

Normes européennes de reporting sur la durabilité (ESRS): focus sur les normes environnementales

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Agenda



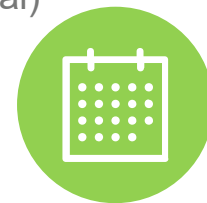
Ce document fait référence au **projet d'acte délégué de la Commission européenne** publié le 9 juin 2023 (traduction libre)

- 1 Introduction
- 2 Overview of ESRS Environment
- 3 Main changes compared to EFRAG's November drafts
- 4 Points of attention
- 5 Operational feedback from Veolia

A photograph of a tea plantation at sunset. The tea bushes are in the foreground, with their green leaves and stems clearly visible. The background shows a soft, golden glow from the setting sun, creating a warm and serene atmosphere. A semi-transparent grey box is overlaid on the center of the image, containing the title text.

Actualité de l'EFRAG et vue d'ensemble du référentiel ESRS

Calendrier de mise en œuvre attendue des ESRS (en attente de l'acte délégué final)

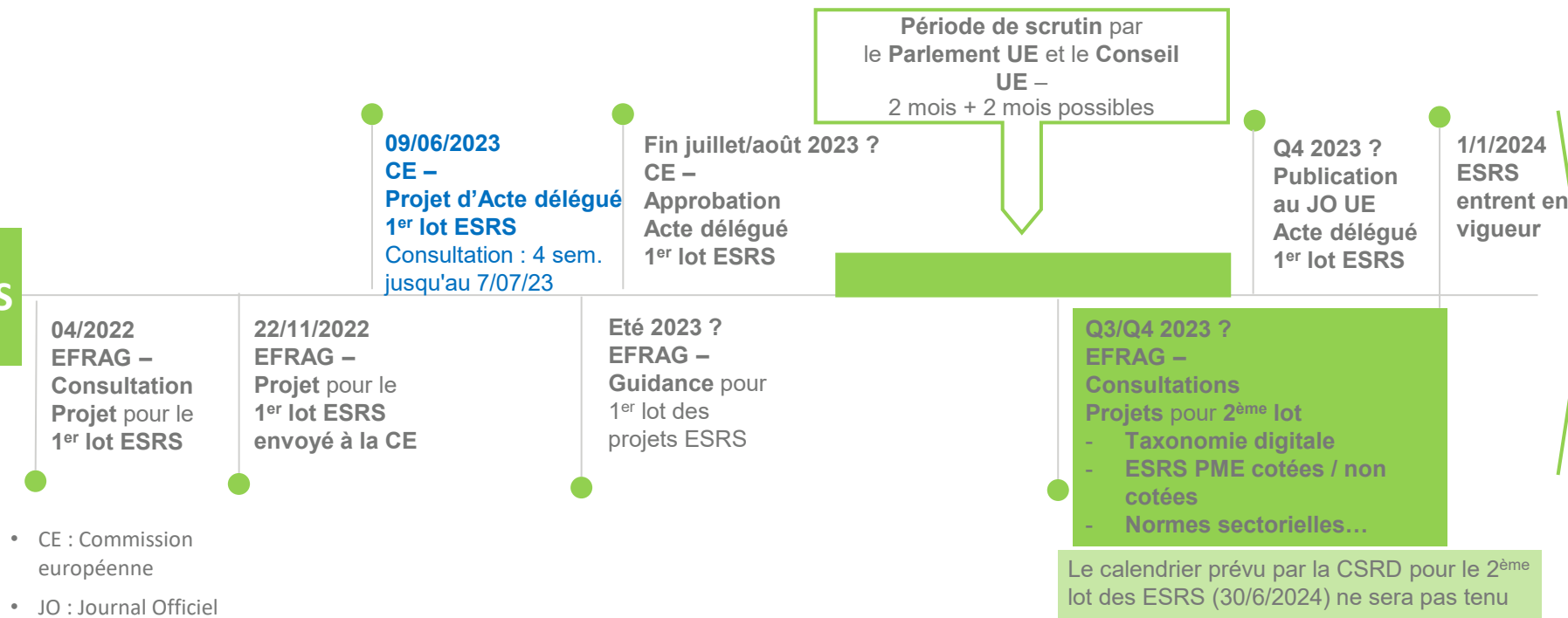


Directive UE ⇒ Transposition par les Etats membres dans le droit national

Réglementation UE ⇒ Applicable dans tous les Etats membres UE sans besoin de transposition

Règlement / Acte délégué UE

ESRS



Programme de travail de l'EFRAG

Développement d'un écosystème de soutien au 1^{er} lot des ESRS

- **Très court terme : accompagner l'application / interprétation du 1^{er} lot ESRS**
 - Développement de **guidance / FAQs** sur l'évaluation de la **double matérialité** et la **chaîne de valeur** – Consultation ?
 - Possibilité de poser des questions sur le site web de l'EFRAG – Timing ?
- **Très court terme : rendre l'accès aux ESRS plus facile**
 - Mise à disposition de la liste des data points ?

