

[Draft] ESRS for listed SMEs

Section 4

STATUS OF THIS DRAFT

Editorial review in progress. Still pending:

- Inclusion of a hyperlink after each requirement referencing to the AR that cover that specific requirement
- Check drafting conventions (italics)
- Final check of internal references to paragraph numbers including references to other sections

Text highlighted in **turquoise** illustrates the changes made after the discussion held at SR TEG on 24 of October.

DISCLAIMER

Section 4 *Environment* is set out in paragraphs 1–73. The following appendices of Section 4 have the same authority as the main body of the [draft] Standard:

- *Appendix A: Application Requirements,*

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Objective

1. The objective of the Environmental Disclosures in this [draft] Standard is to provide users of sustainability statements with an understanding of the undertaking's environmental impacts and dependencies and material risks arising from those, the actions taken to address those impacts and risks, strategies for sustainability, and the short-, medium- and long-term financial effects of the material risks. This [draft] Section 4 covers Disclosure Requirements related to the following sustainability matters as per AR 23, Appendix A, Section 1 of this [draft] standard.
2. The objectives in paragraph 1 and the metrics disclosure requirements under Section 4 E1 to E5 shall be read in conjunction with Section 2 and 3 of this [draft], General Disclosures.
3. The undertaking shall apply the requirements in this Section, when it concludes that the corresponding topic is material (according to chapter 3.3 *Double materiality*, 3.4 *Impact materiality* and 3.5 *Financial materiality* of Section 1). In determining which information in this section should be included, the undertaking shall apply:
 - (a) the provisions in paragraph 42 of Section 1 for metrics; and
 - (b) the provisions in paragraph 38 of Section 1, which support also the determination of the details of narrative disclosure to be reported.
4. As defined in Section 1 Chapter 1.3 *Terminological conventions*, in this Section there are some information to be disclosed only in some defined circumstances described in the related requirement.
5. The Disclosure Requirements under E1 to E5 of this Section of the [draft] Standard take into account the requirements of related EU legislation and regulation (i.e., EU Climate Law, Regulation (EU) 2019/2088 (SFDR), Regulation (EU) 2020/852 (the EU Taxonomy), Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), and EBA Pillar 3 ESG risk disclosure requirements).

Climate Change – Disclosure Requirements (E1)

Disclosure Requirement E1-1– Energy consumption and mix

6. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's total energy consumption in absolute value and the share of **renewable energy** in its overall energy mix.
7. The undertaking shall disclose the total energy consumption in MWh related to its own operations and the share (%) from renewable sources¹.
8. Where the undertaking is also an energy producer, it shall disaggregate and disclose separately its non-renewable energy production and renewable energy production in MWh.
9. The undertaking may disclose the breakdown of energy consumption by type of non-renewable sources of energy² (such as from fossil sources).

¹ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 as reflecting a mandatory indicator related to principal adverse impacts as set out by indicator #5 in Table 1 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments ("Share of non-renewable energy consumption and production").

² The breakdown serves as a reference for an additional indicator related to principal adverse impacts as set out by indicator #5 in Table 2 of the same Annex ("Breakdown of energy consumption by type of non-renewable sources of energy").

² The breakdown serves as a reference for an additional indicator related to principal adverse impacts as set out by indicator #5 in Table 2 of the same Annex ("Breakdown of energy consumption by type of non-renewable sources of energy").

Energy intensity based on net revenue³

10. The undertaking shall provide information on the energy intensity (total energy consumption per net revenue) associated with activities in **high climate impact sectors⁴**. The disclosure on energy intensity shall only be derived from the total energy consumption and net revenue from activities in **high climate impact sectors**.
11. The undertaking shall specify the **high climate impact sectors** that are used to determine the energy intensity required by paragraph 10.

Disclosure Requirement E1-2– Gross Scopes 1, 2, 3 and Total GHG emissions

12. The objective of the Disclosure Requirement is to provide an understanding of the direct (Scope 1) and indirect (Scope 2 and 3) impacts of the undertaking on climate change, measured as its GHG emissions to the atmosphere.
13. The undertaking shall disclose its⁶:
 - (c) gross Scope 1 GHG emissions in metric tonnes of CO₂eq;
 - (d) gross location-based Scope 2 GHG emissions in metric tonnes of CO₂eq and, if applicable, the gross market-based Scope 2 GHG emissions in metric tonnes of CO₂eq.;
 - (e) the gross GHG emissions of each significant Scope 3 category, in metric tonnes of CO₂eq.; and
 - (f) total GHG emissions, as the sum of Scope 1, Scope 2 (using the location-based method) and the significant Scope 3 GHG emissions required by paragraphs (a) to (c)

GHG Intensity based on net revenue⁷

14. The undertaking shall disclose its GHG emissions intensity, this is total GHG emissions per net revenue (in metric tonnes of CO₂eq per € million net revenue).

Disclosure Requirement E1-3 – GHG removals and storage projects

15. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's actions to permanently remove GHG from the atmosphere.
16. If the undertaking has developed GHG removals and storage projects within its own operations, or contributed to in its upstream and downstream value chain, it shall disclose the total amount of CO₂eq associated with these projects, as well as the calculation assumptions, methodologies and frameworks applied.

³ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 as reflecting a mandatory indicator related to principal adverse impacts as set out by indicator #6 in Table 1 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments (“Energy consumption intensity per high impact climate sector”).

⁴ High climate impact sectors are those listed in NACE Sections A to H and Section L (as defined in Commission Delegated Regulation (EU) 2022/1288)

⁶ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 as reflecting a mandatory indicator related to principal adverse impacts as set out by indicators #1 and #2 in Table 1 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments (respectively, “GHG emissions” and “Carbon footprint”). This information is aligned with the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Regulation), Articles 5 (1), 6 and 8 (1).

⁷ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #3 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments (“GHG intensity of investee companies”). This information is aligned with Commission Delegated Regulation (EU) 2020/1818 (Climate benchmark Regulation), Article 8 (1).

