESG reporting from the legal entity to the value chain.
- However, it seems rather unrealistic, and probably even misleading, to ask for forecast data, approximate data, or data from other organizations (belonging to the same value chain) when no own data is available.
- Diligentia suggests applying the proportional approach required by the CSRD final version: *“standards shall also take into account of the difficulties that undertaking may encounter in gathering information from actors throughout their value chain, especially from those that”* (art. 29b, par. 2b CSRD)».

# Value chain

## ASSONIME

- «The companies in the value chain to be considered should ***only*** be those that have a **relevant and established relationship over time** with the company preparing the Sustainability Report, whose information must be considered based on a materiality analysis to understand the impacts, risks, opportunities of the company».
- «Moreover, information on the value chain, by its very nature, is not directly available to companies that may encounter difficulties even where collaborative arrangements are in place (think of the case of companies using a dense network of small to medium-sized suppliers). Where this information is not available, company should be allowed to omit it, since the information produced risks not to meet the quality criteria requested by the directive».

# Overlapping between different ESRS

## **DILIGENTIA**

- The overall structure seems very complex, with repetitions amongst different standards.

## **ESMA**

- We recommend that EFRAG considers improving the interplay between cross-cutting and topical requirements



## Rebuttable presumption (1)

**ESRS 1 par. 57:** *«all mandatory disclosure requirements established by ESRS shall be **presumed** to be material and, therefore, justify a full disclosure in accordance with the relevant ESRS (...) such a presumption is **rebuttable based on reasonable and supportable evidence**»*

### **DILIGENTIA**

«The burden to apply to so-called rebuttable presumption could be significant. It could create an incentive for companies to provide all the information required by the standards, even if they are not material, with the risk of not giving priority to relevant information»

### **ESMA**

«ESMA does not support the proposed rebuttable presumption which we believe provides counterproductive and sometimes even conflicting incentives which may **decrease the disclosure quality**»

## Rebuttable presumption (2)

### OIBR

- A disadvantage of the rebuttable presumption is that it could turn the preparation of the sustainability report into a **mere checklist process**. Entities could completely rely on the topical standards and **avoid conducting the materiality assessment**, thus giving an incomplete picture of their sustainability impacts, risk and opportunities. The materiality assessment could become a process aimed at identifying the “non-material” sustainability information instead of the “material” ones

### OIC

- Also considering the burden of applying the rebuttable presumption, companies could choose to provide **all** the information required by the standards, **even if not material**, with the **risk of obscuring significant aspects**

### ASSONIME

- This approach – the rebuttable presumption of materiality – seems **at odds with the very nature of materiality analysis** and is not consistent with the directive

# All mandatory disclosures (1)

## **DILIGENTIA:**

- It suggest to distinguish the disclosure requirements in two categories: **mandatory and optional**.
- Many of the information currently required as optional, for example by the GRI, are proposed as mandatory by the EFRAG standards.
- Therefore, Diligentia recommends limiting the mandatory disclosure only to the key information and make the others optional.

## **ASSIREVI:**

«We therefore recommend EFRAG to revisit the disclosures required, by both (i) prioritizing a **limited list of decision-useful information and information required by the EU regulatory framework**, and (ii) **introducing transitional and phasing-in provisions for the remaining disclosures** that need more time to be implemented. Moreover, EFRAG should also evaluate whether certain disclosure requirements can be more properly moved to sector specific standards».

## All mandatory disclosures (2)

### OIC

«we recommend in this first phase, to limit the mandatory disclosure only to the key information and make the others optional or to provide an adequate phase-in such as to allow the standard setter to consider those requirements in conjunction with the development of the industry standards and the companies to have the time to implement them»

### ASSONIME

« There is a need to make the application of the EFRAG standards more flexible in two respects:

- revising some mandatory information requirements, giving them the different nature of **recommendations**;
- introducing a general clause allowing the **omission** of certain mandatory disclosures or a lower granularity of information when there is reasonable justification»

In addition, it seems reasonable to introduce a graduation of requests:

- those that are **mandatory** (subject to rebuttal of materiality);
- those that are **suggested**;
- those with **illustrative value** (in the application guidelines)

# Double materiality

- ESRS: «*Double materiality is the union (in mathematical terms, i.e., union of two sets, not intersection) of impact materiality and financial materiality. A sustainability matter meets therefore the criteria of double materiality if it is material from either the impact perspective or the financial perspective or both perspectives*»

# Double materiality (1)

## DILIGENTIA

- Diligentia proposes to adopt the definition of “impact materiality” given in the GRI standards.