Autres activités du programme de travail à court terme

- ESRS pour les **PME cotées (LSME)** ; ESRS pour les **autres PME** à appliquer sur une base volontaire (**VSME**) - Consultation : Q4 2023 ?
- **Taxonomies digitales XBRL pour 1) les ESRS (et 2) la taxonomie environnementale de l'article 8 de l'UE)** - Consultation : Q3/Q4 2023 ?
- **Normes sectorielles** : lot 1 : Finalisation des EDs pour ESRS SEC 1 - Classification sectorielle et approche générale des ESRS spécifiques aux secteurs, et des ESRS SEC pour 1) L'extraction minière, les carrières et le charbon, 2) Le pétrole et le gaz - Consultation : Q4 2023 ?

Activités du programme de travail à moyen terme

- Guidance pour le **secteur financier** : chaîne de valeur
- **Secteurs** – 2^{ème} lot : agriculture, élevage et pêche ; transport routier ; 3^{ème} lot : y compris le secteur financier... etc... Il faudra au moins 5 ans pour couvrir les 40 secteurs identifiés.
- ESRS pour **les groupes non-européens**

Eléments de contexte

- 15 mars : annonce de la présidente [Von der Leyen](#) demandant d'envisager une réduction de 25 % des exigences UE en matière de rapports émis par les entreprises.
- 21 mars : annonce de la [Commissaire McGuinness](#) demandant à l'EFRAG de revoir ses priorités et de se concentrer sur les activités de mise en œuvre du 1^{er} lot des ESRS.

Le premier jeu de normes ESRS

[Projet de Réglementation Déléguée](#) publié par la Commission européenne le 9 juin 2023 – Commentaires avant le 7 juillet

Une présentation par la CE du projet de DA a été faite lors d'une réunion de l'EFRAG SRB le 14 juin (support et replay disponibles [ici](#)).

Les projets de l'EFRAG de novembre 2022 ainsi que les bases de conclusion et des vidéos éducatives (mises en ligne en mars 2023) sont disponibles [ici](#).

Environ 80 “Disclosure Requirements” - DR

- 2/3 informations qualitatives –
1/3 informations quantitatives

Informations sélectionnées selon le principe de la double matérialité

- Matérialité d'impact
- Matérialité financière

3 niveaux d'informations à fournir

- Tous secteurs ('Sector-agnostic')
- Spécifiques au secteur – à venir
- Spécifiques à l'entité

4 domaines sur lesquels reporter

- Gouvernance
- Stratégie (et modèle d'affaire)
- Gestion des impacts, risques et opportunités ('IROs')
- Indicateurs et objectifs ('targets')

Normes transverses	ESRS 1 Principes généraux		ESRS 2 Informations à fournir générales		
Environnement	ESRS E1 Changements climatiques	ESRS E2 Pollution	ESRS E3 Eau et ressources marines	ESRS E4 Biodiversité et écosystèmes	ESRS E5 Utilisation des ressources et économie circulaire
Social	ESRS S1 Force de travail propre	ESRS S2 Travailleurs dans la chaîne de valeur	ESRS S3 Communautés affectées	ESRS S4 Consommateurs et utilisateurs finaux	
Gouvernance	ESRS G1 Conduite des affaires				

Focus on Environment

Cross-cutting Standards

ESRS 1 General requirements

ESRS 2 General disclosures



Environment

ESRS E1 Climate change

ESRS E2 Pollution

ESRS E3 Water and marine resources

ESRS E4 Biodiversity and ecosystems

ESRS E5 Resource use and circular economy



Social

ESRS S1 Own workforce

ESRS S2 Workers in the value chain

ESRS S3 Affected communities


ESRS S4 Consumers and end-users



Governance

ESRS G1 Business Conduct






A photograph of tea plants in a field during sunset. The sun is low on the horizon, creating a warm, golden glow. The tea leaves are vibrant green and some are backlit by the sun, giving them a yellowish-green appearance. The background is a soft, hazy landscape with rolling hills.

Main changes compared to EFRAG's November drafts

Additional phase-in provisions

Full list of phase-in provisions is included in ESRS 1, Appendix C

Standard	Disclosure Requirement	For all companies	For companies and groups with < 750 employees	
			Year 1	Year 2
 ESRS E1- E5	Anticipated financial effects	<ul style="list-style-type: none"> Year 1: may be omitted Year 1-3: qualitative information only* 		
 ESRS E1	Datapoints on scope 3 and total GHG emissions		May be omitted	
 ESRS E4	All disclosure requirements		May be omitted**	May be omitted**

* With limited exceptions and for E1 only if it is impracticable to prepare quantitative disclosures.

** The sustainability matters covered by the ESRS are still to be included in the materiality assessment. A brief description of any time-bound targets, policies, and actions as well as the disclosure of relevant metrics are still required.



Environmental standards: what has been changed ?



Changes (not all changes are presented)

ESRS E1

When disclosing energy consumption from different sources, **nuclear** is now presented as a separate category

Before: nuclear was a part of "non - renewable" together with fossil fuels

NEW

ESRS E2

Notion of **operational control** for pollution.
The consolidated emissions amount shall include in the basis for calculation **both** the assets or sites on which the undertaking has **financial control** and those on which the undertaking has **operational control**

Before: there was no notion of operational control for pollution

All ESRSs

Removal of many references to **private sources** of information and possible guidance - **TNDF, Water Risk Atlas tool Aqueduct** etc.



