

Comments

Amendments to Delegated Acts of the EU Taxonomy

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The **German Banking Industry Committee** is the joint committee operated by the central associations of the German banking industry. These associations are the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken (BVR), for the cooperative banks, the Bundesverband deutscher Banken (BdB), for the private commercial banks, the Bundesverband Öffentlicher Banken Deutschlands (VÖB), for the public banks, the Deutscher Sparkassen- und Giroverband (DSGV), for the savings banks finance group, and the Verband deutscher Pfandbriefbanken (vdp), for the Pfandbrief banks. Collectively, they represent approximately 1,700 banks.

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Executive summary

The German Banking Industry Committee (GBIC) welcomes the European Commission's Omnibus Simplification Package. The EU Taxonomy is to become more practical and more efficient, in order to relieve both the financial sector and the real economy while simultaneously promoting sustainability objectives. The GBIC presents the following proposals:

Supervisory disclosure and reporting requirements for credit institutions must be aligned with the proposed changes to the statutory reporting requirements

To ensure that the European Commission's proposal provides real relief to corporate undertakings, disclosure and supervisory requirements specific to banks will also have to be adjusted (including but not limited to CRR III, Pillar 3 disclosures and ESG Risk Management requirements from the ECB/EBA). If no alignment takes place, banks will be faced with a gap in the data that would have to be closed using standalone, individual queries to clients.

Taxonomy reporting obligations must be suspended

The GBIC is calling for taxonomy reporting to be put on hold in CSRD reporting as well as in Pillar 3 disclosure until the comprehensive revision of the taxonomy reporting is complete. Doing so will prevent credit institutions from having to continuously adjust their reporting to this and upcoming changes including the planned comprehensive review.

Fundamental simplification and optimisation of taxonomy reporting (including Green Asset Ratio, GAR) must be provided

We recommend an effective procedural relief, necessary to ensure that amendments to taxonomy reporting pursuant to Article 8 of the Taxonomy Regulation represent more than just changes to the layout of the reporting templates:

- Fundamental reduction in the number of templates and streamlining of the remaining templates. To reduce the number of templates, we call for the removal of the Trading Book, Fees & Commission and sector templates in the Annex VI for banks, as well as all Gas & Nuclear templates. To streamline the remaining financial institution templates, we call for removal of the requirement to break down reporting based on the type of counterparty / exposure category.
- The usefulness of the GAR continues to be questionable, particularly as it lacks relevance for managing banks and steering portfolios. At the very least, we recommend an additional GAR-revision to ensure that the denominator and numerator are completely aligned and the introduction of the option to voluntarily include further data into the GAR calculation.

DNSH – number of criteria and assessment burdens must be reduced

The taxonomy assessment must be simplified in order to improve the functioning of the taxonomy. The focus of the revision should be on DNSH criteria, which are particularly challenging in practice. DNSH assessment burdens must be reduced, by, among other things:

- Waiving the assessment of DNSH criteria for low-risk residential property financing and retail loans for financing electric vehicles.
- Allowing credit institutions to trust in taxonomy information provided by undertakings subject to reporting requirements and suitable proof from borrowers without any added assessment.
- Ensuring that the MMS assessment does not apply to undertakings within the EU.

GBIC Comments on the European Taxonomy Regulation regarding the European Commission's proposed amendments to the delegated acts on climate (2021/2139), environmental (2023/2486) and disclosures (2021/2178)

The German Banking Industry Committee (GBIC) welcomes the initiative of the Omnibus simplification package to amend and harmonise several thematically related delegated regulations simultaneously. We are in favour of the objectives therein; providing bureaucratic relief to businesses, ensuring that the scope of information required for reporting is both easier to manage and more relevant for decision-making and, last but not least, promoting Europe's ability to compete on a global stage.

The goal of optimising implementation by simplifying the EU taxonomy and easing reporting requirements has our wholehearted support. More specifically, in terms of the proposed amendments to the EU taxonomy's delegated acts subject to consultation, we welcome the fact that some of the amendments are consistent with proposals that the GBIC put forward in our position paper on the Omnibus simplification, which was published in February (see website - [Link](#)). However, we believe there is an even greater potential for simplifying fundamental taxonomy mechanisms and improving the usability of the taxonomy.