Pollution – Disclosure Requirements (E2)

Disclosure Requirement E2-1– Pollution of air, water and soil

17. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's pollutants *emissions* to air, *water* and *soil* in its own operations, its generation and use of microplastics and 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.
18. The undertaking shall disclose the amounts of:
- (g) each pollutant emitted to air, **water** and **soil** listed in Annex II of Regulation (EC) 2024/1244 of the European Parliament and of the Council⁽⁶⁶⁾ (Industrial Emissions Portal "IEPR" Regulation) for which the applicable threshold value at facility level is exceeded, with the exception of emissions of **GHGs** which are disclosed in accordance with E1 Climate Change⁽⁶⁷⁾;
 - (a) microplastics generated or used by the undertaking, including in a separate breakdown, the downstream unintentional generation of microplastics from plastics (i.e. unintentionally produced when larger pieces of plastics like car tires or synthetic textiles wear and tear);
 - (b) the total amounts of substances of concern (SOC) 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. In cases where substances of concern are also substances of very high concern (SVHC), the undertaking shall present a breakdown of amounts with respect to SVHC .

Water and Marine Resources - Disclosure Requirements (E3)

Disclosure Requirement E3-1 – Water consumption

19. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's **water consumption**.
20. If the undertaking has production processes in place which significantly consume^[Obj] water (such as thermal energy processes like drying or power production; production of goods, agricultural irrigation, etc), it shall disclose information on water consumption performance in its own operations, including:
 - (a) the total water consumption in m3;
 - (b) total water consumption in m3 in areas at water risk, including areas of high-water stress.
21. The undertaking may provide information on its **water intensity**: total **water consumption** in its own operations in m³ per million EUR net revenue^[Obj].

Biodiversity and ecosystems – Disclosure Requirements (E4)

Disclosure Requirement E4-1 – Impact metrics related to biodiversity and ecosystems change^[Obj]

22. **The objective of this Disclosure Requirement is to enable an understanding of the performance of the undertaking against impacts identified as material in the materiality assessment on biodiversity and ecosystems change.**
23. If the undertaking has identified owned, leased or managed **sites** located in or near **biodiversity-sensitive areas** which are negatively affected (see paragraph 19 (a) in ESRS E4) by the activity of those sites, the undertaking shall disclose the number and area (in hectares) of sites in or near these **protected areas** or key **biodiversity** areas.
24. If the undertaking has concluded that it directly contributes to **impact drivers of biodiversity loss** such as **land-use change, freshwater-use change and/or sea-use change**, it shall disclose relevant metrics. For that purpose the undertaking may consider selecting metrics related to land-use change, freshwater-use change and/or sea-use change based on ESRS E4 paragraph 38 or land use metrics relate to E4 Application Requirement 34.
25. If the undertaking has concluded that it has material impacts on biodiversity, such as impacts on the state of species, impacts on the extent and condition of ecosystems or impacts on ecosystems services to which it has directly contributed to, it may report **metrics** it considers relevant, such as the ones in ESRS E4 paragraph 40 and 41.

Resource use and Circular Economy – Disclosure Requirements (E5)

Disclosure Requirement E5-1 – Resource inflows

26. The objective of this Disclosure Requirement is to enable an understanding of the impacts and risks originating from the resource use in the undertaking's own operations and value chain.
27. The undertaking shall disclose:
 - (a) a description of its material impacts and risks originating from resource inflows used in the undertaking's own operations and along its upstream value chain;
 - (b) the annual mass-flow of relevant materials used for its own operations, including the percentage of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging); and
 - (c) the percentage of secondary material (recycled or reused) used as inflow.

Disclosure Requirement E5-2 – Resource outflows

28. The objective of this Disclosure Requirements is to understand of how the undertaking contributes to **circular economy** through its **waste** reduction and **waste management** strategy.

Products and materials

29. The undertaking shall disclose information on its material resource outflows including a description of the key products and materials that come out of the undertaking's production process that are designed along circular economy principles.

Waste

30. The undertaking shall disclose:
- (a) the total annual generation of waste broken down by type (non-hazardous and hazardous);
 - (b) the total annual waste diverted to recycling or reuse.
31. The undertaking shall also disclose the total amount of radioactive waste generated by the undertaking, where radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom²¹.

Anticipated financial effects from material environmental-related matters – Disclosure Requirements (E6)

32. The objective of this Disclosure Requirement is to provide an understanding of *the anticipated financial effects* to the undertaking due to environmental-related risks. These risks arise from climate change, pollution, water and marine resources, biodiversity and ecosystems and circular economy. As part of the objective, it should be possible to understand how these risks have (or could reasonably be expected to have) a material influence on the undertaking's financial position, financial performance and cash flows over the short-, medium- and long-term.
33. The undertaking shall disclose by environmental topic (climate change, pollution, water and marine resources, ecosystems and biodiversity, and circular economy) a brief description of how the material risks identified in "Disclosure Requirement 7 (SBM-3)" in section 2 of this [draft] standard have (or could reasonably be expected to have) a material influence on the undertaking's financial position, financial performance and cash flows over the short-, medium- and long-term).

Climate change

34. In particular for climate change and in addition to the information on anticipated financial effects required under SBM-3 in Section 2 of this [draft] standard, the undertaking shall disclose^[OBJ]:
- (a) in relation to material **physical risks**:
 - i. proportion (percentage) of assets at material physical risk before considering climate change adaptation actions, disaggregated by acute and chronic physical risk^[OBJ]; and
 - ii. the location of significant assets at material physical risk^[OBJ].

(b) in relation to material transition risks:

²¹ Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48). This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #9 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 regarding disclosure rules on sustainable investments ("Hazardous waste and radioactive waste ratio").