Making some disclosures voluntary

ESRS E2 - E5

Use of **LEAP methodology** for materiality assessment made voluntary

Classification of each action according to a layers of the **mitigation hierarchy**

Consideration of **ecological thresholds** in target setting

ESRS E4

Metrics on invasive alien species, impact drivers of land - use change, and ecosystem extent and condition

Land - use based on life cycle assessment

Biodiversity transition plan

Compatibility of business model and strategy with "planetary boundaries"

Anticipated financial effects



Key points:

➤ **For ESRS E2, E3, E4, E5**

- There is the following notion: "a quantification of the anticipated financial effects in monetary terms before considering pollution-related actions, **or where not possible without undue cost or effort, qualitative information.**"

➤ **For ESRS E1**

- Metrics are more precise, for example:

Anticipated financial effects from material **physical risks**

- *the **monetary amount and proportion** (percentage) of **assets at material physical risk** (before climate change adaptation actions) (SML - short, medium, long)
→ assets disaggregated by acute and chronic physical risk and location using NUTS (Nomenclature of territorial units for statistics)*
- *the **proportion of assets** at material physical risk **addressed by the climate change adaptation actions***
- *the **monetary amount and proportion** (percentage) **net revenue from its business activities at material physical risk** (SML)*

ESRS Env - Anticipated financial effects

ESRS E1

in monetary terms of single amount or a range
> before mitigation and adaptation related actions

Anticipated financial effects from material **physical risks**
Anticipated financial effects from material **transition risks**
Anticipated financial effects to pursue climate-related **opportunities**

ESRS E3

in monetary terms of single amount or a range
> before water and marine resources related actions

Anticipated financial effects due to material risks arising from water and marine resources-related impacts and dependencies

ESRS E4

in monetary terms of single amount or a range
> before biodiversity and ecosystems related actions

Quantification of the anticipated financial effects

ESRS E2

in monetary terms of single amount or a range
> before pollution related actions

Share of net revenue made with products and services that are or that contain **substances of concern** and **substances of very high concern**

Operating and capital expenditures occurred in the reporting period in conjunction with major incidents and deposits

Provisions for environmental protection and remediation costs (e.g., for rehabilitating contaminated sites, recultivating landfills, ...)

ESRS E5

> before resource use and circular economy related actions

Quantification of the anticipated financial effects

A photograph of a tea plantation at sunset. The tea bushes are in the foreground, with their green leaves and stems clearly visible. The background shows a soft, golden glow from the setting sun, creating a hazy, atmospheric effect. A semi-transparent grey rectangular box is centered over the image, containing the text "ESRS Overview" in white.

ESRS Overview

ESRS E1 - Climate change

Overview

*climate change
mitigation*

*climate change
adaptation*

energy

ESRS E1 should be read in conjunction with ESRS 1 and ESRS 2

1

Gov.

ESRS 2 GOV-3 –
Integration of sustainability- related
performance in incentive schemes

2

Strategy

E1-1 – Transition plan for
climate change mitigation
ESRS 2 SBM-3 – Material
impacts, risks and
opportunities and their
interaction with strategy and
business model(s)

3

IRO management

ESRS 2 IRO-1 – Description of
the processes to identify and
assess material climate-related
impacts, risks and opportunities
E1-2 – Policies related to
climate change mitigation and
adaptation
E1-3 – Actions and resources
in relation to climate change
policies