Alongside the introduction of reporting simplifications for non-financial businesses, the different requirements of the financial sector in relation to data from its counterparties need to be adapted in tandem. Financial institutions must be able to adequately manage risks and their portfolios and meet their supervisory reporting requirements. A comprehensive and standardized data set is a key prerequisite for this. To ensure that businesses truly experience relief, and to avoid a trickle-down effect, it is **essential that reporting obligations specific to banks (Pillar 3 disclosure) and data requirements within the risk management framework (ECB Guide, EBA Guidelines on the Management of ESG risks) are also amended as part of this process**. This is especially relevant for the mandatory inclusion of individual borrower data in ESG scoring and credit decisions for corporate clients who are not subject to reporting requirements. At the very least, the EBA Guidelines on the Management of ESG risks should be aligned with the changed scope of the CSRD. In addition, the ESG disclosure requirements listed in CRR III (Capital Requirements Regulation) for all banks, as well as the new ESG reporting system, should be examined carefully and reviewed. As a minimum, **the scope of application for Pillar 3 ESG disclosure (Art. 449a CRR) should be aligned with that of the CSRD**. On the one hand, institutions that are not subject to the CSRD should also be explicitly excluded from the scope of application of Art. 449a CRR (and ESG reporting, Art. 430 lit. h CRR); on the other hand, the granular requirements of the EBA ITS - particularly in the quantitative templates - should relate exclusively to the risk exposures to counterparties that are themselves subject to CSRD reporting.

Similarly, in the sense of "**reporting only once**", taxonomy templates should only be disclosed in the CSRD (Corporate Sustainability Reporting Directive) report, with no requirement to also disclose them to supervisory bodies.

In light of this and considering the fact that the fundamental revision of the taxonomy disclosure requirements and the technical screening criteria (TSC) has not yet taken place, we call for suspension of the taxonomy reporting and disclosure requirements until the full review of all relevant regulations has been completed.

This could, for example, be considered in the Stop-the-Clock Omnibus or through an amendment to the Delegated Acts of the Taxonomy as well as the Pillar 3 disclosure. If requirements are not suspended, financial institutions already subject to reporting requirements will first have to make laborious adjustments to their internal reporting systems and processes to incorporate the amendments to the delegated acts under consultation, and then once more for amendments made as part of the Omnibus proposal, and then yet again for the amendments made as part of the fundamental revision of taxonomy disclosure requirements. Not to mention that disclosures made during this interim period would not result in any comparable or meaningful indicators over time that could possibly justify the amount of work required. If it is not possible to suspend these requirements, there should be a transition period during which institutions could voluntarily select the option of continuing to use the old templates in order to avoid recurring costs due to IT changes since these have already been implemented.

Our detailed and specific remarks and recommendations on the European Commission's proposal are as follows:

1. Template simplification and amendments to GAR

We welcome the simplification of templates for credit institutions, in particular the following relief:

- Reduction in the extent of the templates
- Removing templates 2 - 4 on nuclear and gas activities
- Sample templates that can be edited in Excel

However, we have as yet to determine how these simplifications would add up to the indicated reduction in scope of 89%, as underlying processes to collect and compile the necessary information still remain. We do see the potential for additional simplification and adjustments to the amendments proposed by the European Commission.

1.1 Additional removals and fundamental simplification of templates with the objective of reducing the time and effort required

We believe that the proposed reduction in the number of data points to be reported, which would indeed shorten the templates, would only make the templates easier to read, and would not in fact lead to a reduction in the amount of work needed to fill out the templates.

As such, the proposed amendments provide practically no relief to those responsible for preparing reports.

We therefore call for, at least and in the short term:

- **Removal of all templates pertaining to nuclear/gas** (including 1 and 5), as these simply cover some of the information already reported in the other templates. In addition, there is widespread uncertainty regarding the object of the tables (e.g. do they pertain to general lending, only use of proceeds known, should they also include exposures to financial institutions, etc.).
- **Removal of the Templates for Fees & Commission and Trading Book KPI (Key Performance Indicator)** (Annex VI for credit institutions Templates 6 and 7), which are not relevant and also do not have any direct connection to economic activities. In addition, trading book transactions are by nature short-term.
- **Removal of sector reporting** (Annex VI for credit institutions, Template 2), as sector specific data is not relevant to the GAR, and these templates simply report on some of the information already included in other templates.
- **General simplification of templates:**
 - The taxonomy reporting templates require that reporting be separated based on the type of counterparty. Banks are then required, in addition, to separate their exposures for each type of counterparty into different types of exposures (loans and advances, debt securities, equity instruments). This breakdown does not provide any relevant additional value in terms of the information gained and should be removed.
 - The following requirement from Annex V Template 1 also appears to be superfluous: "Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow." We do not believe that the provision of 'flow sizes' in conjunction with the exposures contained in the GAR denominator is expedient, as this does not increase the amount of information available. Not only that - but the additional effort required is not at all proportional to the minimal benefits gained.
 - Improved facilitation in using the templates: We generally recommend providing the Excel templates with formulas to avoid misunderstandings in the calculation of values. Specifically, if Template 7 is not removed, a filled-out example should be provided to illustrate how purchases and sales should be reported at the instrument level.