## ESMA

- it is important that EFRAG provides **adequate guidance** to issuers on how to implement the materiality process, including how to determine any entity specific qualitative and quantitative materiality criteria and how to distinguish between impact materiality and financial or enterprise value creation materiality

## OIC

- it is necessary to establish whether the driver to assess the materiality of an impact is the relevance for the stakeholder or the relevance for the company.
- Financial materiality, whether it refers to phenomena captured in the financial statements or to longer-term phenomena that do not meet the criteria to be recognized in the financial statements at the reporting date, should be assessed **according to the investor's perspective** as defined by the international accounting standards and by the Accounting Directive
- unlike the climate standard, which indicates the specific indicators to be disclosed, in the other environmental standards (pollution, water and marine resources, biodiversity and ecosystems and circular economy) the **financial indicators are not defined** and any application guidance is provided.

## Double materiality (2)

### OIBR

- How should entities treat sustainability information that is material from both perspectives?
- EFRAG should provide **additional step-by-step guidance** on how to implement the concept of double materiality, specifying the logical process to be followed and providing practical examples
- Impact materiality: Although the proposed definition of impact materiality is clear and quite aligned with that of international standards (see response to Q20), the concrete determination and implementation present many challenges. In this regard, **ESRS 1 gives little guidance on how to implement the concept**. It requires considering the severity (scale, scope, and irremediability), without explaining the meaning of the terms and thus incrementing the difficulties faced by entities when conducting the materiality assessment. Moreover, further guidance should be given on how to distinguish between “material” and “non-material” sustainability information, also providing examples of “thresholds” or “criteria” to use.
- We think that ESRS financial and information materiality needs to be consistent with ISSB/IFRS definitions in order to reconcile back to financial statements and enable a consistent measure of investor-focused “material information/financial effects”.

## Double materiality (3)

### ASSIREVI

- **illustrative guidance** is needed to explain how the double materiality, impact materiality and financial materiality assessment process shall be carried out. For instance, the preparation and use of a materiality matrix could be helpful. It is also critical to clarify the practical **connections between the impact materiality and financial materiality assessment**
- **ASSONIME**
  - describe in more detail the **criteria** to be followed in the materiality analysis process, **following the GRI** (GRI 3 Material topics, version 2021);
  - making it clear that materiality assessment is a process to be run at the level of general topic (e.g., climate change, occupational safety) rather than at the level of individual impacts or information requirements



# Financial effects

## DILIGENTIA

- Diligentia recommends to define “enterprise value” as it has been defined by the International Sustainability Standards Board (ISSB) in its draft IFRS S1

## ASSIREVI

- The estimation of the potential financial effects on future financial position, performance and cash flows arising from sustainability impacts, risks and opportunities implies **a high degree of uncertainty and judgement**
- More practical guidance about monetary amounts and other financial statement-related quantitative data is needed, as well as a flexible phasing-in provision for a transitional period for such critical disclosures

## ASSONIME

- In environmental standards, it is required to determine the possible financial effects on the company's performance in the short, medium, and long term
- At present, there are no reliable and established processes in place to construct this data.

# Financial planning

## ASSONIME

- the difficulty of prefiguring long-term future scenarios based on reasonable and scientifically sound assumptions.
- the **consistency of sustainability prospective information with the common practice of time planning in the financial sector**, which usually has a shorter time frame. There is a risk of two separate planning processes.
- The request for forward-looking information should be and shaped according to type of forward-looking information to be provided.
- It also should be aligned with the practice of financial planning, with the option for companies to indicate targets with a longer time horizon

# Connectivity and presentation

## DILIGENTIA

- Only the option a) in ESRS 1 paragraph 1.1.6 (“**single separately identifiable section of the management report**”) is feasible with the new version of the CRSD. Options b) or c) could be sub-criteria to be applied within the separately identification section of the management report.
- In financial reporting, it is common practice to provide disclosure on the operating segments (See IFRS 8). Diligentia suggests, in order to increase the connectivity between financial reporting and sustainability reporting, to require some information about the “operating segments”.

## OIBR

- A closer connectivity between sustainability information and financial statements quantitative data is expected. **Integrated Reporting** is the model to follow to the extent possible.

## ASSONIME

- the possibility of **cross-referencing** to other documents should not be limited only to other sections of the management report but should apply also to all other information documents published by the company that are made freely available to the public free of charge. (corporate governance report, etc.)