- i. if the undertaking is operating in high-impact sectors, the proportion (percentage) of assets and net revenue from its business activities at material transition risk over the short-, medium- and long-term before considering climate mitigation actions; and
- ii. a breakdown (number of buildings per class) of the undertaking's real estate assets by energy efficiency classes⁽¹⁰⁶⁾ (A to F, or if the building has no energy efficiency rating).

Appendix A: Application Requirements

This Appendix is an integral part of this Section of this [draft] Standard. It supports the application of the requirements set for in paragraphs 1 to 38 and has the same authority as the other parts of this [draft] Standard.

Application Requirement – E1 to E5

AR 1. When preparing the information required to disclose metrics under E1 to E5, the undertaking may disclose the calculation assumptions and limitations, methodologies and frameworks applied by the undertaking and any changes in methodologies made over time and why they occurred. If applicable, it shall also specify whether the data is sourced from direct measurement, from sampling or extrapolation, or estimations.

AR 2. The undertaking may also describe the process and frequency of monitoring the metrics disclosed under E1 to E5.

Application Requirements-Climate Change E1

Disclosure Requirement E1-1 – Energy consumption and mix

Calculation guidance

AR 3. When preparing the information on energy consumption required under paragraph 6 the undertaking shall:

- (c) only report energy consumed from processes owned or controlled by the undertaking applying the same perimeter applied for reporting GHG Scopes 1 and 2 emissions;
- (d) exclude feedstocks and fuels that are not combusted for energy purposes. The undertaking that consumes fuel as feedstocks can disclose information on this consumption separately from the required disclosures;
- (e) ensure all quantitative energy-related information is reported in either Mega-Watt-hours (MWh) in Lower Heating Value or net calorific value. If raw data of energy-related information is only available in energy units other than MWh (such as Giga-Joules (GJ) or British Thermal Units (Btu)), in volume units (such as cubic feet or gallons) or in mass units (such as kilograms or pounds), they shall be converted to MWh using suitable conversion factors (see for example Annex II of the Fifth Assessment IPCC report). Conversion factors for fuels shall be made transparent and applied in a consistent manner;
- (f) ensure all quantitative energy-related information is reported as final energy consumption, referring to the amount of energy the undertaking actually consumes using for example the table in Annex IV of Directive 2012/27 of the European Parliament and of the Council⁽⁶⁶⁾ on energy efficiency;
- (g) avoid double counting fuel consumption when the undertaking generates electricity from either a non-renewable or renewable fuel source and then consumes the generated electricity. In such case, the energy consumption shall be counted only once under fuel consumption;
- (h) not offset energy consumption even if on site generated energy is sold to and used by a third party;
- (i) account for renewable hydrogen⁽⁶⁶⁾ as a renewable fuel. Hydrogen that is not completely derived from renewable sources shall be included under “fuel consumption from other non-renewable sources”; and
- (j) adopt a conservative approach when splitting the electricity, steam, heat or cooling between renewable and non-renewable sources based on the approach applied to calculate market-based Scope 2 GHG emissions. The undertaking shall only consider these energy consumptions as deriving from renewable sources if the

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origin of the purchased energy is clearly defined in the contractual arrangements with its suppliers (renewable power purchasing agreement, standardised green electricity tariff, market instruments like Guarantee of Origin from renewable sources in Europe⁽⁶⁶⁾ or similar instruments like Renewable Energy Certificates in the US and Canada).

AR 4. The information on energy consumption and mix may be presented using the following tabular format.

Energy consumption and mix	Comparative	Year N
(1) Non-renewable energy consumption (MWh)		
(2) Consumption from renewable sources (MWh)		
Total energy consumption (MWh) (calculated as the sum of lines 1 and 2)		

Energy intensity based on net revenue

Calculation guidance

AR 5. When preparing the information on energy intensity required under paragraph 8, the undertaking shall:

(a) calculate the energy intensity ratio using the following formula:

$$\frac{\text{Total energy consumption from activities in high climate impact sectors (MWh)}}{\text{Net revenue from activities in high climate impact sectors (Monetary unit)}}$$

- (b) express the total energy consumption in MWh and the net revenue in monetary units (e.g., Euros);
- (c) the numerator and denominator shall only consist of the proportion of the total final energy consumption (in the numerator) and net revenue (in the denominator) that are attributable to activities in high climate impact sectors. In effect, there should be consistency in the scope of both the numerator and denominator;
- (d) calculate the total energy consumption in line with the requirement in paragraph 6;
- (e) calculate the net revenue in line with the accounting standards requirements applicable for the financial statements, i.e., IFRS 15 Revenue from Contracts with Customers or local GAAP requirements.

AR 6. The quantitative information may be presented in the following table.

Energy intensity per net revenue	Comparative	N	% N / N-1
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/Monetary unit)			

Disclosure Requirements E1-2 – Gross Scopes 1, 2, 3 and Total GHG emissions

Calculation guidance

AR 7. When preparing the information for reporting GHG **emissions** as required by paragraph 12, the undertaking shall:

- (f) consider the principles, requirements and guidance provided by the GHG Protocol Corporate Standard (version 2004). The undertaking may consider Commission Recommendation (EU) 2021/2279⁽⁶⁶⁾ or the requirements stipulated by ISO 14064-1:2018. If the undertaking already applies the GHG accounting methodology of ISO 1:2018, it shall nevertheless comply with the requirements of this standard (e.g., regarding reporting boundaries and the disclosure of market-based Scope 2 GHG emissions);
- (g) disclose the emissions factors used to calculate or measure GHG emissions accompanied by the reasons why they were chosen, and provide a reference or link to any calculation tools used;
- (h) include emissions of CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, and NF₃. Additional GHG may be considered when significant; and
- (i) use the most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO₂eq emissions of non-CO₂ gases.