If the taxonomy reporting should not be entirely suspended as stated above, credit institutions should have the option to continue using the existing methodology for their reporting until the taxonomy has been revised.

We are also calling for the EU to "stop the clock" by removing the taxonomy templates in the semi-annual Pillar 3 report by 30 June 2025 (this can be achieved by amending the ITS (EU) 2022/2453 as quickly as possible). In line with the "reporting only once" principle, the

taxonomy templates should not have to be disclosed in the Pillar 3 report. The EBA has not adjusted its Green Asset Ratio templates to the taxonomy changes from 2023. Now, new adjustments are being consulted under the Have-your-say initiative. If multiple disclosures remain, institutions will face double work and, due to delays at the EBA/EU Commission, conflicting requirements from different authorities/regulations.

1.2 Additional improvements to the GAR

The European Commission has announced an additional upcoming revision to the delegated act on taxonomy disclosures to address, in particular, the challenges represented by the differing scope of information included in the GAR denominator and numerator. We call for the following measures to be subject to this review:

- **Ensure alignment of the GAR denominator with the GAR numerator:** When including corporates, only those that are subject to reporting obligations under the CSRD should be mandatorily considered in the numerator and denominator according to the Commission's proposal. In the interest of symmetry, local governments, not just companies, could also be excluded from the denominator as long as they cannot be considered in the numerator. We request clarification on how claims against CSRD-reporting counterparties should be considered in the GAR if they are not subject to EU taxonomy reporting obligations (revenue less than EUR 450 million) and do not provide data or only report partial alignment.
- **Including specialized financing through Special Purpose Vehicles (SPVs):** SPVs (according to the criteria of Article 147 paragraph 8 of the CRR) are typically used for financing energy projects, commercial real estate, or transport financing. These are essential for the transformation of the economy and the fight against climate change, and thus a key component of the EU Taxonomy objectives. Financial institutions should have the voluntary option to include specialized financing through SPVs with the appropriate purpose, regardless of the reporting obligations of the involved companies, in the numerator and denominator if a bank manages to collect the information regarding Taxonomy alignment.
- **In financing chains involving multiple financial institutions (see DDA, Annex V 1.2.1.2.; risk positions towards financial companies) with the use of proceeds known,** the assessment should be based on the Green Asset Ratio of the direct business partner, provided that no further information on the specific financing of the indirect business partner is available.
- **Providing reporting support for institutions:** Whether or not undertakings are included in taxonomy KPIs is largely dependent on whether or not they are subject to a reporting obligation pursuant to the CSRD. An EU-wide register of businesses with reporting obligations pursuant to the CSRD should therefore be created. This will simplify implementation of taxonomy reporting requirements. If this register cannot be created in a timely manner across the EU, national solutions should be put in place instead.

1.3 Alignment of templates and delegated acts, as well as ensuring consistent terminology applied in the templates

We were able to identify, in the new Annex III (which replaces Annex VI), some inaccuracies within the templates – including in regard to the legislation. These should be addressed by the European Commission. We propose the following:

- **Amendment/correction of GAR requirements in Template 1 for credit institutions:**
 - Template 1 is not consistent with the proposed alignment of the GAR numerator and denominator, see row 19 ff “Assets excluded from the numerator for GAR calculation (covered in the denominator)”. When implementing the proposals in the main text of the delegated draft act, within the template 1 the exposures towards non-CSR companies should be included under “Assets not covered for GAR calculation” (row 36), that is not under “Total GAR assets”.
 - As we understand the information in the consultation draft, template 1 must be reported 4 times. We could not find the provision of “Stock” and “Flow size” in template 1 in the consulted delegation act. We do not believe that the provision of ‘flow sizes’ in conjunction with the exposures contained in the GAR denominator is expedient, as this does not increase the amount of information available. Not only that, but the additional effort required is not at all proportional to the minimal benefits gained. A more specific execution or adjustment to the content, in which the numerator size is waived in the template and a clear explanation is provided in the consultation draft, would be helpful.
- **Standardise terms in the templates:** The column names in templates 1, 3, 4, 5 and 6 should be changed from “Substantial contribution to environmental objectives” to “Environmental objectives”, and this should also be adopted in template 7, in the event that templates 6 and 7 are retained.