# Time horizon of retrospective information

- **ASSONIME**

- The standards require that retrospective information be provided at least for the year preceding the year of reporting, as is the case for financial reporting.
- The guidelines might recommend commenting on the year's data with respect to the **two years preceding it**

# Detailed suggestions for single disclosure requirements

- **Diligentia** raised lots of analytical suggestions

# ANDAF, AIAF, NED COMMUNITY: a Sustainable Approach

1. A comparable and measurable **set of indicators** able to accompany qualitative information with the necessary quantitative data
2. A simplified sustainable approach, applicable by **all companies**, especially by **SMEs**, which will be directly and indirectly, even if with a different timing, be affected by these standards
3. An appropriate consideration of the **costs** of sustainability and of the relevance of economic financial objectives of a company in relation to the ESG factors.
4. An identifiable **set of methodologies**, to form the basis of a sustainable development process that will guide companies through a green evolution of their business

## ANDAF, AIAF, NED COMMUNITY: a Sustainable Approach

- ANDAF, AIAF, NED COMMUNITY elaborated a **grid** connecting different reporting frameworks, mainly useful in the first reporting period.

### *Metrics:*

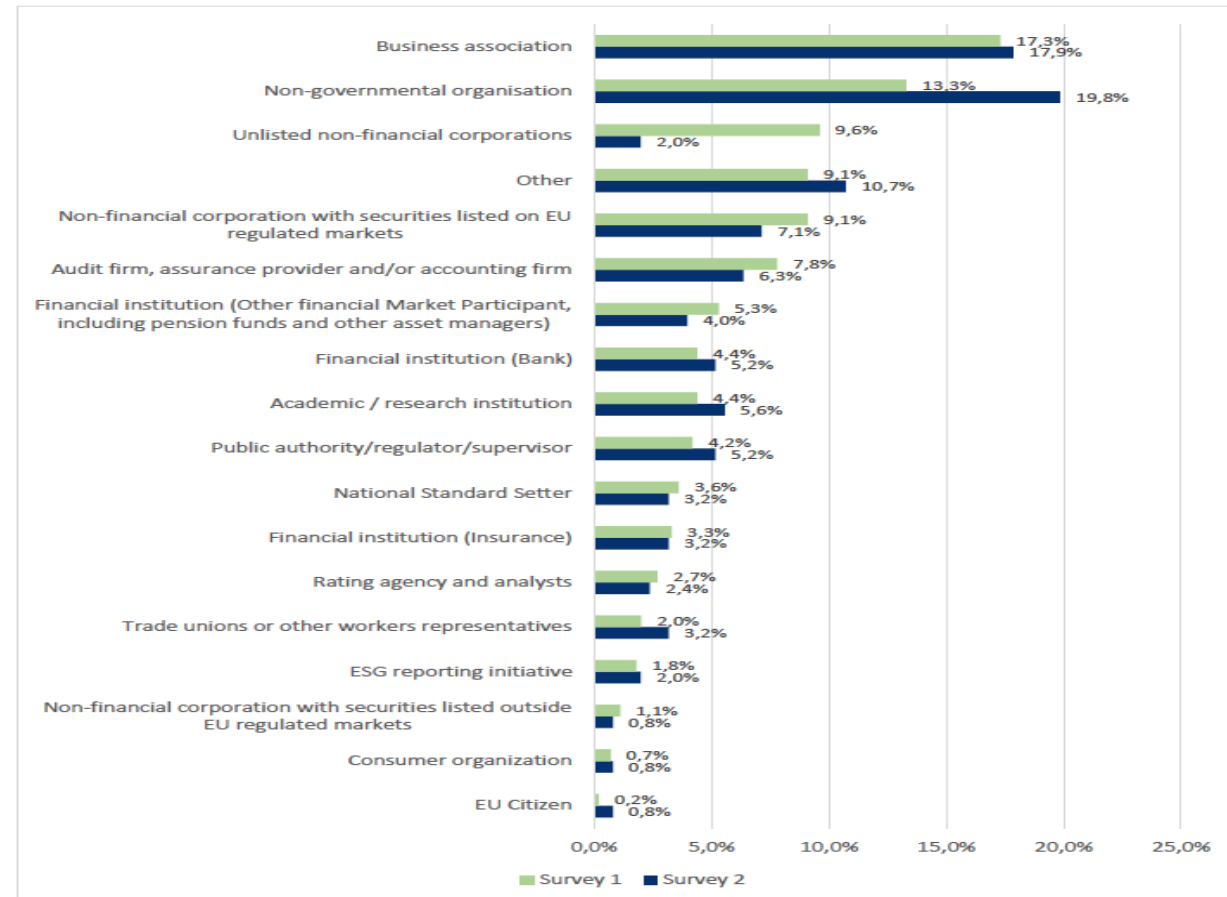
- **core**, that is more relevant,
- **expanded**, that is more advanced and that companies can insert in their reports over time