AR 8. In line with Section 1 chapter 3.7, the undertaking shall disaggregate information on its GHG emissions as appropriate. For example, the undertaking may disaggregate its Scope 1, 2, 3, or total GHG **emissions** by country, operating segments, economic activity, subsidiary, GHG category (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, and other GHG considered by the undertaking) or source type (stationary combustion, mobile combustion, process emissions and fugitive emissions).

AR 9. An undertaking might have a different reporting period from some or all of the entities in its value chain. In such circumstances, the undertaking is permitted to measure its GHG emissions in accordance with paragraph 12 using information for reporting periods that are different from its own reporting period if that information is obtained from entities in its value chain with reporting periods that are different from the undertaking's reporting period, on the condition that:

- (a) the undertaking uses the most recent data available from those entities in its value chain to measure and disclose its greenhouse gas emissions;
- (b) the length of the reporting period is the same; and
- (c) the undertaking discloses the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements.

AR 10. When preparing the information on gross **Scope 1 GHG emissions** required under paragraph 12(a), the undertaking shall:

- (a) calculate or measure GHG emissions from stationary combustion, mobile combustion, process emissions and fugitive emissions; and use suitable activity data that include the non-renewable fuel consumption;
- (b) use suitable and consistent emission factors;
- (c) disclose biogenic emissions of CO₂ from the combustion or biodegradation of biomass separately from the Scope 1 GHG emissions, but include emissions of other types of GHG (in particular CH₄ and N₂O);
- (d) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 1 GHG emissions;
- (e) for activities reporting under the EU ETS, report on Scope 1 emissions following the EU ETS methodology. The EU ETS methodology may also be applied to activities in geographies and sectors that are not covered by the EU ETS;

AR 11. When preparing the information on gross **Scope 2 GHG emissions** required under paragraph 18, the undertaking shall:

- (a) consider the principles and requirements of the GHG Protocol Scope 2 Guidance (version 2015, in particular the Scope 2 quality criteria in chapter 7.1 relating to contractual instruments). It may also consider Commission Recommendation (EU)

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2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from imported energy in EN ISO 14064-1:2018;

- (b) include purchased or acquired electricity, steam, heat, and cooling consumed by the undertaking;
- (c) avoid double counting of GHG emissions reported under Scope 1 or 3;
- (d) apply the location-based, and, if applicable, market-based methods to calculate Scope 2 GHG emissions and provide information on the share and types of contractual instruments. Location-based method quantifies Scope 2 GHG emissions based on average energy generation emission factors for defined locations, including local, subnational, or national boundaries (GHG Protocol, "Scope 2 Guidance", Glossary, 2015). Market-based method quantifies Scope 2 GHG emissions based on GHG emissions emitted by the generators from which the reporting entity contractually purchases electricity bundled with instruments, or unbundled instruments on their own (GHG Protocol, "Scope 2 Guidance", Glossary, 2015); in this case, the undertaking may disclose the share of market-based scope 2 GHG emissions linked to purchased electricity bundled with instruments such as Guarantee of Origins or Renewable Energy Certificates. The undertaking shall provide information about the share and types of contractual instruments used for the sale and purchase of energy bundled with attributes about the energy generation or for unbundled energy attribute claims.
- (e) disclose biogenic emissions of CO₂ from the combustion or biodegradation of biomass separately from the Scope 2 GHG emissions but include emissions of other types of GHG (particularly CH₄ and N₂O). In case the emission factors applied do not separate the percentage of biomass or biogenic CO₂, the undertaking shall disclose this. In case GHG emissions other than CO₂ (particularly CH₄ and N₂O) are not available for, or excluded from, location-based grid average emissions factors or with the market-based method information, the undertaking shall disclose this; and
- (f) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 2 GHG emissions.

AR 12. When preparing the information on gross **Scope 3 GHG emissions** required under paragraph 19, the undertaking shall:

- (a) consider the principles and provisions of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011); and it may consider Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from EN ISO 14064-1:2018;
- (b) if it is a financial institution, consider the GHG Accounting and Reporting Standard for the Financial Industry from the Partnership for Carbon Accounting Financial (PCAF), specifically part A "Financed Emissions" (version December 2022);
- (c) screen its total Scope 3 GHG emissions based on the 15 Scope 3 categories identified by the GHG Protocol Corporate Standard and GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011) using appropriate estimates. Alternatively, it may screen its indirect GHG emissions based on the categories provided by EN ISO 14064-1:2018 clause 5.2.4 (excluding indirect GHG emissions from imported energy);
- (d) identify and disclose 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;
- (e) calculate or estimate GHG emissions in significant Scope 3 categories using suitable emissions factors;
- (f) update Scope 3 GHG emissions in each significant category every year on the basis of current activity data; update the full Scope 3 GHG inventory at least every 3 years or on the occurrence of a significant event or a significant change in circumstances (a significant event or significant change in circumstances can, for

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example, relate to changes in the undertaking's activities or structure, changes in the activities or structure of its upstream and downstream value chain(s), a change in calculation methodology or in the discovery of errors);

- (g) disclose the extent to which the undertaking's Scope 3 GHG emissions are measured using inputs from specific activities within the entity's upstream and downstream value chain, and disclose the percentage of emissions calculated using primary data obtained from suppliers or other value chain partners;

AR 13. disclose a list of Scope 3 GHG emissions categories included in;

- (a) disclose biogenic emissions of CO₂ from the combustion or biodegradation of biomass that occur in its upstream and downstream value chain separately from the gross Scope 3 GHG emissions, and include emissions of other types of GHG (such as CH₄ and N₂O), and emissions of CO₂ that occur in the life cycle of biomass other than from combustion or biodegradation (such as GHG emissions from processing or transporting biomass) in the calculation of Scope 3 GHG emissions;
- (b) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 3 GHG emissions;

AR 14. When preparing the information on the total **GHG emissions** required under paragraph 11d, the undertaking shall apply the following formula to calculate the total GHG emissions (location-based):

$$\begin{aligned} \text{Total GHG emissions}_{\text{location-based}} \text{ (t CO}_2\text{eq)} \\ = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{location-based}} + \text{Gross Scope 3 Total} \end{aligned}$$

AR 15. The undertaking may also disclose total GHG emissions derived from the market-based method while measuring the underlying Scope 2 GHG emissions, using the formula

$$\begin{aligned} \text{Total GHG emissions}_{\text{market-based}} \text{ (t CO}_2\text{eq)} \\ = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{market-based}} + \text{Gross Scope 3} \end{aligned}$$

AR 16. The undertaking may disclose its total GHG **emissions** disaggregated by Scopes 1 and 2, as well as total and/or significant Scope 3 in accordance with the table below.