In this context, we would like to point out that any changes to the reporting obligations would be associated with extra work in their implementation.

Irrespective of the ongoing efforts to revise the underlying methods, it is clear that the GAR is not a suitable instrument for steering banks. This is due both to the low coverage offered by the taxonomy and its binary nature, in which intermediate steps towards sustainable economic activity are only taken into account nominally, if at all. The significance of the GAR continues to be particularly limited for smaller institutions that only provide financing to a very few undertakings subject to CSRD reporting obligations. The work required is entirely disproportionate to the benefits gained from these reporting obligations, even after the amendments are implemented.

2. DNSH criteria: simplifications in the assessment process and reducing the number of criteria

The GBIC supports a systematic and thorough review of all assessment criteria, particularly the DNSH (do no significant harm) criteria in the delegated acts on climate and environmental goals. The aim should be simplification, applicability in practice and better alignment with existing EU legislation. To simplify the assessment process for Taxonomy reporting, the GBIC proposes several measures below that will improve the functioning of the taxonomy, including a simplified assessment of DNSH criteria, the technical screening criteria and higher risk-based differentiation options. In general, the criteria for environmentally sustainable economic activities under Article 3 of the Taxonomy Regulation for determining taxonomy alignment (substantial contribution and DNSH) should be fundamentally simplified and, above all, reduced. In many economic activities, too many climate, environmental and social objectives are pursued simultaneously; the numerous DNSH criteria, in particular, are often almost impossible to fulfil (e.g. renovation of buildings). It would be better to focus on the environmental objective of climate mitigation and the technical screening criteria of the individual economic activities that make a significant contribution to this environmental objective.

In detail, we propose the following specific improvements:

- **Differentiating the assessment scope according to risk:** the scope of the assessment to be performed should also be determined according to risk.

In the case of low-risk residential real estate financing (new construction, renovation, acquisition & ownership), a significant simplification could be represented by completely waiving the assessment need for the DNSH criteria for retail loans. Complex and cost-intensive assessments of small-scale transactions are not conducive to helping the transformation. The considerable additional costs undermine national and European efforts to reduce construction and renovation costs in order to contribute to providing more affordable housing. A recommendation in the draft report of the Platform for Sustainable Finance (PSF) from 8 January 2025 also suggests simplifying fulfilment obligations for renovating residential properties.

In the case of retail loans for the financing of electric cars (economic activity 6.5), only the substantial contribution to the environmental objective of climate change mitigation should have to be assessed, not the requirements for external rolling noise or the rolling resistance coefficient of the tyres.

- **Use of counterparty's taxonomy assessment results:** When financing companies subject to sustainability reporting requirements financial institutions should be allowed to adopt their reported taxonomy data without further assessment in the case of "use of proceeds" financing. This would prevent costly duplicate audits by the non-financial undertaking and then also by the financial undertaking.
- **Simplifying DNSH:** We propose streamlining the number of requirements, evidence and documentation of DNSH criteria for earmarked (use of proceeds) financing, such as

project financing or real estate. So, for example, suitable evidence from the borrower could be used to confirm compliance with the DNSH criteria (e.g. BREEAM, LEED, compliance with relevant ISO standards) without having to assess the DNSH criteria again (with the exception of DNSH criteria for the environmental objective of climate change adaptation). For example, in the case of industrial serial products, type certifications could replace the case-by-case taxonomy review by the acquiring/installing companies and the institutions financing these investments.

The DNSH criteria for a downstream economic activity should not be more extensive and far-reaching than for an upstream activity. In concrete terms, the DNSH criteria for financed and leased vehicles should not extend beyond the DNSH criteria for vehicle manufacture. This applies in particular in terms of assessment requirements on tyres, which is challenging due to the lack of data and amount of effort involved. In the interests of simplification, the taxonomy criteria contained in 3.3 of Annex I of Delegated Regulation (EU) 2021/2139, could apply to financed and leased vehicles in future, as well as to vehicle manufacturers, rather than the taxonomy criteria of 6.5.