# Efrag: Quantitative and qualitative analysis of the input from the public consultation

<https://efrag.sharefile.com/share/view/se829adbc59c34daa90ea016bf60f916a/fodad0b8-a204-42db-ad5f-2aa970c4fac3>

- 450 responses to Survey 1 and 252 responses to Survey 2

Figure 1. Type of respondent



Note: Survey 1 N=450; Survey 2 N=252



Table 1. Country of origin

Country of origin	Survey 1		Survey 2	
	Count	%	Count	%
Australia	0	0%	1	0.4%
Austria	7	1.6%	6	2.4%
Belgium	57	12.7%	37	14.7%
Brazil	2	0.4%	1	0.4%
Canada	3	0.7%	0	0%
Croatia	1	0.2%	0	0%
Czech Republic	6	1.3%	0	0%
Denmark	10	2.2%	3	1.2%
Estonia	1	0.2%	0	0%
EU	5	1.1%	3	1.2%
Finland	6	1.3%	4	1.6%
France	67	14.9%	41	16.3%
Germany	136	30.2%	71	28.2%
Global	2	0.4%	2	0.8%
India	1	0.2%	1	0.4%
Ireland	3	0.7%	2	0.8%
Italy	22	4.9%	18	7.1%
Japan	1	0.2%	0	0%
Luxembourg	2	0.4%	1	0.4%
Malta	1	0.2%	1	0.4%
Netherlands	21	4.7%	16	6.3%
Nigeria	1	0.2%	0	0%
Norway	4	0.9%	1	0.4%
Poland	7	1.6%	2	0.8%
Portugal	1	0.2%	1	0.4%
Romania	3	0.7%	2	0.8%
Spain	24	5.3%	14	5.6%
Sweden	6	1.3%	2	0.8%
Switzerland	5	1.1%	0	0%
UK	26	5.8%	13	5.2%
Ukraine	1	0.2%	0	0%
USA	17	3.8%	9	3.6%
<b>Total</b>	<b>450</b>	<b>100%</b>	<b>252</b>	<b>100%</b>

Source:

<https://efrag.sharefile.com/share/view/se829adbc59c34daa90ea016bf60f916a/fodad0b8-a204-42db-ad5f-2aa970c4fac3>

# Efrag: Analysis of recurring observations

<https://efrag.sharefile.com/share/view/se829adbc59c34daa90ea016bf60f916a/fodad0b8-a204-42db-ad5f-2aa970c4fac3>

- Alignment with the ISSB and other international standards
- Double materiality approach
- Granularity of disclosure requirements
- Rebuttable presumption
- Definition of stakeholders too broad
- Assurance of information
- Increased burden for business entities
- Definition of *value chain*
- Reporting commercially sensitive data
- Availability and quality of information
- Usability of information

## **Efrag: Analysis of suggestions for improvements**

<https://efrag.sharefile.com/share/view/se829adbc59c34daa90ea016bf60f916a/fodad0b8-a204-42db-ad5f-2aa970c4fac3>

- Coordinate with the ISSB and other international standards to achieve better alignment
- Alignment with final version of CSRD
- Eliminate the rebuttable presumption
- Ensure machine readability
- Phasing in
- Sector-specific focus
- Specify and clarify terms and definitions
- Integrated reporting
- Provide further guidance

## **Recent evolution CSRD Text approved by the European Parliament**

- 10/11/2022 The European Parliament voted the final text of the CSRD embedding proposals for amendments collected during the Public Discussion Phase (from April to August 2022). The text shall be submitted to the Council of European Union.
- 28/11/2022. Council of European Union approval of the final text received by the EU parliament
- 16/12/2022 Publication in GUCE
- 31/12/2022 Member States supposed to adopt the CSRD.
- 2024 First year of CSRD implementation

## **Recent evolution**

### **15/11/2022 EFRAG Draft approval**

EFRAG voted the Agreement on first set of draft ESRS to be submitted to the EC (subject to editorial changes)

[DRAFT ESRS 1 General requirements 14 November\\_.pdf](#)

[Draft ESRS 2 General Disclosures 15 November 2022.pdf](#)

