

Amended ESRS - Exposure Draft 2025

A public consultation issued by EFRAG
Comments from ACCA to EFRAG

26 September 2025

REF: TECH-CDR-2272

About ACCA:

We are ACCA (the Association of Chartered Certified Accountants), a globally recognised professional accountancy body providing qualifications and advancing standards in accountancy worldwide.

Founded in 1904 to widen access to the accountancy profession, we've long championed inclusion and today proudly support a diverse community of over 252,500 members and 526,000 future members in 180 countries.

Our forward-looking qualifications, continuous learning and insights are respected and valued by employers in every sector. They equip individuals with the business and finance expertise and ethical judgment to create, protect, and report the sustainable value delivered by organisations and economies.

Guided by our purpose and values, our vision is to develop the accountancy profession the world needs. Partnering with policymakers, standard setters, the donor community, educators and other accountancy bodies, we're strengthening and building a profession that drives a sustainable future for all.

Find out more at: www.accaglobal.com

For further enquiries please contact:

Sharon Machado

Head of Sustainable Business

Sharon.Machado@accaglobal.com

Joe Fitzsimons

Regional Lead Policy and Insights – EEMA & UK

Joe.Fitzsimons@accaglobal.com

GENERAL COMMENTS

ACCA welcomes the opportunity to respond to EFRAG's consultation on the amended ESRS exposure draft. The proposed amendments represent progress towards simplification of the ESRS and enhanced interoperability with the IFRS Sustainability Disclosure Standards.

Alignment with the IFRS Sustainability Disclosure Standards

We acknowledge that EFRAG is proposing a number of changes with the aim to achieve a higher level of interoperability with the IFRS Sustainability Disclosure Standards. The alignment between the ESRS and the IFRS Sustainability Disclosure Standards is fundamental to the consistency and comparability of reporting around the world, and to the usefulness of information to stakeholders. It is also important in order to minimise the reporting and cost burden for those businesses that may need comply with both sets of standards.

ACCA has consistently advocated for a global approach to the development of sustainability disclosure standards, and we fully support the role of ISSB in setting a consistent and comparable global baseline to sustainability reporting around the world. We advocate for a clear building block approach for the ESRS, using the IFRS Sustainability Disclosure Standards as a baseline. We recognise that Europe's Green Deal may necessitate some further requirements and therefore the ESRS would require additional disclosures.

As a minimum, the revised ESRS's should not reduce the current level of interoperability with the IFRS Sustainability Disclosure Standards as this would result in further fragmentation, risking inter-jurisdictional diversity in practice, reducing global comparability and resulting in increased reporting burdens.

We therefore welcome the areas outlined in the consultation that aim to increase interoperability but urge EFRAG to consider whether further alignment is possible. We encourage EFRAG to progress towards equivalence. Ideally, compliance with ESRS should automatically mean compliance with the IFRS Sustainability Disclosure Standards.

Simplification of the Standards

We recognise the review undertaken by EFRAG of the least relevant datapoints and the subsequent reduction in the number of mandatory and voluntary datapoints. We appreciate that this was done with the ambition to not undermine interoperability or prejudice materiality assessments.

We support the removal of information that is not strictly necessary to meet disclosure objectives. We believe in the prioritisation of disclosing information that is relevant and decision useful, firstly, to primary users making decisions about providing resources to the

organisation, and then satisfy other stakeholders' needs. We highlight the need to weigh the decision-usefulness of information to the intended audience against the effort required to report it. Burdening reporting entities with overly prescriptive reporting requirements may be at the cost of them progressing towards more sustainable business models. We therefore commend EFRAG for launching a cost-benefit analysis alongside this public consultation.

We believe that disclosure standards and frameworks need to: be principles-based and developed with proportionality in mind to allow for some flexibility in their requirements. This is to meet the unique needs and circumstances of various organisations and their stakeholders. Care is also needed to determine the appropriate level of granularity for information used in reporting. Certain granular information may serve only niche groups of users, while being potentially beyond the needs of the majority of primary users of general purpose financial reports. We acknowledge the substantial reduction in mandatory and voluntary datapoints outlined in the consultation.

Our [Principles of Good Corporate Reporting](#) provides further insights for policymakers, standard-setters and regulators on sustainability reporting.

Our response to the EFRAG [consultation on the ESRS Set 1 Revision](#) in May 2025 is consistent with the points made in this response.