

EFRAG Use Test Focus Group on ESRS

Background

As part of its due process, EFRAG has set up a Use Test Focus Group ('UTFG') to enable it to gather views from preparers on its first set of exposure drafts for European Sustainability Reporting Standards ('ESRS') on 29 April 2022 available [here](#)¹. Preparers who partake in the UTFG are requested to complete a questionnaire on the operational and other challenges when reporting under the draft ESRS.

The questionnaire contains the following modules:

- General, strategy, governance and materiality assessment (ESRS 2);
- Climate change module (Covering ESRS E1);
- Other environmental matters module (Covering other E standards);
- Social module (Covering the S standards); and
- Governance module (Covering the G standards).

The application of ESRS 1 *General principles* form part of the consideration of the modules.

Preparers can select any module (or multiple ones) when answering the questionnaire. Mocked-up sections of sustainability statements would be very welcome but are not required.

After analysis of the responses, the results will be discussed at workshops jointly with other preparers that participate to the use test focus discussion to validate the outcomes from the use test as well as ensure a full understanding of responses. The workshops are planned for early July 2022. The results from the UTFG will then be presented to the EFRAG SR Board and SR TEG.

EFRAG is looking for participants that allow for a balanced coverage of:

- countries in the European Economic Area, sectors, size;
- preparers with experience with Non-financial reporting directive ('NFRD') as they already prepare sustainability reports being in scope of the NFRD;
- preparers who are not currently preparing reporting under the NFRD but will be in the scope of the Corporate Sustainability Reporting Directive (CSRD).

For further information, please contact Fredre Ferreira (fredre.ferreira@efrag.org).

Please complete the selected modules for this questionnaire by 30 June 2022.

¹The Cover Note to the consultation explains in more detail the context and the process including the responsibilities of the PTF -ESRS and the EFRAG Sustainability Reporting Board; the key features of the EDs and the objectives and practical aspects of the public consultation. The Appendices address various other aspects.

Section A - General questions

1) Personal information*:

First name: _____

Last name: _____

E-mail: _____

Role in the organisation: _____

Name of your company: _____

Industry of your company: _____

Country of head office: _____

Is your company you listed? _____

2) Please indicate the market capitalisation/equity of your company or whether your company is a listed SME*:

- Less than 500.000.000 €
- Between 500.000.000 and 1.000.000.000 €
- More than 1.000.000.000 €
- SME listed in EU regulated markets
- Not listed

3) Please indicate the average number of employees of your company, if it is not listed:

- Between 250 and 500
- More than 250.

4) Please indicate whether you want to be contacted for any follow-up questions*:

- Yes, I want to be contacted.
- No, I do not want to be contacted.

5) Please indicate whether you currently provide the information required by NFDR or not*:

- Yes, we currently prepare NFDR information.
- No, we do not currently prepare NFDR information.

(6) Please indicate which module(s) you will respond to in this questionnaire*:

- General, strategy, governance and materiality assessment
- Climate change
- Other environmental matters
- Social
- Governance

* Denotes that the information has to be provided.

Module 1 – General, strategy, governance and materiality assessment

The Exposure Draft for the draft ESRS 2 General, strategy, governance and materiality assessment contains 22 disclosure requirements and related application guidance. Please answer the following questions in relation draft ESRS 2 (considering both main text in the standard and application guidance).

1.1) When considering the disclosure requirements covered by this module, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

- Unavailability of data
- Inadequate data quality
- Inadequate IT systems
- Excessive cost
- Lack of skills
- Inadequate controls
- Timely completion of the statement
- Other
- None of the above, the requirements can be implemented with a normal level of costs and efforts
- the difficulties are expected to be lower with adequate implementation lead time.

Comments – (please also indicate if this is more pertinent to some Disclosure Requirements or data points; if applicable please refer to the relevant Disclosure Requirement(s) and/or to the paragraphs in main body of the standard or application guidance); if applicable please indicate your expected lead time for the last item)

1.2a) Please indicate whether your concerns relate to narrative or quantitative information (please refer to the relevant Disclosure Requirement(s) and/or relevant paragraphs in the main body of the standard or application guidance).