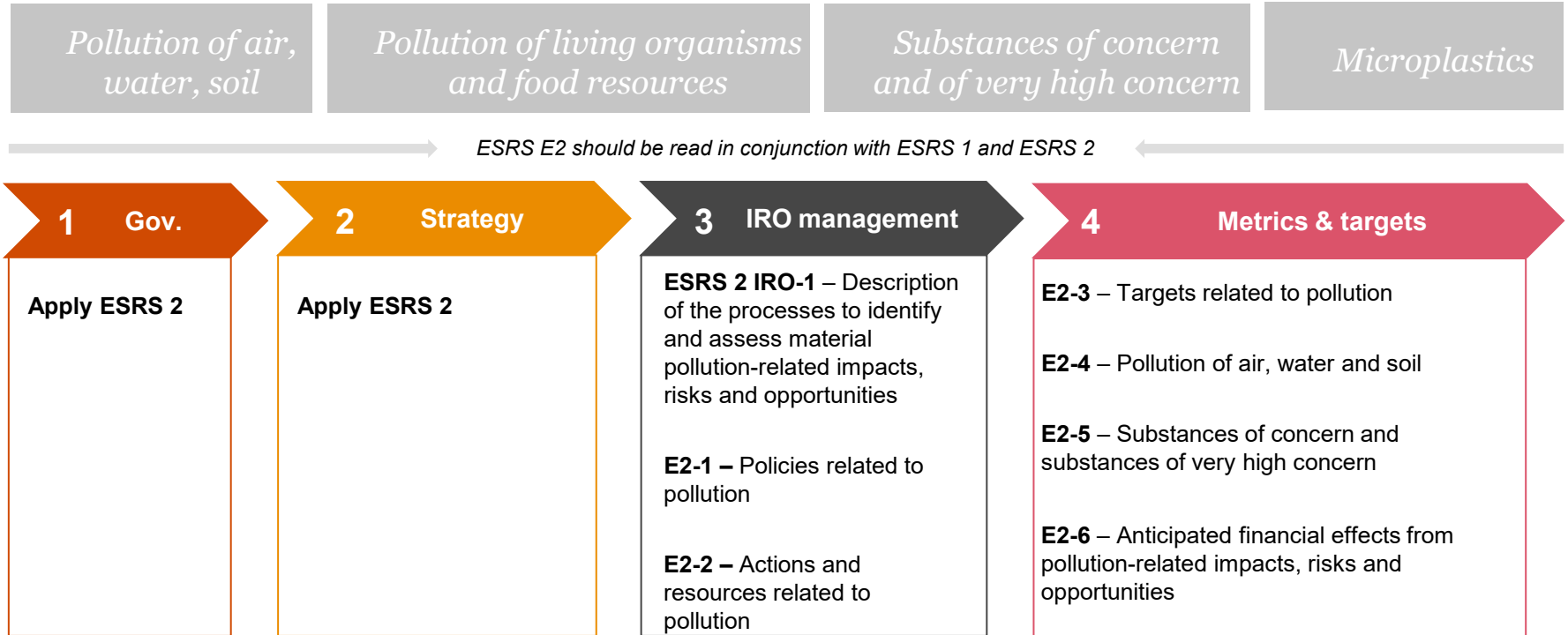
4

Metrics & targets

E1-4 – Targets related to climate
change mitigation and adaptation
E1-5 – Energy consumption
and mix
E1-6 – Gross Scope 1, 2, 3 and
Total GHG emissions
E1-7 – GHG removals and GHG
mitigation projects financed
through carbon credits
E1-8 – Internal carbon pricing
E1-9 – Anticipated financial effects
from material physical risks,
material transition risks and
climate-related opportunities

ESRS E2 - Pollution

Overview



ESRS E3 - Water and marine resources

Overview

Water

Marine resources

Water consumption

ESRS E3 should be read in conjunction with ESRS 1 and ESRS 2

1 Gov.

Apply ESRS 2

2 Strategy

Apply ESRS 2

3 IRO management

ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

E3-1 – Policies related to water and marine resources

E3-2 – Actions and resources related to water and marine resources

4 Metrics & targets

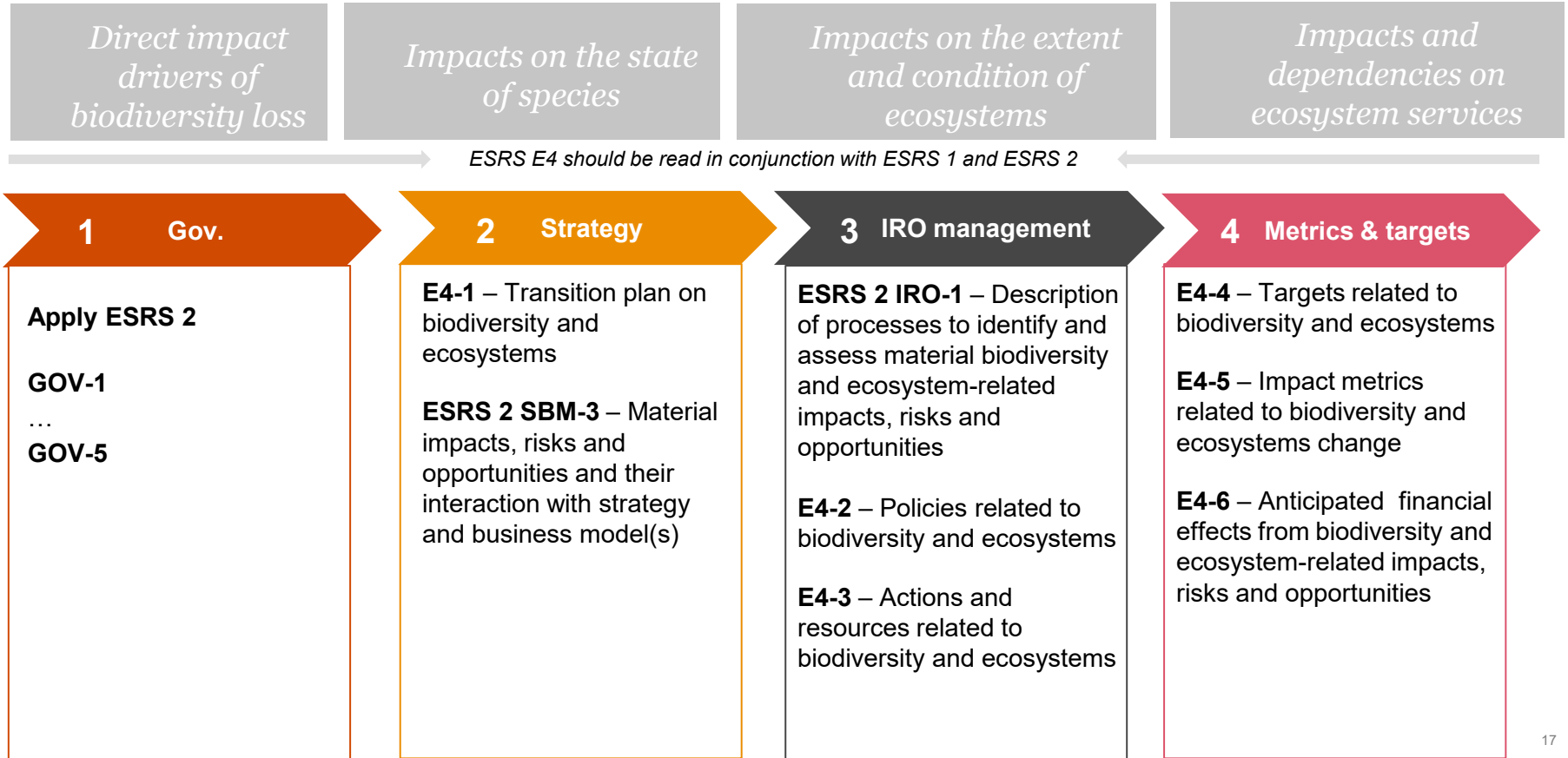
E3-3 – Targets related to water and marine resources