	Retrospective				Milestones and target years			
	Base year	Compa-rative	N	% N / N-1	2025	2030	(2050)	Annual % target / Base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tCO ₂ eq)								
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)								
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)								
Gross market-based Scope 2 GHG emissions (tCO ₂ eq) (if applicable)								
Significant Scope 3 GHG emissions*								
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)								
1 Purchased goods and services								

Optional sub-category: Cloud computing and data centre services									
2 Capital goods									
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)									
4 Upstream transportation and distribution									
5 Waste generated in operations									
6 Business travels									
7 Employee commuting									
8 Upstream leased assets									
9 Downstream transportation									
10 Processing of sold products									
11 Use of sold products									
12 End-of-life treatment of sold products									
13 Downstream leased assets									
14 Franchises									
15 Investments									
Total GHG emissions									
Total GHG emissions (location-based) (tCO ₂ eq)									
Total GHG emissions (market-based) (tCO ₂ eq)									

* Only significant Scope 3 categories are to be reported.

AR 17. The Scope 3 GHG **emissions** may also be presented by according to the indirect emission categories defined in EN ISO 14064-1:2018.

AR 18. If it is material for the undertaking's Scope 3 emissions, it shall disclose the GHG **emissions** from purchased cloud computing and data centre services as a subset of the overarching **Scope 3 category** "upstream purchased goods and services".

AR 19. When disclosing its gross greenhouse gas (GHG) emissions, the undertaking may refer to online calculators, databases and tools provided by recognised sources, such as the GHG Protocol.

GHG intensity based on net revenue

Calculation guidance

AR 20. When disclosing the information on GHG intensity based on net revenue required under paragraph 21, the undertaking shall:

(a) calculate the GHG intensity ratio by the following formula:

$$\frac{\text{Total GHG emissions (t CO}_2\text{eq)}}{\text{Net revenue (Monetary unit)}}$$

(b) express the total GHG emissions in metric tonnes of CO₂eq and the net revenue in monetary units (e.g., Euros) and present the results for the market-based and location-based method;

(c) include the total GHG emissions in the numerator and overall net revenue in the denominator;

- (d) calculate the total GHG emissions as required by paragraphs 12 (d) and 21; and
- (e) calculate the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP.

AR 21. Small and non-complex credit institutions (see Section 1 paragraph 2b)) may replace net revenue with a different financial indicator, until a sectoral standard is established.

Disclosure Requirement E1-3 – GHG removals and storage projects

GHG removals and storage in own operations

AR 22. In addition to their GHG emission inventories, undertakings shall provide transparency on how and to what extent they either enhance natural sinks or apply technical solutions to remove GHGs from the atmosphere in their own operations. While there are no generally accepted concepts and methodologies for accounting for GHG removals, this [draft] Standard aims to increase transparency on the undertaking's efforts to remove GHGs from the atmosphere (paragraph 15).

AR 23. The requirement in paragraph 17 shall only be reported by those undertakings that developed any GHG removal and storage project in its own operations, or contributed to in its upstream and downstream value chain. If no such projects are in place, undertakings are not expected to provide any information on GHG removals and storage.

Calculation guidance

AR 24. When preparing the information on ***GHG removals and storage*** from the undertaking's own operations and its upstream and downstream value chain required under paragraph 19, the undertaking may:

- (a) break down its GHG removals and storage by removal activity;
- (b) consider, as far as applicable, the GHG Protocol Corporate Standard (version 2004), Product Standard (version 2011), Agriculture Guidance (version 2014), Land use, land-use change, and forestry Guidance for GHG project accounting (version 2006);
- (c) if applicable, explain the role of removals for its climate change mitigation policy;
- (d) account for the GHG emissions associated with a removal activity, including transport and storage, under Disclosure Requirement E1-2 (Scopes 1, 2 or 3). To increase transparency on the efficiency of a removal activity, including transport and storage, the undertaking may disclose the GHG emissions associated with this activity (e.g., GHG emissions from electricity consumption of direct air capture technologies) alongside, but separately from, the amount of removed GHG emissions;
- (e) in case of a reversal, account for the respective GHG emissions as an offset for the removals in the reporting period;
- (f) use the most recent GWP values published by the IPCC based on a 100-year time horizon to calculate CO₂eq emissions of non-CO₂ gases and describe the assumptions made, methodologies and frameworks applied for calculation of the amount of GHG removals;
- (g) describe how the risk of non-permanence is managed, including determining and monitoring leakage and reversal events, as appropriate.

AR 25. The quantitative information on GHG removals may be presented by using the following tabular format.

Removals	Comparative	N	% N / N-1
<i>GHG removal activity 1 (e.g., forest restoration)</i>	-		

GHG removal activity 2 (e.g., direct air capture)	-		
...	-		
Total GHG removals from own operations (tCO₂eq)			
GHG removal activity 1 (e.g., forest restoration)	-		
GHG removal activity 2 (e.g., direct air capture)	-		
...	-		
Reversals (tCO₂eq)			

Application Requirements-Pollution (E2)

Disclosure Requirement E2-1 – Pollution of air, water and soil

Emissions of pollutants to air, water and soil

AR 26. Considering paragraph 38(a), if the undertaking is not required to disclose its pollutants emissions by law, but it already voluntarily reports information on such pollutants according to an Environmental Management System such as Eco-Management and Audit Scheme (EMAS), then it may choose to voluntarily disclose the pollutants it emits to air, water and soil, with the respective amounts.

