



6 January 2024

Executive Vice-President for Clean, Just and Competitive Transition  
Ms Teresa Ribera

Executive Vice-President for Prosperity and Industrial Strategy  
Mr Stéphane Séjourné

Commissioner for Financial Services and the Savings and Investments Union  
Ms Maria Luís Albuquerque

Commissioner for Implementation and Simplification  
Mr Valdis Dombrovskis

CC: DG FISMA Director General Mr John Berrigan, DG CLIMA Director General Mr Kurt Vandenberghe, DG JUST Director General Ms Ana Gallego

**Subject:** CSRD-CSDDD-Taxonomy > Our position on the Omnibus

Dear Executive Vice-President Ribera,  
Dear Executive Vice-President Séjourné,  
Dear Commissioner Albuquerque,  
Dear Commissioner Dombrovskis,

On behalf of the Collège des Directeurs du Développement Durable (C3D), an organization representing over 400 Chief Sustainability Officers of French companies, we wish you great success in advancing the European Commission's agenda. Your leadership comes at a pivotal moment, as European companies face unprecedented environmental challenges and rising foreign competition amid increasing protectionism.

In the context of the ongoing informal consultations on the drafting of the omnibus regulations for the CSRD, CSDDD, and the Environmental Taxonomy, we, the French Sustainability Officers responsible for implementing these regulations, urge you to uphold the original intent of the co-legislators and the broader Green Deal agenda. Below, we outline our recommendations and provide further details in the annexes to this letter.

The primary challenge of the CSRD lies in its comprehensiveness, which has generated legitimate concerns, particularly from companies transitioning from no ESG accountability to stringent sustainability requirements. However, this



comprehensiveness is also its strength, positioning European companies to develop robust ESG strategies and enhance their competitiveness globally, particularly vis-à-vis non-European companies.

To maximize the potential of these regulations without falling into bureaucratic inefficiency, we recommend a gradual implementation **that keeps the very substance of the current legislative acts** and allows businesses to focus on strategic priorities but starting with clear and simplified communication of the requirements.

Indeed, the ESG reporting and value chain assessment required by these regulations are essential for resilience. By conducting double materiality analyses, the 42,500 companies subject to the CSRD can identify, assess, and prioritize their impacts while preparing for risks linked to climate change, environmental challenges, and geopolitical tensions. These measures are strategic necessities for survival, growth, and long-term competitiveness.

Sustainability regulations not only ensure a level playing field but also **strengthen European sovereignty**. A study by EcoVadis highlights that Western Europe leads in Corporate Sustainability Reporting. Maintaining this leadership requires firm and consistent application of the CSRD, ensuring that European standards shape global norms rather than ceding control to competing frameworks from the U.S. or Asia. Postponing or diluting these regulations would undermine European competitiveness and give strategic advantages to foreign standards.

Furthermore, many companies have already made significant progress in aligning with these frameworks. A moratorium or rollback risks fostering a culture of delay rather than encouraging further adoption. The phased introduction of the CSRD has been carefully designed to foster a virtuous cycle of compliance. Adding obligations to act (as introduced in the CSDDD) reinforces the progress made on obligations to disclose, ensuring sustainable practices become entrenched across supply chains.

Claims that the CSRD, CSDDD, and Taxonomy are overly burdensome and detrimental to European competitiveness often come from stakeholders who have not engaged deeply with the texts. As sustainability officers for large and medium-sized French companies, we have studied these regulations thoroughly.

Key clarifications from the Commission shall remind that **companies only need to report on material items**, which are far fewer than the 850 potential data points.

The legal burden is not shifted to SMEs; larger companies can use a simplified Voluntary Standards for SMEs and **report on supplier engagement at the end of the three-year transition period**.





### **Recommendations for the Omnibus Regulations:**

We advocate practical measures to improve the clarity and effectiveness of these regulations without compromising their strategic objectives:

- Simplify the communication of the requirements before revising the texts themselves.
- Support companies with resources and guidance to ensure compliance while maintaining competitiveness.
- Uphold the phased approach and thresholds to encourage widespread adoption and avoid delays.

We remain fully available to engage with the Commission's services and offer our support in this simplification effort, provided it does not lead to deregulation. Simplification must enhance understanding, not weaken the foundations of these critical frameworks.

The CSRD, CSDDD, and Taxonomy are essential tools to ensure European companies are prepared for ESG risks and can thrive in a competitive global economy. By adhering to these standards, Europe sets the stage for resilience, sovereignty, and sustainable growth. Let us continue to champion these regulations as instruments for long-term strategic success.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Fabrice Bonnifet', written over a faint blue circular stamp.

Fabrice Bonnifet,  
CSR Director of Bouygues and Chairman of the Board of C3D,  
on behalf of the CSR Directors of Bouygues, EDF, Amundi, l'Oréal,  
Carrefour, Véolia, Lagardère... see full list [here](#)