- **Delete or adapt minimum social safeguards:** With regards EU-based counterparts, the criterion for checking minimum safeguards in accordance with Article 3(c) Taxonomy Regulation should either be deleted or, if there are no known indications of violations by the counterparty, generally considered to have been met. This criterion is not helpful, as the intended minimum social safeguards are already guaranteed in full by other EU regulations (checking taxonomy alignment only for non-EU companies).
- **Reduce the complexity of technical screening criteria and improve availability of data:** The PSF correctly states at several points in its above-mentioned report that the data required to fulfil the DNSH criteria, in particular, is often not available, thereby making use of the taxonomy and the required reporting more difficult (footnote: e.g. PSF report, page 93, Recommendation for future developments: "2. Review building-specific DNSH criteria and simplify reporting requirements [...]"). So, for example in the context of DNSH assessments for renovations, evidencing compliance with water consumption, recycling quotas and pollutant limits requires an enormous amount of effort and is often impossible. Any data gaps would have to be addressed with standardised legal requirements for the real economy across Europe. In order to collect the necessary data, it is essential to set up relevant databases quickly and accessibly. We welcome PSF recommendations to set up an accessible database (footnote: PSF report, page 93, Recommendations outside the Climate Delegated Act: "Allow investors, lenders, and certifying bodies to have direct access to EPC databases and develop an EU-wide framework of unique identifiers, e.g., based on geo coordinates, such that lenders are in a position to conduct automated checks to identify when EPC or updated EPC are available.") and for the transitional use of proxies in the event of current gaps in the data.
- **Improve coordination of activities, "Renovation of existing buildings" and "Acquisition and ownership of buildings":** Necessary renovation measures are often covered by the finance for the purchase of the buildings (acquisition & ownership). In many cases, only a small part of the loan is used for the renovation. Although a 30% reduction in primary energy demand (evaluation criterion for renovation) is often achieved, the renovation, however, often does not result in the building achieving energy efficiency class A or being in the top 15% of the building stock. This means that after the renovation, the building does not meet the relevant taxonomy criteria for "Acquisition and ownership of buildings" and, as a result, the overall financing cannot be

classified as taxonomy aligned. Fortunately, this problem has also been recognised by the PSF) in its Draft Report on Activities and Technical Screening Criteria to be Updated or Included in the EU Taxonomy. We therefore propose better coordination between the activities "Renovation" and "Acquisition and Ownership of Buildings". The technical screening criteria should be redesigned to incentivise the financing of energy-efficient renovations. We therefore propose that the whole loan, and not only the part of the loan used for renovations, can be declared "green" in terms of the taxonomy if the requirements of the activity "Renovation" are met. This would have to be accompanied by a drastic reduction in the DNSH-criteria with a clear focus on a few key criteria for the decarbonisation of the building stock and simplification of the verification process (based on currently available data).

- **Reviewing to what extent statutory requirements could replace a DNSH assessment:** In addition to the very specific proposals mentioned above, we would like to suggest that the DNSH criteria be reviewed in particular to determine where, especially within the EU, it can be assumed that companies comply with the legal requirements (in the sense of a "licence to operate") in their jurisdiction. In any case, we recommend making available a list of DNSH criteria mapped against the relevant regulations of countries in the EU.

We would urge the EU-Commission to include appropriate deadlines for implementation of the upcoming adjustments/simplifications in order to help the institutions plan accordingly.

3. Introduction of materiality thresholds

The introduction of materiality thresholds (10% threshold on the level of economic activities) would, in principle, be welcome as a means of ensuring that taxonomy reporting is more pragmatic, and that evaluation of taxonomy eligibility or alignment is focused on material activities. However, if these materiality thresholds are to provide relief to financial institutions, they must be designed accordingly and must grant appropriate leeway to credit institutions in the application, analogous to materiality principle in the financial reporting.

In addition, the requirement to list "non-material" values (those under 10%) separately should be discarded, as this will once again result in additional effort that is not justified due to the immateriality of the information.