AR 27. The amounts of **pollutants** shall be calculated and presented for the aggregated amount of each pollutant individually, but the mass of different pollutants shall not be added together. For example, an undertaking with two factories that emit mercury and lead, shall add the lead emission from the two factories, but not add lead and mercury emissions. The units of reporting shall be appropriate mass units, for example in tonnes or kilogrammes, depending on type and quantities of each pollutant.

AR 28. The **metrics** to be disclosed under paragraph 38(a) refer to information that the undertaking is already mandated to provide by law. This requirement was conceived to avoid any additional reporting burden on undertakings. In general, this requirement is expected to apply to undertakings that are operators of one industrial **installation** or intensive livestock farm covered by the [Industrial and Livestock Rearing Emissions Directive \(IED 2.0\)](#), amending the [Industrial Emissions Directive \(IED\)](#). The IED 2.0 applies to some 75,000 installations in Europe covering activities such as burning fuel in boilers with rated power of more than 50 MW, metal foundries, processing of non-ferrous metals, production of lime, manufacture of ceramic products by firing, production of plant protection products or biocides, rearing of any mix of pigs or poultry representing 380 livestock units or more, tanning of hides, or slaughterhouses. In these cases, the installation must already report to the competent authority the pollutants released to air, water and **soil**, and the data is publicly available at the [Industrial Emissions Portal Regulation \(IEPR\)](#), replacing the [European Pollutant Release and Transfer Register \(E-PRTR\)](#). Companies that operate more than one facility, do not have to report on their consolidated company-wide emissions under the EPRTR, as they report only at facility level. This disclosure requirement requires to report the total amount of all the facilities. Similarly, companies owning but not operating a facility, do not have to report to the EPRTR but are expected to reflect their facility-owned emissions in their sustainability statement.

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AR 29. Likewise, if under an EMAS certification an undertaking has been identified as having to monitor and report on the pollutants listed in the E-PRTR, these are in principle relevant aspects for the undertaking to include in its sustainability report.

AR 30. If an undertaking has only one facility or operates in only one facility, and if its pollution data is already publicly available, the undertaking may refer to the document where such information is provided instead of reporting it once again. Likewise, if the undertaking publishes an organisation-wide EMAS report that incorporates pollution data, it can include it in the sustainability report by reference.

AR 31. To report information on pollutants in the sustainability report, the undertaking should indicate the type of pollutant material being reported alongside the amount emitted to air, water and soil in a suitable mass unit (e.g., t or kg).

AR 32. Below can be found an example of how undertakings may present information on their emissions to air, water and soil divided by pollutant type.

AR 33. Pollutant	AR 34. Emissions (kg)	AR 35. Medium of release (air, water, soil)
AR 36. e.g., Cadmium and compounds	AR 37. 10	AR 38. Water
AR 39. Type of pollutant 2	AR 40.	AR 41.
AR 42. Type of pollutant 3	AR 43.	AR 44.

AR 45. The information required under this Disclosure Requirement shall be provided at the level of the reporting undertaking. However, the undertaking may disclose additional breakdown including information at **site** level or a breakdown of its **emissions** by type of source, by sector or by geographical area.

AR 46. Where the undertaking's activities are subject to Directive (EU) 2024/1785 of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (IED 2.0)⁽²⁰²⁴⁾ and relevant Best Available Techniques Reference Documents (**BREFs**), irrespective of whether the activity takes place within the European Union or not, the undertaking may disclose the following additional information:

- a. a list of installations operated by the undertaking that fall under the IED and EU BAT Conclusions;
- b. a list of any non-compliance incidents or enforcement actions necessary to ensure compliance in case of breaches of permit conditions;
- c. the actual performance, as specified in the EU-BAT conclusions for industrial installations, and comparison of the undertaking's environmental performance against "emission levels associated with the best available techniques" the (BAT-AEL) as described in EU-BAT conclusions;
- d. the actual performance of the undertaking against "environmental performance levels associated with the best available techniques (BAT-AEPLs) provided that they are applicable to the sector and installation; and
- e. a list of any compliance schedules or derogations granted by competent authorities according to Art. 15(4) Directive 2010/75/EU that are associated with the implementation of BAT-AELs.

AR 47. The amounts referred in paragraph 38 shall include the emissions from those facilities over which the undertaking has financial control and those over which it has **operational control**. It shall include only the emissions from facilities for which the applicable threshold value specified in Annex II of Regulation (EU) 2024/1244 is exceeded.

Microplastics

AR 48. The information to be provided on microplastics under paragraph 38(b) shall include, as a minimum, information on the microplastics amounts that the undertaking generates or uses.

These refer to intentional or unintentional generation or use both through production processes and procurement. For reporting purposes, microplastics leaving the facilities of the undertaking in the form of products, parts of products or services, or emissions are to be considered. Microplastics that stay within the facilities, that are used in production processes and that represent inventory used for business processes need not be reported, as they do not leave the facilities.

