



# Step-by-step plan: what mandatory CSRD means for your business

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 Nederlandse versie

Large businesses and listed SMEs will have to report on their sustainability policies, goals and results starting in 2025 and 2026. This will look at the impact of the business and its supply chain partners on people, the environment, and society. Learn how to create a sustainability report.



## Proposal CSRD simplification

The European Commission has proposed [measures to make the rules simpler](#). The proposal means that most obligations in the CSRD will only apply to large businesses. So, fewer businesses will be affected by the guidelines. The proposal still needs to be adopted by the European Parliament and the European Council. You can find out more about the European Commission's proposal in this [webinar by the Social and Economic Council \(SER\)](#).

Read more about [the Omnibus proposal and the proposed changes](#) (in Dutch).

## 1 Know what rules (standards) you need to comply with

Mandatory



Under the European Corporate Sustainability Reporting Directive (CSRD), companies are required to file a [mandatory sustainability report](#). This EU directive is part of the [European Green Deal](#). The report covers 3 main themes: environment, social impact, and governance. You must adhere to the [European Sustainability Reporting Standards](#) (ESRS) in the report. These standards define what you must report on. The ESRS are developed by [EFRAG \(European Financial Reporting Advisory Group\)](#).

The CSR support centre ([MVO Steunpunt](#), in Dutch) provides information about responsible business conduct (RBC), including the most important international sustainability laws and regulations. You will also find the [ESRS navigator](#), a practical guide to sustainable reporting.

You can see more about how CSRD affects businesses in this [webinar](#) (English subtitles available) plus the [accompanying pdf presentation](#) from the Social and Economic Council (SER). And you can find information on Responsible Business Conduct (RBC) on the [RVO website](#). For a further explanation of the CSRD in English, read the [SER publication on CSRD and ESRS](#).

### More about the ESRS

#### - 2 types of ESRS standards

There are 2 types of ESRS standards:

- [12 general ESRS standards](#) that apply to all businesses. Such as pollution, circular economy, own staff, or business behaviour.
- [Specific ESRS standards](#) that vary by sector. Standards will be added for a number of sectors in the coming years.

#### - Data points

Each ESRS standard consists of different reporting requirements. These in turn consist of data points. These are measurement points that you report on, such as water consumption. In total, there are about 1,100 data points that you can report on. You only have to report on the data points related to your business.

### **- Unlisted SME businesses**

Do you have an unlisted SME company? If so, you may choose to report voluntarily. You may also face demands from customers or suppliers to comply with CSRD. By starting to collect and publish information early, you can prepare in time.

Read [when mandatory reporting](#) will be introduced step by step.



### **SME standards**

For SMEs, there are 2 separate standards. The [LSME standard for listed SMEs](#) and the [VSME standard for unlisted SMEs](#) who participate voluntarily. These standards are less complex than the ESRS. The European Commission has yet to finalise the standards.

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## **List what information you already have**

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You need to report on many topics. Think about:

- [CO<sub>2</sub> emissions](#)
- employees
- the [purchasing process](#)
- finances
- housing
- [mobility](#)
- strategy

List what data you already have on [sustainable business operations](#). In doing so, make use of existing processes, such as financial administration and internal control. These can help you set up the same processes for sustainability data. Also see what [certifications and \(green\) labels](#) you already have.



## Broader than climate change

Sustainability is broader than climate change. It is also about [responsible business conduct \(RBC\)](#), such as equal treatment of your own staff, soil pollution, and corruption. These are sustainability topics covered in the ESRS.

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### 3 Build a team and make sure the CSRD has a place in your organisation

Mandatory



Collaboration is important. Make sure your management knows about the CSRD and considers it important. Involve departments and individuals who already collect information on [ESRS standards](#) that you need to report on. Such as strategy, finance, HR, and legal affairs. Assemble a team with representatives from each topic. Record who is responsible for what. Involve your employees and give them time and space for data collection. They already have knowledge of the processes and often know what it is all about.

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### 4 Involve your accountant early on in the process

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Involve your accountant in the process at the beginning. Ask about expectations. Have your accountant look into the dual materiality assessment (DMA) process (see step 7) as well. Agree when the audit for the DMA will take place. And what data you want to collect. Your auditor can check whether that data is consistent with ESRS standards. Record all the steps you take on paper. As well as the choices you make in the process.

By doing this in time, problems with (the reliability of) data can be spotted early. This prevents your report from being rejected at a later stage. Your sustainability report must ultimately be approved by an external auditor , a so-called Independent Assurance Service Provider (see page 25 of the document).