1.2b) Please also indicate whether your concerns relate to information about your own operations or that of the value chain (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

1.3) In your assessment, can the disclosure requirements in this module be verified/assured?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

1.4) In your assessment, does the disclosure requirements in this module reach a reasonable cost/benefit balance

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

1.5) Please explain why the cost/benefit balance would be unreasonable and/or what particular benefit this disclosure requirement offers (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

1.6) Is the guidance sufficiently clear and understandable to allow for appropriate and consistent application (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?:

1.7) If relevant, please detail the topics where additional guidance is required and explain why in your opinion the guidance provided is insufficient or not sufficiently clear.

1.8) ESRS 2 General, strategy, governance and materiality assessment includes 22 mandatory disclosure requirements, which have to be reported following the application guidance in appendix B to the [draft] standard. ESRS 1 paragraph 57 allows an undertaking to omit information that it assesses, based on reasonable and supportable evidence, as not material based on its specific facts and circumstances. The undertaking shall establish explicit thresholds and/or criteria to support such assessment. When relevant, such materiality assessment may be performed at a higher level than the individual Disclosure Requirement, such as for all of the mandatory disclosures of an entire ESRS, or for a group of Disclosure Requirements related to a specific aspect covered by an ESRS. ESRS 2 paragraph 77 (c) requires disclosing the ESRS or group of Disclosure Requirements that are omitted and the reasoning for omitting them.

Please provide your comments on the application of the materiality assessment of paragraph 57 of ESRS 1 to the disclosures in this module. What specific challenges did you encounter?

Comments:

1.9) What is your expectation on the percentage of data points in the exposure draft that you can omit based on paragraph 57 of ESRS 1? Please explain.

1.10) Please refer to:

- a) ESRS 2 Disclosure Requirement 2-IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities;
- b) ESRS 2 Disclosure Requirement 2-IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS;
- c) Disclosure Requirement 2-IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level).

Please provide your comments on the application of IRO 1, 2 and 3 to this module (do not cover ESRS 2 par. 77 (c) as it is already covered above). What specific challenges did you encounter in performing the materiality assessment for IROs? And in reporting for its process and outcomes?

Module 2 – Climate change

The Exposure Draft for the draft ESRS E1 Climate change contains 17 disclosure requirements and related application guidance. Please answer the following questions in relation draft ESRS E1 (considering both main text in the standard and application guidance).

2.1) When considering the disclosure requirements covered by this module, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

- Unavailability of data
- Inadequate data quality
- Inadequate IT systems
- Excessive cost
- Lack of skills
- Inadequate controls
- Timely completion of the statement
- Other
- None of the above, the requirements can be implemented with a normal level of costs and efforts
- the difficulties are expected to be lower with adequate implementation lead time.

Comments – (please also indicate if this is more pertinent to some Disclosure Requirements or data points; if applicable please refer to the relevant Disclosure Requirement(s) and/or to the paragraphs in main body of the standard or application guidance); if applicable please indicate your expected lead time for the last item)

2.2a) Please indicate whether your concerns relate to narrative or quantitative information (please refer to the relevant Disclosure Requirement(s) and/or relevant paragraphs in the main body of the standard or application guidance).

2.2b) Please also indicate whether your concerns relate to information about your own operations or that of the value chain (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

2.3) In your assessment, can the disclosure requirements in this module be verified/assured?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

2.4) In your assessment, does the disclosure requirements in this module reach a reasonable cost/benefit balance

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully

No opinion

2.5) Please explain why the cost/benefit balance would be unreasonable and/or what particular benefit this disclosure requirement offers (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

2.6) Is the guidance sufficiently clear and understandable to allow for appropriate and consistent application (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance):

2.7) If relevant, please detail the topics where additional guidance is required and explain why in your opinion the guidance provided is insufficient or not sufficiently clear.