E3-4 – Water consumption

E3-5 – Anticipated financial effects from water and marine resources-related impacts, risks and opportunities

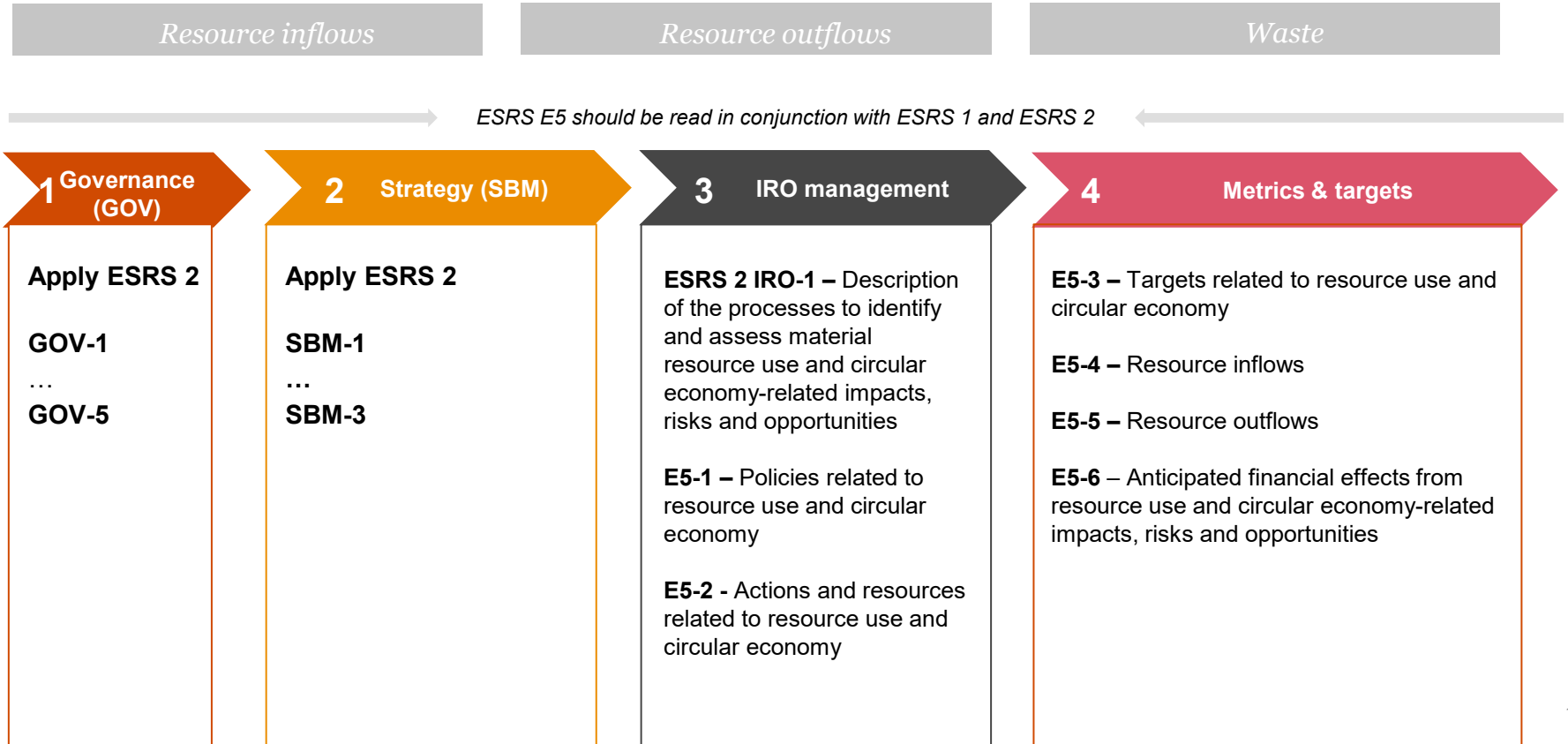
ESRS E4 - Biodiversity and ecosystems

Overview



ESRS E5 - Resource use and circular economy

Overview



Link between all environmental ESRS

Environmental ESRS are all related to nature and reflects the IPBES impact drivers on nature change:

IPBES drivers on nature change	Land/Water/Sea Use Change			Resources exploitation		Climate change	Pollution				Invasive and others	
	Terrestrial ecosystem use	Freshwater ecosystem use	Marine ecosystem use	Water use	Other resources exploitation	GHGs emissions	Non-GHG air pollutants	Water pollutants	Soil pollutants	Solid waste	Disturbance	Biological alteration
E1 – Climate change												
E2 – Pollution												
E3 – Water and marine resources												
E4 – Biodiversity and ecosystems				Included in the materiality assessment, no specific disclosure unless an impact on biodiversity and ecosystems is assessed								
E5 – Resource use and circular economy												

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ESRS Env
Points of attention



ESRS



1

ESRS E1
- Scope 3
- Operational control

2

**ESRS E2 - Substances of concern
& substances of very high concern**

3

ESRS E3 - Water indicators

4

ESRS E5 - Resource inflows/outflows

5

**ESRS E4 - Biodiversity metrics
And operational feedback from Veolia**

Scope 3:

what to disclose and how often update ?

ESRS E1

Climate change

DR 6 - GHG emissions

1 Gov.

2 Strategy

3 IRO

4 Metrics & targets

“Scope 3 GHG emissions may be the main component of their GHG inventory and are an important driver of the undertaking’s transition risks

Methodology for Scope 3 emissions

Not all categories of Scope 3 are needed

The disclosure of gross Scope 3 GHG emissions required shall include GHG emissions in metric tonnes of CO₂eq **from each significant Scope 3 category** (i.e. each Scope 3 category that is a priority for the undertaking).

Step 1: screen its total Scope 3 GHG emissions based on the 15 Scope 3 categories

Step 2: identify its significant Scope 3 categories based on the **magnitude of their estimated GHG emissions** and other criteria provided by GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, p. 61 and 65-68) or ISO 14064-1:2018 Annex H.3.2, such as financial spend, influence, related transition risks and opportunities or **stakeholder views;**

Step 3: calculate or estimate GHG emissions in significant Scope 3 categories using suitable emissions factors;

Greenhouse Gas Protocol (GHGP)

GHGP provides the most widely used greenhouse gas accounting standards and guidance for companies



Corporate



Corporate Value Chain / Scope 3
Version 2011



Scope 2

Alternatively, screening can be based on the categories provided by **ISO 14064:2018**

DR 6 - How often a company has to update Scope 3 ?

How often to update Scope 3 ?

Every year for significant category

“**update** Scope 3 GHG emissions **in each significant category** every year on the basis of current activity data”

At least every three years or on the occurrence of a significant event for the full Scope 3

“**update** the full Scope 3 GHG inventory at least every three years or on the occurrence of a significant event or a significant change in circumstances

Definition

Significant event or significant change in circumstances can, for example, relate to:

- changes in the undertaking's activities or structure,
- changes in the activities or structure of its value chain(s),
- a change in calculation methodology or in the discovery of errors

Operational control:

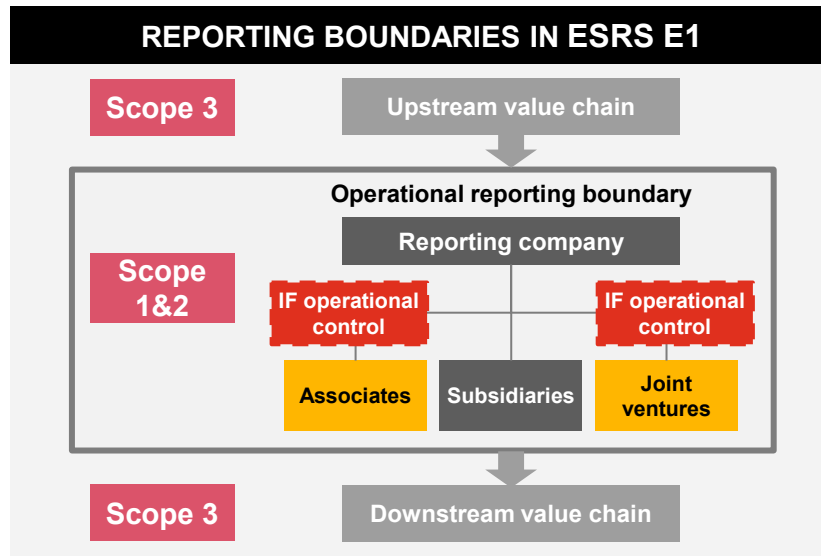
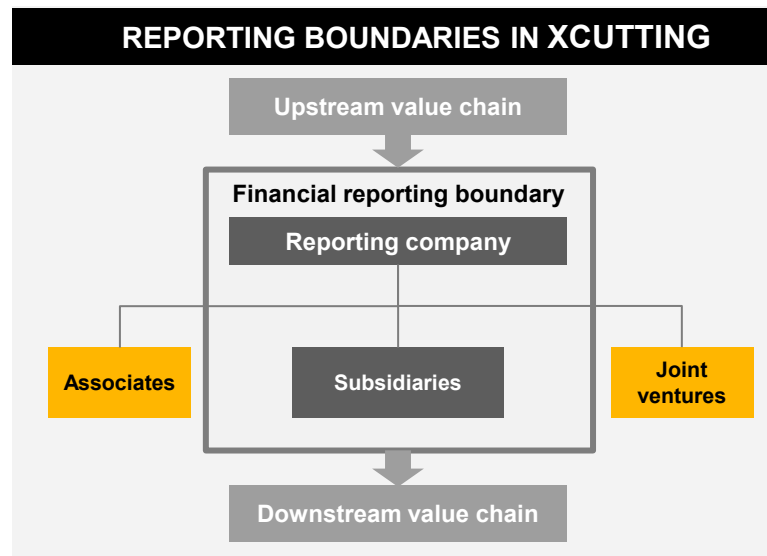
How to allocate GHG for JV, unconsolidated entities etc.