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## 5 Make a list of all themes that play a role in your business

Mandatory



Do some preliminary research and make a list of all themes that play a role in your business (longlist). And on which ESRS standards (see step 1) you should provide information. Also check which sustainability themes are important in your sector. Sector organisations can help with preparations.

You can make use of different information:

- Understand where and how your business procures and markets goods or services. Research the risks of the country, region, and sector you work in with the [CSR Risk Check](#) . RVO can help you find information about the country you (want to) do business with as well. Check their [RBC pages](#) .
- Look at audits, certifications, annual reports and other ways the businesses you work with (or their supply chain) deal with human and environmental risks. The government sets several [standards for sustainable purchasing](#) .
- Check OECD guidelines and existing (industry) agreements on the [International Responsible Business Conduct Agreements website](#) .

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## 6 Engage with your stakeholders (stakeholder analysis)

Mandatory



Talking to those involved in your company (stakeholders) is an important part of the sustainability report. Enter into dialogue with your (most important) stakeholders and record all discussions. As well as the choices you make in the process. You should be able to explain the process afterwards (to your accountant). This is called a stakeholder analysis. Focus on the stakeholders

who have the most impact on your business. Or on which your business has the most impact.

## - Who are your stakeholders?

Stakeholders of your business can be:

- employees
- customers
- suppliers
- a purchasing group
- board of supervisors
- auditor
- banks
- environmental organisations
- the government

Make sure you at least engage with individuals or groups whose interests are or may be affected by your organisation's activities. Such as local residents, employees, or communities.

## - What do you discuss with your stakeholders?

Discuss with your stakeholders what they consider important and what they expect from your organisation. And where they see opportunities and risks for your organisation. Also discuss which topics are important to you for the organisation. And how you arrived at those topics.

The topics you discuss with stakeholders are taken from the 12 general ESRS standards (see step 1) that apply to all companies. Examples are:

- Own employees.
- Material use and [circular economy](#), such as company waste.
- Business behaviour, such as promoting your corporate culture.

You do not have to cover all topics (or data points). You can also add points that are important to you. Such as data reliability.

## - How do you engage with stakeholders?

You can use questionnaires or conduct interviews. For a complete picture, it is good to speak to many stakeholders. For your business, determine what is enough and achievable. Then describe in your report how your business takes stakeholders' interests into account. For example, in your strategy and ways of working.

Find (Dutch only) information and examples for setting up your own stakeholder dialogues here:

- View [9 steps to a meaningful dialogue](#) (PDF, in Dutch).
- Other [tools, knowledge documents, and training](#) (in Dutch) from the Social and Economic Council (SER) that help with setting up.



## Work together with your sector

Engage with your sector so that you can prepare together. Many impacts, risks, and opportunities are common across the sector. Also consider joint discussions with stakeholders. Or sharing data to work smarter and save costs. Sector organisations can play an important role in preparations. Contact your sector organisation to find out what they can do for you.

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## Identify key topics with a double materiality assessment (DMA)

Mandatory



Make a list of sustainability topics that are most important to your organisation and stakeholders (shortlist). You do this with a double materiality assessment (DMA). The analysis shows which data points (see step 1) you need to report on. You usually do not need to report on all data points. Record the process of the DMA. As well as the choices you make in the

process. Your accountant should be able to check your assessment afterwards.

## What is a double materiality assessment (DMA)?

A double materiality assessment (DMA) is a key requirement of the CSRD. It shows the impact society has on your business (such as CO<sub>2</sub> emissions or corruption). And it shows the impact your business has on society, the environment, and people. Such as damage to biodiversity or human rights violations. The issues that come out of the analysis are those that are most important to your organisation and stakeholders.

Read more about the [ESRS guidelines for a materiality assessment](#). Or watch [this Social and Economic Council \(SER\) webinar](#) (in Dutch) on the impact of double materiality on businesses.

## This is how to make a double materiality assessment (DMA)

There are several steps to achieve a materiality assessment. And there are several guides you can use to get started with and perform your DMA:

- EFRAG has published an [Implementation Guidance document](#) that outlines why and how to set up your DMA.
- This [7-step guide](#) from the Royal Netherlands Institute of Chartered Accountants (NBA, in Dutch) helps you make a materiality assessment.
- The Financial Markets Authority (AFM) has drawn up [10 navigation points](#) that can support you in implementing the double materiality assessment.
- In this Social and Economic Council (SER) [webinar](#) (in Dutch), you will see how to get started with double materiality for businesses.



## Continuous process

The mandatory double materiality assessment is an ongoing process. Your company's opportunities and risks may change. The data you use

may also improve. Make time for a more comprehensive analysis in later years as well.