2.8) ESRS E1 Climate change includes 17 mandatory disclosure requirements, which have to be reported following the application guidance in appendix B to the [draft] standard. ESRS 1 paragraph 57 allows an undertaking to omit information that it assesses, based on reasonable and supportable evidence, as not material based on its specific facts and circumstances. The undertaking shall establish explicit thresholds

and/or criteria to support such assessment. When relevant, such materiality assessment may be performed at a higher level than the individual Disclosure Requirement, such as for all of the mandatory disclosures of an entire ESRS, or for a group of Disclosure Requirements related to a specific aspect covered by an ESRS. ESRS 2 paragraph 77 (c) requires disclosing the ESRS or group of Disclosure Requirements that are omitted and the reasoning for omitting them.

Please provide your comments on the application of the materiality assessment of paragraph 57 of ESRS 1 to the disclosures in this module. What specific challenges did you encounter?

Comments:

2.9) What is your expectation on the percentage of data points in the exposure draft that you can omit based on paragraph 57 of ESRS 1? Please explain.

2.1) Please refer to:

- d) ESRS 2 Disclosure Requirement 2-IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities;
- e) ESRS 2 Disclosure Requirement 2-IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS;
- f) Disclosure Requirement 2-IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level).

Please provide your comments on the application of IRO 1, 2 and 3 to this module (do not cover ESRS 2 par. 77 (c) as it is already covered above). What specific challenges did you encounter in performing the materiality assessment for IROs? And in reporting for its process and outcomes?

Module 3 – Other environmental matters

The Exposure Drafts for the draft ESRS E2 Pollution, E3 Water and marine resources, E4 Biodiversity and ecosystems as well as E5 Resource use and circular economy contain 33 disclosure requirements and the related application guidance. Please answer the following questions in relation to the draft ESRS E2, E3, E4 and E5 (considering both main text in the standard and application guidance).

3.1) When considering the disclosure requirements covered by this module, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

- Unavailability of data
- Inadequate data quality
- Inadequate IT systems
- Excessive cost
- Lack of skills
- Inadequate controls
- Timely completion of the statement
- Other
- None of the above, the requirements can be implemented with a normal level of costs and efforts
- the difficulties are expected to be lower with adequate implementation lead time.

Comments – (please also indicate if this is more pertinent to some Disclosure Requirements or data points; if applicable please refer to the relevant Disclosure Requirement(s) and/or to the paragraphs in main body of the standard or application guidance); if applicable please indicate your expected lead time for the last item)

3.2a) Please indicate whether your concerns relate to narrative or quantitative information (please refer to the relevant Disclosure Requirement(s) and/or relevant paragraphs in the main body of the standard or application guidance).

3.2b) Please also indicate whether your concerns relate to information about your own operations or that of the value chain (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

3.3) In your assessment, can the disclosure requirements in this module be verified/assured?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

3.4) In your assessment, does the disclosure requirements in this module reach a reasonable cost/benefit balance

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

3.5) Please explain why the cost/benefit balance would be unreasonable and/or what particular benefit this disclosure requirement offers (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

3.6) Is the guidance sufficiently clear and understandable to allow for appropriate and consistent application (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?:

3.7) If relevant, please detail the topics where additional guidance is required and explain why in your opinion the guidance provided is insufficient or not sufficiently clear.

3.8) The other environmental standards (E2 to E5) include 33 mandatory disclosure requirements, which have to be reported following the application guidance in appendix B to the [draft] standard. ESRS 1 paragraph 57 allows an undertaking to omit information that it assesses, based on reasonable and supportable evidence, as not material based on its specific facts and circumstances. The undertaking shall establish explicit thresholds and/or criteria to support such assessment. When relevant, such materiality assessment may be performed at a higher level than the individual Disclosure Requirement, such as for all of the mandatory disclosures of an entire ESRS, or for a group of Disclosure Requirements related to a specific aspect covered by an ESRS. ESRS 2 paragraph 77 (c) requires disclosing the ESRS or group of Disclosure Requirements that are omitted and the reasoning for omitting them.