Substances of concern and substances of very high concern

- AR 49. 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).
- AR 50. 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.
- AR 51. The applicability of this Disclosure Requirement depends on the relevant regulations and legal frameworks that require the monitoring of substances for management purposes.
- AR 52. As per the ESRS Glossary, Substances of Concern constitute a broader group of substances, including: (a) the Substances of Very High Concern meeting the criteria laid down in Art. 57 and 59 of the Regulation (EC) No 1907/2006 ([REACH](#)); (b) the substances classified in one of the hazard classes or hazard categories, and as listed in Part 3 (Table 3.1) of Annex VI of Regulation (EC) No 1272/2008 ([CLP](#)); (c) and the substances that negatively affect the reuse and recycling of materials in the products in which they are present, as defined in the Regulation (EU) 2024/1781 ([ESPR](#)).
- AR 53. The list of substances covered by point (a) is available by consulting the 'Candidate List of substances of very high [concern for Authorisation](#)' managed by the European Chemicals Agency (ECHA), pursuant to Article 59 (10) of the REACH Regulation. The list of substances covered by point (b) is available by consulting the table of harmonised entries in Annex VI to CLP, containing all updates³ to the harmonised classification and labelling of hazardous substances, which are available in [Table 3 of Annex VI to the CLP Regulation](#), managed by the ECHA. The ECHA also provides a database ([C&L Inventory](#)) to filter Annex VI by specific hazard classes. As for point (c), the presence of substances of concern should be traceable throughout the specific products lifecycle and constitutes one specific Ecodesign requirement (Article 5) - the information requirement shall include, among others, (i) name or numerical code of the substances present in the product; (ii) location of the substances of concern within the product; (iii) concentration, maximum concentration or concentration range of the substances of concern, at the level of the product, its relevant components, or spare parts (Article 7.5).
- AR 54. Undertakings may refer to the regulatory sources – the REACH and CLP regulations – to identify information on the definitions and lists of substances as well as for further indications on hazard classes.
- AR 55. The information provided under this Disclosure Requirement may refer to information the undertaking is already required to report under other existing legislation (i.e., Directive 2010/75/EU or Regulation (EC) No 166/2006 "E-PRTR").

Application Requirements-Water and Marine Resources (E3)

Disclosure Requirement E3-1 – Water consumption

- AR 56. The requirements on water consumption under paragraph 20 (a) and (b) may not apply for undertakings that solely withdraw water from the public water network and discharge it into the sewer (e.g. office services), while they may be applicable to undertakings whose operations imply water evaporation (e.g. drying, power production) or water being embedded in products (e.g. food production).
- AR 57. The undertaking may disclose other information on water consumption performance in its own operations, in addition to the ones required by paragraph 20, such as total water recycled and **reused**⁽⁶⁶⁾ in m³ and total water stored and changes in storage in m³.

AR 58. The undertaking may also disclose its total water withdrawal, i.e., the amount of water drawn into the boundaries of the organisation (or facility).

AR 59. When disclosing information required by paragraph 21, the undertaking may provide additional intensity ratios based on other denominators.

Application Requirements-Biodiversity and ecosystems (E4)

Disclosure Requirement E4-1 – Impact metrics related to biodiversity and ecosystems change

AR 60. Methodologies available to collect data and measure the undertakings' **impacts** on **biodiversity** and **ecosystems** may be separated into three categories as follows:

- a. primary data: collected in situ using on the ground surveys;
- b. secondary data: including geospatial data layers that are overlaid with geographic location data of business activities;
- c. at the species level, data layers on the ranges of different species can be used to predict the species that may be present at different locations. This includes operation sites and sourcing locations. Different range layers will have differing levels of accuracy depending on certain factors (e.g., whether species ranges have been refined based on availability of habitat). Information on the threat status of the species, and the activities that threaten them, can provide an indication of the likely contribution that business activities may be having on driving population trends and threat status;
- d. at the ecosystem level, data layers reflecting change in the extent and condition of ecosystems can be applied, including levels of habitat fragmentation and connectivity;
- e. modelled biodiversity state data: Model-based approaches are commonly used for measuring ecosystem level indicators (e.g., extent, condition, or function). Models quantify how the magnitude of different pressures affects the state of biodiversity. These are referred to as pressure-state relationships and are based on globally collected data. Modelling results are applied locally to estimate how undertaking-level pressures will cause changes in ecosystem condition. An impact driver generally has three main characteristics: magnitude (e.g., amount of contaminant, noise intensity), spatial extent (e.g., area of land contaminated) and temporal extent (duration of persistence of contaminant).

AR 61. The undertaking may disclose, for example, land cover change, which is the physical representation of the drivers "habitat modification" and "industrial and domestic activities", i.e., the man-made or natural change of the physical properties of Earth's surface at a specific location.

AR 62. Land cover is a typical variable that can be assessed with earth observation data.

AR 63. When reporting on material **impacts** related to the **ecosystems**, the undertaking may, in addition to the extent and condition of ecosystems, also consider the functioning of ecosystems by using:

- (a) a metric that measures a process or function that the ecosystem completes, or that reflects the ability of the ecosystem to undertake that specific process or function: e.g., net primary productivity, which is a measure of plant productivity based on the rate at which energy is stored by plants and made available to other species in the ecosystem. It is a core process that occurs for ecosystems to function. It is related to many factors, such as species diversity, but does not measure these factors directly; or
- (b) a metric that measures changes to the population of scientifically identified species under threat.

AR 64. At the **ecosystem** level, data layers reflecting change in the extent and condition of **ecosystems** may be applied, including levels of **habitat fragmentation** and connectivity.

Application Requirements- Resource use and Circular Economy (E5)

Disclosure Requirement E5-1 – Resource inflows

AR 65. The disclosure required by paragraph 27 (a), a description of its impacts and risks originating from **resource inflows** used in the undertaking's own operations and along its upstream value chain, it may distinguish between: a) materials, including: i) raw materials, distinguishing between critical raw materials and rare earths; ii) **associated process materials**; iii) semi-manufactured goods or parts; b) products, including several categories such as **packaging**, IT equipment, textiles, furniture, buildings, heavy machinery, mid-weight machinery, light machinery, heavy transport, mid-weight transport, light transport and warehousing equipment; c) water; c) property, plant and equipment. When describing the relevant resource inflows that generate IROs, the undertaking shall explain what type it is referring to. Examples include raw materials (e.g. wood, ores), products (e.g. machinery), goods, semi-manufactured goods, or parts used as input into its products and services (e.g. electronic components).