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## Start collecting data

Mandatory



Once you have completed the double materiality assessment, you will know which topics to report on. Research what information you need. For example, conduct a GAP analysis and see what you do and do not have in terms of data. The analysis makes a comparison between an existing and a desired situation. The data will give you a picture of what you are already doing well and where improvement is needed. You can then make plans and set goals.

Start by collecting data that you can measure. For example, connect to existing processes and information systems, such as payroll or a procurement model.

### - 2 types of data

There are two types of data:

- Qualitative data. This is descriptive data that helps to understand the business. Such as a description of how stakeholders' interests have been taken into account.
- Quantitative data. This is data that consists of numbers. Such as the total number of employees covered by a collective labour agreement (CAO).

Look at what you already test and who is responsible for the data. Discuss how your employees provide the data.

### + Get in touch with your chain as soon as possible

Inform your chain partners \* about the reporting obligation as soon as possible so that you can prepare together. This is often where the biggest risks and opportunities for your business lie. It is called chain responsibility . Think about strategy and how you want to have influence together. For example, on fair pay. Also discuss how to share the right data with each other.

Select which buyers or suppliers you want to collect data from. Only request data from the businesses that have the most impact. And data that fit the topic you are reporting on. In this way, you will avoid additional administrative burdens. If you start by doing it yourself first, it can take a lot of time. For more tips and resources on chain responsibility, [visit RVO.nl](#) .

\* see page 15 for an explanation of the impact of the CSRD on your chain partners

### You cannot measure all data yourself

Some complex data you cannot measure on your own. To measure these, you can cooperate with the government and other parties. Also make use of public instruments with which you can measure data. Also ask your sector organisation for available data. The Authority Consumer & Market (ACM) has made a '[Sustainability Claims Guide](#)' (in Dutch) with practical examples to help formulate sustainability claims.

Public tools you can use are:

- [International RBC agreements](#)
- [CO<sub>2</sub> emissiefactoren](#) (in Dutch)
- [CO<sub>2</sub> footprint calculator](#)
- [Open Supply Hub](#)

### How do you ensure your data is reliable?

Use the same methods as for financial processes and internal control that are already in place in the organisation. Check where the data you are reporting on will come from. And how reliable that information will be. You can record this in a handbook. In it, you put, for example:

- how the data will be reported (methodology)
- where the information comes from
- who is responsible for registration and control
- which systems and processes are linked to it

- Which internal measures are in place for reliability

This is how you show your auditor how you give data reliability a place within your processes and systems. For data from your suppliers, you can do your own analysis. In it, you test for all suppliers and the data whether there are any strange discrepancies. Avoid using misleading [sustainability claims](#).

Also watch this SER [webinar](#) on CSRD and ESRS and reliable data (in Dutch).

### How do you know if the data from your chain is correct?

Some complex problems you cannot solve on your own. You can use, for example, the SER's [International RBC agreements](#). In these, businesses work together with the government and other parties. And are supported with data collection. This allows you to take a more structured and solution-oriented approach to data collection. You can also use qualitative information. For example, you then write down what you do in a particular collaboration with suppliers. [See what agreements are in place](#).

### What can you do if your data is not available?

You may still use estimates for the first 3 years. Are you not yet (fully) sustainable? Or have you taken no action yet? Then you can write down in your report what the current situation is and where you want to grow towards. It is important that you can explain what you do not yet know. You have 3 years to report the right information.



### Transition period

The first 3 years you have to report is a transition period. You do not have to report everything yet. For example, in the first year, you do not have to report on financial impacts related to environmental impacts, risks, and opportunities. Or on topics deeper in the chain of businesses you work with. Such as biodiversity and various social issues. Do you have a business with fewer than 750 employees? Then there are further exemptions.

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## Have your sustainability report audited by an accountant

Mandatory



You must have the sustainability report audited by an [external auditor](#) (in Dutch). This can be the same accountant who audits your financial statements. For instance, your accountant will check whether you have chosen the right stakeholders for the materiality analysis. So, it is wise to ask your accountant early on in the process to take a look (see step 4).

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## Publish your sustainability report

Mandatory



The sustainability report is part of the annual management report. You must [submit it to the Netherlands Chamber of Commerce KVK](#). You should also put it on your company's website.



### Reporting is not an end in itself

A [sustainable business model](#) also provides opportunities. Through (mandatory) discussions with stakeholders, you build a better relationship. You also gain more insight into your production process, operations, and value chains. The sustainability report creates more cooperation between different departments within your business.