Please provide your comments on the application of the materiality assessment of paragraph 57 of ESRS 1 to the disclosures in this module. What specific challenges did you encounter?

Comments:

3.9) What is your expectation on the percentage of data points in the exposure draft that you can omit based on paragraph 57 of ESRS 1? Please explain.

3.10) Please refer to:

- a) ESRS 2 Disclosure Requirement 2-IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities;
- b) ESRS 2 Disclosure Requirement 2-IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS;
- c) Disclosure Requirement 2-IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level).

Please provide your comments on the application of IRO 1, 2 and 3 to this module (do not cover ESRS 2 par. 77 (c) as it is already covered above). What specific challenges did you encounter in performing the materiality assessment for IROs? And in reporting for its process and outcomes?

Module 4 – Social

The Exposure Drafts for the draft ESRS S1 Own workforce, S2 Workers in the value chain, S3 Affected communities and S4 Consumers and end-users contain 44 disclosure requirements and related application guidance. Please answer the following questions in relation to the draft social standards (considering both main text in the standard and application guidance).

4.1) When considering the disclosure requirements covered by this module, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

- Unavailability of data
- Inadequate data quality
- Inadequate IT systems
- Excessive cost
- Lack of skills
- Inadequate controls
- Timely completion of the statement
- Other
- None of the above, the requirements can be implemented with a normal level of costs and efforts
- the difficulties are expected to be lower with adequate implementation lead time.

Comments – (please also indicate if this is more pertinent to some Disclosure Requirements or data points; if applicable please refer to the relevant Disclosure Requirement(s) and/or to the paragraphs in main body of the standard or application guidance); if applicable please indicate your expected lead time for the last item)

4.2a) Please indicate whether your concerns relate to narrative or quantitative information (please refer to the relevant Disclosure Requirement(s) and/or relevant paragraphs in the main body of the standard or application guidance).

4.2b) Please also indicate whether your concerns relate to information about your own operations or that of the value chain (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

4.3) In your assessment, can the disclosure requirements in this module be verified/assured?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

4.4) In your assessment, does the disclosure requirements in this module reach a reasonable cost/benefit balance

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

4.5) Please explain why the cost/benefit balance would be unreasonable and/or what particular benefit this disclosure requirement offers (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

4.6) Is the guidance sufficiently clear and understandable to allow for appropriate and consistent application (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?:

4.7) If relevant, please detail the topics where additional guidance is required and explain why in your opinion the guidance provided is insufficient or not sufficiently clear.

4.8) The Social standards include 44 mandatory disclosure requirements, which have to be reported following the application guidance in appendix B to the [draft] standard. ESRS 1 paragraph 57 allows an undertaking to omit information that it assesses, based on reasonable and supportable evidence, as not material based on its specific facts and circumstances. The undertaking shall establish explicit thresholds and/or criteria to support such assessment. When relevant, such materiality assessment may be performed at a higher level than the individual Disclosure Requirement, such as for all of the mandatory disclosures of an entire ESRS, or for a group of Disclosure Requirements related to a specific aspect covered by an ESRS. ESRS 2 paragraph 77 (c) requires disclosing the ESRS or group of Disclosure Requirements that are omitted and the reasoning for omitting them.

Please provide your comments on the application of the materiality assessment of paragraph 57 of ESRS 1 to the disclosures in this module. What specific challenges did you encounter?

Comments:

4.9) What is your expectation on the percentage of data points in the exposure draft that you can omit based on paragraph 57 of ESRS 1? Please explain.

4.10) Please refer to:

- a) ESRS 2 Disclosure Requirement 2-IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities;
- b) ESRS 2 Disclosure Requirement 2-IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS;
- c) Disclosure Requirement 2-IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level).

Please provide your comments on the application of IRO 1, 2 and 3 to this module (do not cover ESRS 2 par. 77 (c) as it is already covered above). What specific challenges did you encounter in performing the materiality assessment for IROs? And in reporting for its process and outcomes?