4. Introduction of transition activities

At present, the taxonomy is entirely binary. Intermediate steps towards sustainability, which are essential for fostering the green transition, are barely represented. A greater focus should therefore be placed on transition finance and voluntary principles for credible transition plans. In this context, however, there is a need to carefully examine to what extent the EU Taxonomy is suitable for being a classification framework for transition activities and whether the proposed reporting on "partial taxonomy alignment" can offer added value,

and if this is proportionate to the extra work it will create. The GBIC is concerned that 'partial alignment' does not represent a simplification, but rather a methodological expansion and thus an additional effort for reporting financial institutions. Therefore, it is essential to thoroughly examine whether a methodological expansion within the framework of this simplification initiative is sensible.

5. Recommendations on the use of FAQs

Even though the FAQs are not part of the consultation, it is important that "soft laws" do not unintentionally make requirements more stringent.

The EU-Commission regularly publishes FAQs to support businesses in interpreting EU regulation. The goal is to use the Taxonomy FAQs to improve the applicability and comparability of the reported data. The FAQs are "soft law", and as such not legally binding, however, in practical terms, they are usually adopted in full by statutory auditors during audits and in individual cases are applied very restrictively. This means that the FAQs have a de facto binding effect. This becomes a problem when the FAQs interpret regulations to be more restrictive than intended by the primary sources (Level 3 goes above and beyond Level 2). Tools designed to assist in implementation thus quickly become barriers to same.

In light of this, we call for FAQs and other recommendations to also be the subject of public consultations. In addition, implementation deadlines must be sufficient and be set for a time after the final version, including consultation, is published. Because there are often technical and data requirements – particularly when implementation involves contracting with external IT service providers – it is often impossible to implement changes immediately. This results in significant compliance and audit risks, which consequently also result in barriers to investment. Not only that, regional and institution-specific differences in the interpretation of the reporting requirements are already making an appearance. This could mean that reported KPIs may not be adequately comparable.

There are currently several FAQ lists on the EU taxonomy, which have been published separately. One consolidated list of FAQs would provide a better overview and considerably reduce the number of documents to be audited.

6. Notes on implementation for financial holding groups

Creation of a clear legal option for financial holding groups to report pursuant to delegated act 2021/2178 on the basis of the scope of their prudential consolidation, similar to institution groups.

Pursuant to Annex V, section 1.1.1, of delegated act 2021/2178 credit institutions shall disclose relevant KPIs on the basis of the scope of their prudential consolidation determined in accordance with Regulation (EU) No 575/2013, Title II, Chapter 2, Section 2. As such, credit institution groups are able to disclose their taxonomy eligible and taxonomy aligned economic activities pursuant to Annex V 2021/2178 on the basis of the same prudential

consolidation as that in Article 449a CRR in conjunction with DA 2022/2453, all within the framework of disclosure requirements pursuant to CRR Part 8.

To foster simplification and increase legal certainty, a financial holding company which is the parent holding company of a financial holding group should get the option of disclosing taxonomy eligible and taxonomy aligned economic activities pursuant to Annex V. This is akin to the requirements for credit institutions that are a parent company for an institution group. This option should be anchored in clear legal certainty by adding to Article 4(1) DA 2021/2178. "Financial holding companies pursuant to Article 4(1) point 20 of EU Regulation 575/2013 can disclose the information named in Article 8(1) of EU Regulation 2020/852 in accordance with Annexes V and XI of this Regulation".

This additional rule should be presented as an option in order to avoid the cost of changing methods. In addition, the following sentence should be added to Annex V 1.1.1 of the same delegated act: "Financial holding companies that undertake disclosures pursuant to Article 4(1) sentence 2 shall disclose relevant KPIs on the basis of the scope of their prudential consolidation determined in accordance with EU Regulation 575/2013, Title II, Chapter 2, Section 2."

7. Notes to amendments of the ESEF RTS

In addition to above GBIC comments on amendments to the EU taxonomy delegated acts, we propose the following for the CSRD amendments.

ESEF format

The ESEF format for sustainability information, as provided for in the CSRD (Article 29d of the Accounting Directive), should only be introduced as a disclosure format after the completion of the omnibus legislative procedure. The ESEF taxonomy should reflect the final version of the ESRS and Art. 8 taxonomy data points and be oriented towards proportionality and simplification. The relevant part of the current [ESMA consultation](#) should be postponed. Experiences with ESEF in the context of financial reporting should be taken into account.