

European Commission

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Our ref: RJ-CSR 27 D
Direct dial: +31(0)88 4960 391
Date: Hoofddorp, June 3rd, 2026
Re: EC consultation Voluntary Standard

Dear Sir, dear Madam,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond to the sustainability reporting Standard for voluntary use (Voluntary Standard) released for public consultation by the European Commission on 6 May 2026. The DASB appreciates the intention to support undertakings, not subject to mandatory sustainability reporting requirements, in voluntary reporting on a standardized basis. Another objective of the Voluntary Standard is to function as value chain cap, identifying the maximum of information requests from undertakings subject to the Corporate Sustainability Reporting Directive (CSRD). The DASB questions whether both objectives of the Voluntary Standard fully align with each other. The DASB stipulates the risk that the voluntary reporting character might be repressed by the value chain cap.

We will address observations and recommendations from the perspective of a voluntary reporting standard in paragraph 1. Paragraph 2 contains our suggestions from the perspective of a tool for the value chain cap. All our suggestions are aimed at improving clarity, consistency, and practical usability of the Voluntary Standard. The appendix contains further detailed observations.

1. Structure of the Voluntary Standard

1.1 Categorisation within the Voluntary Standard is too complex

The DASB acknowledges that the Voluntary Standards provides a helpful tool for undertakings outside the scope of the CSRD, owing to its compact design. However, the internal structure of the standard is confusing. In particular, the four categories “necessary”, “necessary if applicable”, “voluntary” and “consideration when reporting sector information” renders the standard more complex than intended. The complexity is reinforced by the choice between applying the basic module only, or also the comprehensive module (see paragraph 1.2.).

Generally, the DASB is of the opinion that the explicit categorisation appears unnecessary since the formulation of the disclosure requirement often sufficiently reflects the category. For example, the disclosure requirements in the category “necessary if applicable” start with the

phrase “if the undertaking ...”, which makes it clear that if the undertaking does not disclose information on the disclosure requirement, the requirement is not applicable. Similarly, for voluntary disclosures “if the undertaking wants...”, this makes it sufficiently clear that the disclosure is not required. Also within the voluntary category, the text of the disclosure requirement can already indicate its relevance or status. Disclosure requirements mentioning “the undertaking may disclose” and “if the undertaking wants to provide more comprehensive information on (...), it may disclose” Also, the category “considerations when reporting sector information” is ambiguous, as it is unclear whether these items are mandatory or merely optional.

The DASB suggests (i) removing categories, while maintaining to provide information on the relevance of each disclosure in the text of the provision and (ii) further clarifying which disclosure requirements are mandatory. The latter is especially relevant, since the information in the Voluntary Standard also defines the information subject to the CSRD value chain cap.

1.2 Modules of the Voluntary Standard

Furthermore, the categorization together with the division of the Voluntary Standard into the Basic Module and the Comprehensive Module might not enhance the clarity of the Voluntary Standard as a whole. Currently it seems like an undertaking - regardless of its size - can claim compliance with the Voluntary Standard when reporting solely on the Basic Module. The DASB suggests clarifying when claiming compliance with the Voluntary Standard is appropriate.

. While the DASB recognizes that the Voluntary Standard is intended to be a flexible instrument for voluntary application, it should nevertheless provide an unambiguous basis for reporting.

2. Value Chain Cap

A key concern of the DASB relates to the operationalization of the value chain cap. In the Voluntary Standard the value chain cap is only mentioned in Annex II, but a reference to this Annex or an explanation in the Voluntary Standard is missing. Also, the Voluntary Standard contains the phrase “This Standard does not impose legal reporting obligations, unlike the ESRS” which stipulates the voluntary character of reporting but doesn’t acknowledge the legal implications of the value chain cap. We believe that clearer articulation of the value chain cap within the main body of the standard, accompanied by explicit linkage to the corresponding disclosure requirement in the revised ESRS, would enhance clarity.

2.1 Value chain cap for all entities not in scope of the CSRD-scope criteria

It is likewise notable that the value chain cap applies only to undertakings with less than 1,000 employees, while the CSRD turnover threshold of EUR 450 million is not reflected. Consequently, entities with more than 1,000 employees but less than EUR 450 million in turnover are not in scope of the CSRD, and at the same time do not benefit from the protection of the value chain cap. A rationale for this deviation seems to be lacking and this deviation conflicts with the general principle of internal consistency, and hence complicates the reporting requirements. The DASB suggests to further clarify the scope of the value chain cap by explaining, if and why entities with more than 1,000 employees and less than EUR 450 million are not in scope of the value chain cap and the consequences thereof.