ESRS E1

Climate change

Introduction - what reporting boundary would you consider?

Operational control - simplified presentation



Associates and joint ventures may form part of the upstream or downstream **value chain**

Scope 1&2 emissions of **associates and joint ventures*** for which the company has **operational control** must be included in the **company's scope 1&2 emissions**

*as well as unconsolidated subsidiaries (investment entities), jointly controlled operations and assets not subject to full consolidation

How is operational control defined in ESRS E1?

ESRS E1

Operational control (over an entity, site, operation or asset) is the situation where the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation or asset.

Where does the concept of operational control come from? → GHG protocol



Equity share and financial control approaches are not reflected in ESRS E1

Substances of concern and

Substances of very high concern

ESRS E2

Pollution

DR 5 - Substances of concern and substances of very high concern

The undertaking shall disclose information on the **production, use, distribution, commercialisation and import/export** of substances of concern and substances of very high concern, on their own, in mixtures or in articles.

Disclose separately for:



Substances of concern

Substances of very high concern

total amounts of **substances of concern** that are **generated** or used during the production or that are procured, and the total amounts of substances of concern that **leave its facilities** as emissions, as products, or as part of products or services split into main hazard classes of substances of concern.

The undertaking shall present **separately information** related to substances of very high concern (SVHC)

How to disclosure according the application requirement:

AR 34. The volume of pollutants shall be presented in mass units, for example tonnes or kilogrammes or other mass units appropriate for the volumes and type of pollutants being released.

Substances of concern

REACH & CLP* regulation

Substances of very high concern

REACH regulation

**Classification, Labelling and Packaging*

*In order for the information to be complete, substances in the undertaking's own operations and those procured shall be included (e.g., **embedded in ingredients, semi finished products, or the final product**).*

Water indicators

ESRS E3

Water

Context

Water and marine resources standard's key definitions

Area at water risk

Such areas cover several **physical aspects** related to water :

Availability

Quality

Quantity
Incl.

Accessibility

Regulatory or
reputational issues

Area of high-water stress

% total water withdrawn

- High (40-80%)*
- Extremely high (>80%)*

*in the World Resources Institute's (WRI) **Water Risk Atlas tool Aqueeduct**

Overall Water Risk



■ No data

DR 4 - KPIs required

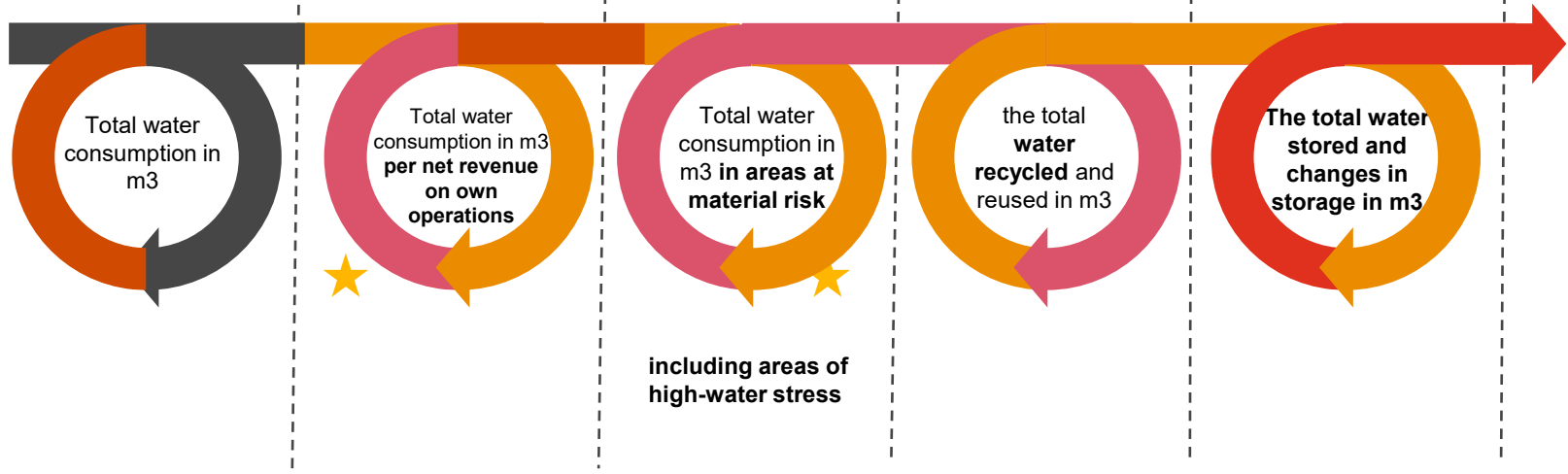
1 Gov.

