



Companies' reaction on the Omnibus Proposal

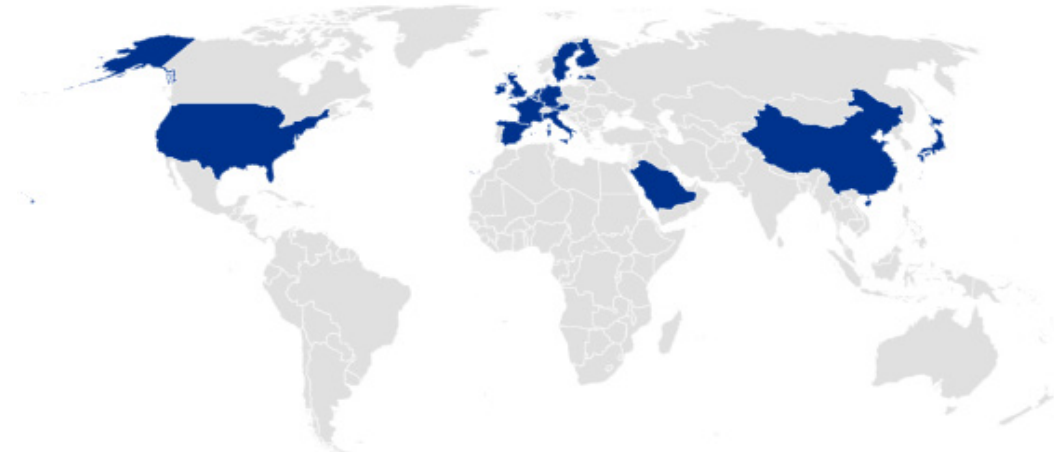
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Global insights into current
CSRD projects

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2nd April 2025

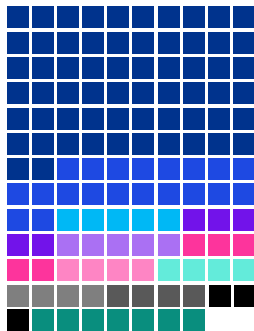


Who participated in the survey?

128 companies were considered in our survey
 – from 18 countries and 13 sectors.

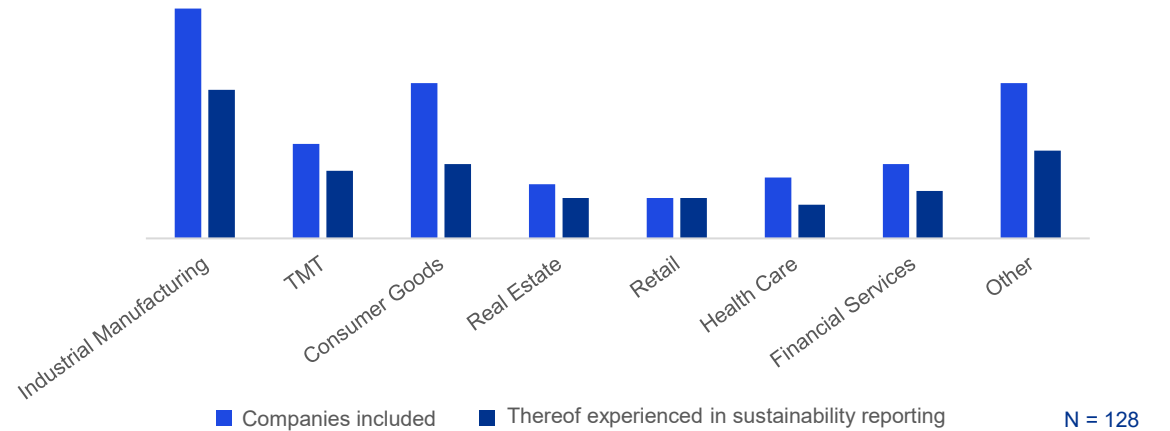


Headquarters of companies included:



HQ Locations		
Germany	Netherlands	UK
USA	Japan	Saudi Arabia
Spain	France	China
Belgium	Finland	Latvia
Italy	Ireland	Austria
Luxembourg	Netherlands	Sweden

Most companies in **different sectors** are experienced in sustainability reporting:



The majority of companies would be **obliged to report** after Omnibus Proposal



Source: KPMG International; 2025

Results are based on a voluntary survey among ESG-assurance and advisory client service teams of KPMG member firms. The survey depicts the status of the companies' approach to CSRD projects at the time of the survey (until 28 March 2025).