AR 66. When assessing the materiality of resource inflows, the undertaking may consider both the volume or weight of specific materials and their impact on operations. The undertaking may use the following materiality ratio formula to determine if a resource inflow is material:

$$\text{ratio of specific resource inflows} = \left(\frac{\text{Volume of specific resource inflow (t)}}{\text{Total resource inflows (t)}} \right) \times 100$$

AR 67. While specific thresholds for materiality may vary depending on the context and industry, inflows with higher ratios typically warrant disclosure due to their potential impact on the undertaking's sustainability and operational performance.

AR 68. The **resource inflows** to be considered for calculation of **metrics** mentioned in paragraphs 27 are the ones considered to expose the undertaking to material impacts or risks and not all resource inflows the undertaking is sourcing.

AR 69. The reported usage data are to reflect the material in its original state, and not to be presented with further data manipulation, such as reporting it as "dry weight".

AR 70. The annual mass-flow (see paragraph 27 (b)) is an indicator aligned with the EMAS requirements on efficiency of material consumption and it illustrates an undertaking's dependency on specific materials in its operations (e.g., wood and steel for the construction industry). The undertaking is here required to provide information on the materials it uses, including both the materials acquired from suppliers and those sourced internally from production. To compute the annual mass flow of the relevant materials it has used, the undertaking will need to first identify the specific relevant materials on which its operations are dependent and for which material efficiency needs to be evaluated (e.g., material efficiency of wood). If different types of materials are used, the undertaking will need to provide separately the annual mass flow (i.e., total weight for each relevant material used; e.g., tonnes of wood purchased) for each relevant material in an appropriate manner, for example by breaking it down by the use to which they are put (EMAS, 2023). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products, or others (excluding energy sources and water).and provide the total weight for each key material used (e.g., tonnes of wood purchased). The mass flow of relevant materials used will result from the sum of the weight of all used materials, including raw materials, auxiliary materials, input materials, semi-finished products, or others (excluding energy sources and water).

AR 71. The annual mass-flow is to be preferably expressed in units of weight (e.g., kilograms or tonnes), volume (e.g., m³) or other metric units commonly used in the sector.

Disclosure Requirement E5-2 - Resource outflows

- AR 72. When addressing the requirements on products and materials disclosure, if and undertaking applies circular economy principles, it may provide additional information on the extent to which they are durable, recyclable and repairable.
- AR 73. When reporting on the total amount of waste generated, the undertaking may also disclose the percentage of non-recycled waste (by weight and on a wet basis).⁽⁶⁶⁾
- AR 74. The undertaking may disclose its engagement in product end-of-life **waste management**, for example through extended producer responsibility schemes or take-back schemes.
- AR 75. When presenting information on its **waste** generation or diversion from disposal, the undertaking should preferably report such information in units of weight (e.g., kg or tonnes). Nevertheless, should it the units of weight be considered an inappropriate unit by the undertaking, they may alternatively disclose the afore-mentioned metrics in volumes (e.g., m3) instead.
- AR 76. When considering the **waste** streams relevant to its sectors or activities, the undertaking may consider the list of waste descriptions from the European Waste Catalogue. Waste marked with an asterisk (*) in the EWC is classified as hazardous, particularly if it contains substances with hazardous properties such as flammability, toxicity, or corrosiveness. Applicability depends on the presence of hazardous or radioactive materials in business processes.
- AR 77. Examples of other types of disposal operations under paragraph 65 (iii) can be found in Annex I of Directive 2008/98/EC (Waste Framework Directive).
- AR 78. When disclosing information on the total annual waste diverted to recycling or reuse, the undertaking should consider the waste that is sorted and sent to recycling or reuse operators (e.g., amount of waste put into recycling container, or sorting of waste into certain categories of materials and their delivery to waste treatment facilities), rather than the waste that gets effectively recycled or reused.

Application Requirements - Anticipated financial effects from material environmental-related matters impacts and risks(E6)

- AR 79. For each of the environmental topics for which there are material risks, the undertaking may disclose:
- a. a quantification of the anticipated financial effects in monetary terms, or where not possible with reasonable effort, qualitative information. The quantification of the anticipated financial effects in monetary terms may be a single amount or a range;
 - b. a description of the effects considered, the related impacts and dependencies to which they relate and the time horizons in which they are likely to materialise; and
36. the critical assumptions used to quantify the anticipated financial effects, as well as the sources and level of uncertainty attached to those assumptions.
- AR 80. In relation to the potential to benefit from material environmental-related opportunities, the undertaking may disclose its expected cost savings from environmental-related risk mitigation actions.
- AR 81. The undertaking may also provide information on how it expects its financial position, financial performance and cash flows to change over the short, medium- and long-term, given its strategy to manage risks, taking into consideration:
- AR 82. its investment and disposal plans (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans that the undertaking is not contractually committed to; and its planned sources of funding to implement its strategy.
- AR 83. In alternative to disclosures in paragraph AR 67 (a) on the monetary quantification of anticipated financial effects, the undertaking may classify each anticipated financial effect according to the following ranges; (a) low; (b) medium; (c) high. Examples of environmental-related (other than climate) physical and transition risks can be found in ESRS E2 AR 7. (for

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pollution), ESRS E3 AR 7. (for water), ESRS E4 AR 9. (for ecosystems and biodiversity) and ESRS E5 AR 5. (for circular economy).

AR 84. Considering anticipated financial effects due to material opportunities related to circular economy, the undertaking may, for instance, illustrate and describe how it intends to strengthen value retention.

AR 85. The undertaking may consider as part of its anticipated financial effects related to pollution operating and capital expenditures related to incidents and deposits (e.g., interruptions of production resulting in pollution), which may include:

- (a) costs of eliminating and remediating the respective pollution of air, water and soil including environmental protection;
- (b) damage compensation costs including payment of fines and penalties imposed by regulators or government authorities.

AR 86. Incidents may include interruptions of production, whether arising from the supply chain and/or from own operations, which resulted in pollution.