[fabo@bouygues.com](mailto:fabo@bouygues.com)  
+33 6 60 34 25 19



**ANNEX: Recommendations for the Omnibus Regulations: CSRD, CSDDD and Environmental Taxonomy Regulation.**

No.	Proposal	Description	Impact
<b>Simplify parts of CSRD, CS3D and Taxonomy</b>			
1.	Enhance collaboration between EFRAG, the Platform on Sustainable Finance (PSF), and other public-private standard-setting bodies to ensure consistency and reduce redundancies across the CSRD, CSDDD, and Taxonomy frameworks.	The Commission should establish a dedicated forum that brings together EFRAG, the Platform on Sustainable Finance (PSF), and the relevant European Commission departments responsible for developing CSDDD delegated acts. This forum would facilitate collaboration, ensure alignment, and streamline the implementation of sustainable finance regulations.	Ensure better consistency and avoid redundancies across legislative frameworks while upholding the principles of the Better Law Making Agreement, particularly regarding stakeholder consultation and engagement.
2.	Delay the obligation for auditing sustainability data by one year for large companies with fewer than 750 employees	Introduce a new mid-cap category with a similarly postponed audit timeline, ensuring that the content of applicable standards remains largely intact, focusing on targeted simplification where necessary	This adjustment will provide smaller large companies with sufficient time to prepare mock sustainability statements that fully incorporate double materiality principles and allow the EU audit market to adequately prepare for the expanded requirements.
3	Simplify the ESRS requirements for companies with fewer than 750 employees and 50 million	Retain the double materiality analysis but applying a lighter version of the standards, such as the listed SME, for	This approach will facilitate the inclusion of smaller companies by aligning compliance costs with their available resources and ensuring adherence to the proportionality principle advocated by the CSRD.



	turnover or 25 million on the balance sheet.	companies with 250 to 750 employees	
4	Introduce effective sanctions for CSRD / CSDDD / Taxonomy non-compliance	<p>Begin with blank audits in the first year without publishing assurance, followed by penalties for companies failing to meet reporting obligations, as seen in the CS3D framework.</p> <p>Additionally, establish incentives for exemplary reporters through a collaborative process with businesses. Companies (e.g. on the model of the positive list to be published by the Commission of compliant non-EU companies).</p>	Ensure corporate action. No sanctions, no action. Once you've explained the why and the how, you can move on to sanctioning and non financial incentives which are the only ways companies will really act.
5	Review taxonomy requirements for less concerned companies	<ul style="list-style-type: none"> <li>- Taxonomy is an essential common language but for companies requiring little or no capital investment, it is quite burdensome and not helpful for strategic decision making, especially as the calculation of the ratio does not use methodologies that are already in place in all companies</li> <li>- For those companies, let's reassess taxonomy requirements</li> </ul>	- This would keep the reason-why of taxonomy for targeted companies while leaving more room to focus on CSRD and action plans for the others
6	Bring forward the deadline for	Bring forward the deadline for third-	Immediate answer to increased tariffs to come > protect





	third-country companies	<p>country companies by two years (2027 instead of 2029)</p> <p>Make it a licence to operate in the European Union and/or impose sanctions</p>	<p>European companies from foreign environmental and social dumping, while European companies maintain their lead (one or two years) on these issues</p> <p>Proof given that the EU is protecting the interests of its companies thus reinforcing the attachment to regulation</p>
<b>Far better communicate on the Directives (simplify understanding before simplify content)</b>			
7	Enhance communication to clearly explain the purpose and content of the law	<p>Develop "reader-friendly digests" of all directives that non-legal experts can easily understand. These should be tailored for and co-developed with end-users in companies. Existing resources, such as EFRAG's Q&amp;As, are often inaccessible and unappealing in terms of usability. Consider offering these digests in multiple languages and formats, including chatbots, apps, social media content, or short books with infographics. The "CSRD Essentials" by Pascal Durand and Abrial Gilbert-d'Halluin could serve as inspiration. The Commission's Q&amp;A and EFRAG's guidelines are still not very digestible for the smallest large undertakings.</p>	<p>Emphasize the "why" behind the regulations to implementers, helping them understand the intention to streamline and rationalize reporting standards rather than add unnecessary burdens. This approach fosters a constructive mindset, motivating companies to embrace the changes and engage their teams positively.</p> <p>Proactively address misunderstandings that could lead to unwarranted criticism, even from high-profile figures. For example, clarify that the CSRD is not "over-transposed" and that the perceived burden of 1,000+ data points or undue SME exposure is unfounded, as the legislation explicitly protects SMEs.</p>



		Appoint spokespersons to actively engage with the media and dispel misconceptions about European directives, correcting false information and fostering trust.	
8	Emphasize the progressive nature of the CSRD	<p>Clearly communicate to all stakeholders, including users and auditors, that full compliance is not expected in the first year. Companies should focus on their most critical priorities initially and progressively address other areas over time, with a clear rationale for the prioritization.</p> <p>Train auditors to adopt a supportive, coaching-oriented approach rather than acting as enforcers. This mindset shift will help guide companies through the compliance process rather than discourage them.</p>	<p>Ensure that targets are perceived as “SMART” (Specific, Measurable, Achievable, Relevant, and Time-bound). For example, by emphasizing that initial efforts are achievable, companies are more likely to engage positively. Ensuring that efforts are relevant—focusing on the most strategic IROs (Important Reportable Outcomes)—will also boost motivation and operational effectiveness. Today auditors tend to ask for over-reporting and very high audit costs, which leads to push back from companies.</p> <p>Address the current tendency for auditors to demand over-reporting and impose excessive audit costs, which often lead to resistance from companies. Encouraging proportional and focused reporting will reduce pushback and foster a more collaborative compliance environment.</p>
9	Communicate on the existing mechanisms to protect SMEs for excessive demands from	Remind companies subject to the CSRD of the 3-year transition period, during which they are only required to demonstrate that they have asked	Develop and mandate a harmonized ESG questionnaire on top of the VSME standards, such as a VSME questionnaire, for companies to use with their SME suppliers.



	larger companies	suppliers for the necessary information, without an obligation to obtain it if suppliers are unable to provide it.	This approach will immediately reduce compliance setbacks, foster support and engagement from SMEs, and provide practical evidence of the EU's commitment to simplifying and enhancing the usability of its legislation. A standardized questionnaire would benefit both SMEs and larger companies, streamlining the process and demonstrating the proportionality and practicality of the regulations.
--	------------------	--	---