How to proceed with sustainability reporting?

Despite the uncertainties of Omnibus,

88% don't stop with their ESRS implementation projects, thereof **22% are currently on pause** and **8% are undecided**. Only **12% have stopped**.

Reasons to continue

- Using the proposed additional time to **continue with due care** and **focusing on no-regret moves**, e.g. carbon accounting, climate risk and resilience analysis, transition plan, internal governance systems
- **Strategic relevance** of ESG report for companies to satisfy investors' information needs and ensure access to capital
- **Risk of non-compliance** if stop-the-clock is not transposed in time and in all relevant jurisdictions for the reporting group
- Companies will still be **in scope**

Reasons to pause or stop

- **Re-evaluate reporting strategy** under proposed new scoping criteria and
- Pausing to align internally on proposed adjusted timeframe to then **proceed with no-regret moves and / or VSME**
- **Overcome regulatory uncertainty** during legislative processes and await further reporting guidance
- Companies **fall out of scope** and do not have further reporting obligations in the EU

Impact on reporting strategies

The CSRD has made sustainability reporting mandatory for many companies for the first time. **But how does the Omnibus proposal impact reporting strategies?**

3 of 4 Plan to use ESRS as a reporting framework even before required by CSRD / Omnibus.

N = 84
Companies that plan to continue reporting

2 of 3 will continue to report on ESG even voluntarily.

N = 23
Companies outside the Omnibus proposal scope

Standards of choice when pursuing voluntary reporting



Source: KPMG International; 2025

Results are based on a voluntary survey among ESG-assurance and advisory client service teams of KPMG member firms. The survey depicts the status of the companies' approach to CSRD projects at the time of the survey (until 28 March 2025).

Status quo of sustainability reporting



From the **128 companies** that were included in the survey **80 already reported*** on sustainability matters – obligatory and voluntary using different frameworks.

7 out of 10 companies included are expected to be **required to report** according to the **Omnibus proposal**.



Every third company included are **PIEs**, i.e., publicly listed, credit institutions, insurance providers or other. **89% of them** reported* on sustainability matters.

From the **128 reporting companies**, more than **63%** did so on a **voluntary** basis in the past*.



Non-exhaustive examples

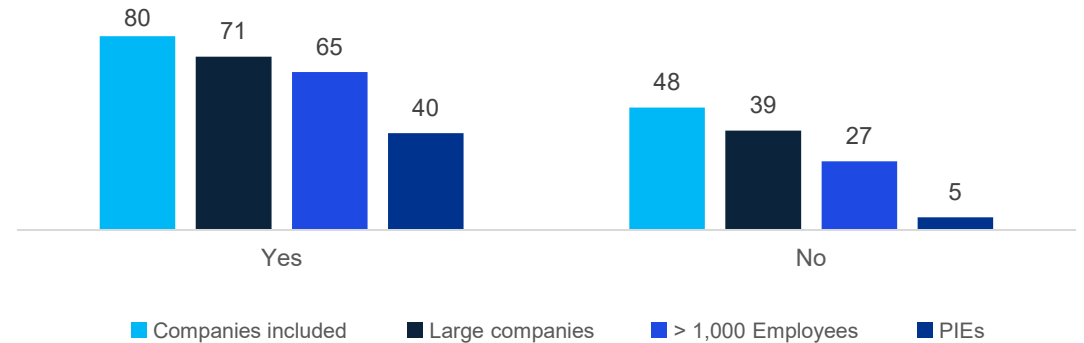
*FY 2024 and earlier

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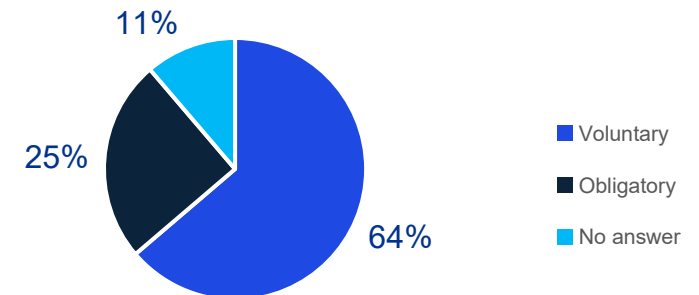


N = 80
Source: KPMG International; 2025

Have the companies reported for 2024?



Was reporting in the past* voluntary or obligatory?



N = 80

Source: KPMG International; 2025



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