2 Strategy

3 IRO

4 Metrics & targets

The undertaking shall disclose on its own operation:



The undertaking **may** provide information on other breakdowns (i.e., per sector or segments)



Resources inflows

ESRS E5 Circular Economy

ESRS E5 - DR E5-4: Resource inflows

Resource inflows metrics

Definition of resource inflows

A description of its **resource inflows, where material**, used in the undertaking's own operations and along the value chain

- **Products and materials** (including packaging and specifying critical raw materials and rare earths)
- **Water**
- **Property, plant and equipment**

*Resource inflows indicators refer to all **products and materials** used for production and packaging of products and services... These products and materials could include:*

Materials

- **Raw materials:** natural resources used for conversion to products or services, such as ores, minerals, and wood
- **Associated process materials:** materials that are needed for the manufacturing process but are not part of the final product, such as lubricants for manufacturing machinery
- **Semi-manufactured goods or parts:** All forms of materials and components other than raw materials that are part of the final product



Products



Packaging

- Including paper, cardboard and plastics

ESRS E5 - DR E5-4: Resource inflows

1 GOV

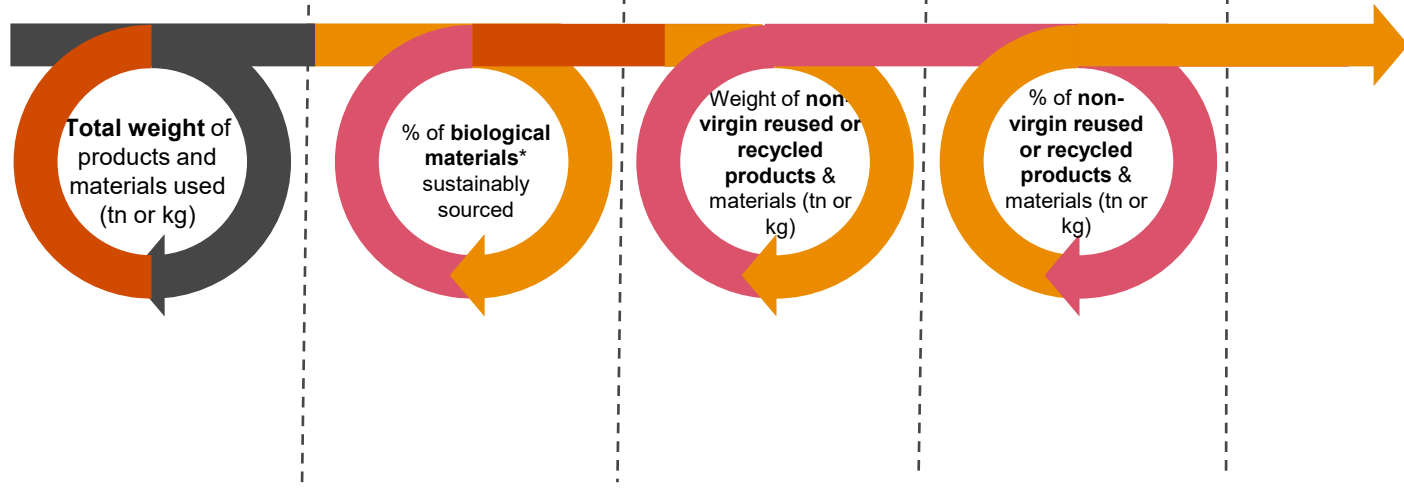
2 SBM

3 IRO

4 Metrics & targets

Resource inflows metrics

The undertaking shall disclose about the materials used to manufacture its products and services :



The undertaking **may** provide information on other breakdowns (i.e., sourcing from by-products/waste)

* Including biofuels used for non-energy purposes and packaging

Biodiversity metrics

ESRS E4

Biodiversity

ESRS E4 – DR 5 – Impact metrics

How to report on biodiversity?

1 GOV

2 SBM

3 IRO

4 Metrics & targets

Different levels of obligation for biodiversity metrics

Whenever biodiversity is material – if sites in/near biodiversity-sensitive areas

The undertaking shall disclose **the number and area (hectares) of sites** owned, leased or managed **in or near protected/key biodiversity areas**

If direct contribution to land-use change, fresh-water use change and/or sea-use change

The undertaking shall report relevant metrics. It may disclose metrics that measure conversion over time of land cover, changes over time in the management of ecosystems, changes in the spatial configuration of the landscape,...

How to create relevant metrics and targets?

- CSRD recommended and mentioned many frameworks and tools in its previous version :
 - To carry out the materiality analysis and identify material pressures, the ENCORE tool can be used (open -source, UNEP);
 - TNFD for more operational guidance on how to evaluate impacts, dependencies, risks & opportunities and financial effects;
 - SBTN for operational guidance on how to set targets;
 - Open-source tools that can facilitate analysis for ESRS E4: Exiobase, GLOBIO, WWF Risk Filter Suite, etc.
- DRs often allow for the **use of estimates or secondary data rather than direct measurements**
 - ✓ Geospatial data layers
 - ✓ Model-based approach for measuring ecosystem level indicators

#Interview

#Question

- Compte tenu du double rapport des entreprises à la biodiversité - à la fois en termes d'impacts et de dépendances, quelles démarches pour mettre en place un reporting ?

Jean-Pierre Maugendre,
Nature and Biodiversity VP, Veolia