[Draft ESRS E1 Climate Change-141122\\_.pdf](#)

[DRAFT ESRS E2 Pollution 15 November 2022.pdf](#)

[DRAFT ESRS E3 Water and marine resources 15 November 2022.pdf](#)

[DRAFT ESRS E4 Biodiversity and ecosystems 15.11.2022.pdf](#)

[DRAFT ESRS E5 Resource use and circular economy 15 November 2022.pdf](#)

[DRAFT ESRS G1 Business Conduct 15 November 2022.pdf](#)

[DRAFT ESRS S2 Workers in the value chain 15 November 2022.pdf](#)

[DRAFT ESRS S3 affected communities 15 November 2022.pdf](#)

[DRAFT ESRS S4 Consumers end users 15 november 2022.pdf](#)

## Open Issues

- Comparing sustainability reporting: standardizing the material aspects name
- Simplifying sustainability reporting for SMEs
- Establishing standards for sustainability reporting certification

# ***EFRAG SRB 15 November 2022 Cover Note draft ESRS Set 1 Approval***

- There are no elements that would lead to consider that a re-exposure is needed.
- More research and consultation in the coming months:
  - possible inclusion of a phase-in provision that would allow financial market participants (banks, insurers, asset managers) to postpone the inclusion of downstream value chain
  - ethnicity is a priority topic for EFRAG future research and consultation in the coming months.
  - disclosing quantitative data on financial effects arising from opportunities
  - the implementation of the impact materiality, to support the correct interpretation of the threshold and to support preparers in the implementation of the impact materiality
- The SRB has agreed on a number of changes to the drafts and these changes are already reflected in the drafts uploaded for approval on this meeting.
- Next step: editorial reviews of the drafts

# ***EFRAG SRB 15 November 2022***

## ***Changes in cross-cutting standards drafts: ESRS 1***

- Approach to materiality: some changes
- Criteria for impact and financial materiality: the threshold for material impacts, risks and opportunities for reporting is now linked to the concept of them having respectively material effects on people and the environment and material financial effects
- The language on financial materiality has been adjusted to come closer to the IFRS S1 language.
- The overall approach to value chain information is confirmed. However, the wording has been reinforced to clarify the focus on material impacts, risks and opportunities.
- The reference to the Member States option in the CSRD to omit prejudicial information has been replaced by a new option to omit information on intellectual property, know-how or result of innovations.
- The possible sources of incorporation by reference has been broadened to also include EMAS



# ***EFRAG SRB 15 November 2022***

## ***Changes in Cross-cutting standard drafts: ESRS 2***

- Structure and index adjusted to mirror TCFD/IFRS four pillars, targets moved at the end, together with metrics.
- Elimination of the datapoint: number of significant positions and commitments, and the nature of the commitments of members of the administrative, management and supervisory bodies (AMSB).
- The numbering of DRs in this paragraph refer to their identification number in the EDs.
- Elimination of the datapoint: key decisions made by the AMSB to address material IROs and of the specifications of which matters triggered initiatives to adjust the undertaking's strategy and business model.
- Merger of three DRs (Market position, Strategy and Business Model and Value Chains). Elimination of the datapoint: breakdown of revenues by significant country.
- Rationalization and streamlining of content and language in SBM and IRO.
- Reporting on opportunities: provided new guidance on what the reporting on opportunities should contain.

# ***EFRAG SRB 15 November 2022*** ***Changes in topical standards drafts***

ESRS E1

ESRS E2

ESRS E3

ESRS E4

ESRS E5

ESRS S1

ESRS S2/S3/S4  
(mainly editorial changes)

ESRS G1

# CSRD: Sustainability Reporting Certification

## Article 26°: Assurance standards for sustainability reporting

1. Member States shall require statutory auditors and audit firms to carry out the assurance of sustainability reporting in compliance with the assurance standards adopted by the Commission in accordance with paragraph 3.
2. Member States **may** apply national assurance standards, procedures or requirements as long as the Commission has not adopted an assurance standard covering the same subject matter. Member States shall communicate the national assurance standards, procedures or requirements to the Commission at least three months before their entry into force.  
NOTE: the EU Commission shall issue a standard within 2026.

## At present does not exist a European standard specifying requirements for:

- a) the sustainability reporting certification for auditors, audit firms and accredited bodies
- b) accreditation of independent certification providers

DILIGENTIA PUBLISHED «SRC2030 Diligentia Guidance for sustainability reporting certification and is now leading a project to transform this document in a UNI Pdr (Prassi di riferimento)



Norme