Module 5 – Governance

The Exposure Drafts for the draft ESRS G1 Governance, risk management and internal control and G2 Business conduct contain 20 disclosure requirements and related application guidance. Please answer the following questions in relation to the draft Governance standards (considering both main text in the standard and application guidance).

5.1) When considering the disclosure requirements covered by this module, please indicate which of the following operational challenges would be relevant in your opinion, if applicable (the items are not mutually exclusive so you can select more than one item):

- Unavailability of data
- Inadequate data quality
- Inadequate IT systems
- Excessive cost
- Lack of skills
- Inadequate controls
- Timely completion of the statement
- Other
- None of the above, the requirements can be implemented with a normal level of costs and efforts
- the difficulties are expected to be lower with adequate implementation lead time.

Comments – (please also indicate if this is more pertinent to some Disclosure Requirements or data points; if applicable please refer to the relevant Disclosure Requirement(s) and/or to the paragraphs in main body of the standard or application guidance); if applicable please indicate your expected lead time for the last item)

5.2a) Please indicate whether your concerns relate to narrative or quantitative information (please refer to the relevant Disclosure Requirement(s) and/or relevant paragraphs in the main body of the standard or application guidance).

5.2b) Please also indicate whether your concerns relate to information about your own operations or that of the value chain (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

5.3) In your assessment, can the disclosure requirements in this module be verified/assured?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance).

5.4) In your assessment, does the disclosure requirements in this module reach a reasonable cost/benefit balance

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

5.5) Please explain why the cost/benefit balance would be unreasonable and/or what particular benefit this disclosure requirement offers (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

5.6) Is the guidance sufficiently clear and understandable to allow for appropriate and consistent application (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?

- Not at all
- To a limited extent with strong reservations
- To a large extent with some reservations
- Fully
- No opinion

Comments (please refer to the relevant Disclosure Requirement and/or relevant paragraphs in the main body of the standard or application guidance)?:

5.7) If relevant, please detail the topics where additional guidance is required and explain why in your opinion the guidance provided is insufficient or not sufficiently clear.

5.8) The Governance standards include 20 mandatory disclosure requirements, which have to be reported following the application guidance in appendix B to the [draft] standard. ESRS 1 paragraph 57 allows an undertaking to omit information that it assesses, based on reasonable and supportable evidence, as not material based on its specific facts and circumstances. The undertaking shall establish explicit thresholds and/or criteria to support such assessment. When relevant, such materiality assessment may be performed at a higher level than the individual Disclosure Requirement, such as for all of the mandatory disclosures of an entire ESRS, or for a group of Disclosure Requirements related to a specific aspect covered by an ESRS. ESRS 2 paragraph 77 (c) requires disclosing the ESRS or group of Disclosure Requirements that are omitted and the reasoning for omitting them.

Please provide your comments on the application of the materiality assessment of paragraph 57 of ESRS 1 to the disclosures in this module. What specific challenges did you encounter?

Comments:

5.9) What is your expectation on the percentage of data points in the exposure draft that you can omit based on paragraph 57 of ESRS 1? Please explain.

5.10) Please refer to:

- a) ESRS 2 Disclosure Requirement 2-IRO 1 - Description of the processes to identify material sustainability impacts, risks and opportunities;
- b) ESRS 2 Disclosure Requirement 2-IRO 2 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities as identified by reference to and in compliance with sector-agnostic and sector-specific level ESRS;
- c) Disclosure Requirement 2-IRO 3 - Outcome of the undertaking's assessment of material sustainability impacts, risks and opportunities that are not covered by an ESRS (entity-specific level).

Please provide your comments on the application of IRO 1, 2 and 3 to this module (do not cover ESRS 2 par. 77 (c) as it is already covered above). What specific challenges did you encounter in performing the materiality assessment for IROs? And in reporting for its process and outcomes?

Thank You!