2.2 Size-based differentiation expected

Also, while there are specific requirements for micro-entities (< 10 employees), there is a significant gap for all other categories. We would propose differentiated requirements for entities with, for example similar to the categorization of entities for financial reporting (micro, small, medium and large), fewer than 10 employees, fewer than 50 employees, fewer than 250 employees, and fewer than 1,000 employees. In practice, CSRD-reporting entities would generally not be expected to request information from micro-entities at all, as such information would typically not be material. The DASB suggests protecting micro-entities even more by prohibiting information requests to micro-entities and consider differentiating to protect small companies up to 50 employees better as part of the value chain cap. This could include encouraging the use of sectoral data, industry averages or recognized sector standards where appropriate, before requesting entity-specific information from very small undertakings up to 50 employees.

2.3 Unclear requirement for data assessment

Within the Voluntary Standard, entities may voluntarily choose to report either on a consolidated or a standalone basis. However, it remains unclear whether the value chain cap should be assessed on consolidated data or on standalone information. The Voluntary Standard framework is primarily focused on reporting at the entity level as a whole, whereas a value chain partner is typically interested in information specifically related to the transactions between the value chain parties. It is therefore uncertain whether the value chain cap restricts information requests strictly to the entity level. We suggest to further clarify this aspect of the value chain cap.

We also observe several inconsistencies between ESRS and the Voluntary Standard which may undermine comparability and the functioning of the value chain cap. For example, ESRS S uses the concept of an “adequate (minimum) wage,” while the Voluntary Standard refers to “minimum wage.” Closer alignment with ESRS definitions would reduce unnecessary value chain requests and support the practical functioning of the cap.

2.4 Include the category “necessary if applicable” in the value chain cap

It is also notable that all “necessary, if applicable” requirements are excluded from the value chain cap, and the rationale is missing. We suggest including the “necessary if applicable” category in the value chain cap.

2.5 Practical effectiveness of the value chain cap

The DASB notes that the value chain cap primarily operates within the context of CSRD reporting. In practice, undertakings may continue to receive requests for sustainability information through financing arrangements, procurement processes, ESG data platforms, contractual requirements, due diligence processes (CSDDD) or other commercial channels. While the European Commission has indicated that it will monitor the practical effects of the value chain cap, the DASB is concerned that uncertainty regarding its interaction with other

information requests may limit its effectiveness and create avoidable reporting burdens for undertakings outside the scope of the CSRD.

The DASB therefore encourages further clarification on the practical interaction between the value chain cap and these information requests, not only to ensure that the intended relief for undertakings outside the CSRD scope can be achieved in practice but also to clarify if the information originating from other than value chain requests is allowed and/or required to be included in the CSRD sustainability statements.

3. EFRAG Knowledge Hub

We acknowledge the value of the EFRAG Knowledge Hub, which is widely regarded as a helpful resource. Paragraph 5 of the Voluntary Standard stipulates that practical application of the Voluntary Standard can be accessed in the EFRAG Knowledge Hub and can provide guidance and support.

The DASB notes that ensuring long-term maintenance and clear governance of the Knowledge Hub will be essential to its continued usefulness, especially when the voluntary standard is used solely as a value chain cap. Furthermore, we believe that the EFRAG Knowledge Hub could be improved, particularly with respect to locating local language versions of the templates.

4. Conclusion

While we support the objectives of the Voluntary Standard, we believe that further clarification and alignment are needed to ensure that the standard is both proportionate and operational in practice. Strengthening the articulation of the value chain cap, clarifying applicability concepts, and improving definitional consistency with ESRS would significantly enhance the usability and acceptance of the Voluntary Standard.

Please feel free to contact us if you wish to discuss the contents of this cover letter or our appendix. On behalf of the DASB as well as Olga Smirnova and Simon Braaksma as co-chairs of the DASB Working Group Sustainability Reporting,

Yours sincerely,

Gerard van Santen
Chairman Dutch Accounting Standards Board

Appendix

Voluntary Standard	
Voluntary Standard B10	Inconsistency between ESRS – S refers to adequate (minimum) wage. Voluntary Standard to minimum wage. Suggestion to either align or add rationale.
Voluntary Standard C6	ESRS – S own workforce includes employees and non – employees Voluntary Standard C6 covers employees only. Suggestion to either align or add rationale.
Voluntary Standard C8	Inconsistency in categorization of ESRS 1 SBM-1 (par 20, 6 iii) vs. Voluntary Standard C8 revenues from certain activities as part of “governance metrics”