

EFRAG Sustainability Reporting

Draft work program 2026

[NOTE THIS DOCUMENT ASSUMES 90 DAYS CONSULTATION FOR N-ESRS]

1. Objective of the Consultation

1. The CSRD requires the European Commission (EC) to consult the Member States and the European Parliament on EFRAG’s work program. [This document has been approved by the EFRAG SRB on 26 March 2026]. It describes the expected activities of EFRAG Sustainability Pillar for 2026.
2. The content of this document is based on the current available resources and on average assumptions on the expected lengths and number of SR TEG and SRB discussions that are needed to approve a given deliverable. The effective delivery date may deviate from the estimate, such as when additional outreach is necessary with some stakeholders or when the consensus building for EFRAG decision making requires more time for a specific matter.
3. This document sets out the proposed EFRAG Sustainability Reporting work programme for 2026
4. 2026 EFRAG activities focus on: ESRS for non-EU Groups (Art. 40 (a) of the CSRD) (‘N-ESRS’), continuation of activities to support SMEs, continuation of the Knowledge hub activities, interoperability and updating the XBRL taxonomy following the ESRS simplification. EFRAG will as well respond to its stakeholders’ most pressing requests for support, such as in the area of Anticipated Financial Effects, and consult European stakeholders on their needs for further implementation support regarding the Voluntary Standard¹ (‘VS’) and the simplified ESRS, before starting additional activity in this area.
5. EFRAG Standard Setting activities are governed by the content of EFRAG Due Process Procedures², which establish the necessary steps to be put in place for each deliverable.

2. Background and Context

6. EFRAG has been mandated to provide technical advice to the European Commission on sustainability reporting standards and related implementation support. This work program reflects:

¹ Voluntary Standard to be issued by the European Commission as Delegated Act in 2026, based on the Voluntary Standard for SMEs issued by EFRAG on December 2024.

² [EFRAG’s Due Process Procedures](#)

- a. The mandate attributed to EFRAG in the CSRD as amended by the Omnibus I Directive;; and
 - b. The agreement signed in December 2025 with the EC for the prolongation of the pilot project, covering a period of 18 months until mid-2027.
7. The program has been developed considering regulatory timelines and resource allocation. It also takes account of the need to wait until the Commission has adopted the Delegated Acts for the VS and for Simplified ESRS (expected in June 2026) before launching any new public consultations.
 8. EFRAG expects to be able to discuss in public various deliverables as described in this document starting from June 2026, i.e. based on the Delegated Act as adopted by the Commission but before the end of the scrutiny period. The tentative start of for consultations (see Appendix) reflects the minimum time necessary to launch the consultations once the Delegated Acts are out.

3. Key Assumptions

9. No public consultations will be launched before the adoption by the Commission of the Delegated Acts for the VS and the simplified ESRS. Preparatory and technical work may commence in advance where appropriate.
10. Deliverables for the second half of 2026 are indicative and subject to regulatory and market developments, reflecting stakeholders' input and the output of the Agenda consultation.
11. Interoperability continues to play an important role, to avoid double reporting and contribute to international convergence. The interoperability work will be aligned with international standard-setters' consultation timelines.

4. Overview of 2026 Priorities

12. The 2026 work program is structured around the following priority areas intended to support the effective and proportionate application ESRS and VS, while ensuring legal certainty, market readiness and international interoperability:
 - Standard-setting activities: N-ESRS;
 - Education and capacity building, particularly for SMEs (continuation of the work started in 2025);
 - Development of the implementation support mechanisms for revised ESRS.
 - Digitalisation (including ESRS XBRL taxonomy, the list of ESRS requirements in XLS) and development of the interactive ESRS Knowledge Hub;
 - Interoperability with international sustainability reporting frameworks, prioritising IFRS/SASB, GRI and GHG Protocol, given their applicability to

ESRS reporters and given the importance of avoiding double reporting when European companies will also have to report under IFRS.

13. Next to these priority areas, EFRAG will consult its stakeholders on their needs for future implementation support in relation to the VS and the simplified ESRS. For this purpose, EFRAG plans to undertake an Agenda consultation in July (tentative timeline).
14. The proposed priorities take into account the regulatory sequencing established under the CSRD, the timing of the adoption of ESRS and VS Delegated Acts, and feedback received from stakeholders during the initial implementation phase. Emphasis is placed on implementation support, usability and burden reduction, including for small and medium-sized undertakings, while safeguarding the policy objectives underpinning the EU sustainable finance framework.

5. Standard-Setting Activities

5.1. N-ESRS Draft Standard Based on Simplified ESRS

15. The 2026 work programme envisages the preparation of EFRAG's technical advice on N-ESRS for non-EU undertakings falling within the scope of Article 40a of the CSRD. The delivery of this advice to the European Commission is expected by end of January 2027 (tentative) and will follow EFRAG's due process requirements.
16. The development of the N-ESRS draft standard is expected to include a public consultation and the preparation of an Exposure Draft accompanied by Basis for Conclusions. A Cost Benefit Analysis will also be delivered with the final Advice to the EC. Internal preparatory drafting work is foreseen once a stable draft of the Delegated Act on simplified ESRS becomes available, currently anticipated in April 2026, while certain preparatory activities may be undertaken earlier to support timely delivery.
17. A public consultation is envisaged to take place between mid-July and mid-October 2026. EFRAG will target stakeholders of the different jurisdictions where the groups affected by the reporting are headquartered. A dedicated outreach plan with workshops held on different time zones is envisaged, with the cooperation of organisations and standard setters in those jurisdictions to the maximum extent possible.
18. The text will reflect the content of the ESRS as issued by Delegated Act in June 2026, and the elements to be excluded from that text, following Article 40 (a) of the CSRD.

5.2. Continuation of the SME Ecosystem

19. Non-listed SMEs and micro-undertakings, which are not subject to sustainability reporting requirements under the CSRD, receive requests for sustainability information from customers, banks, investors or other stakeholders. In its 2023 SME Relief Package the European Commission indicated that it would ensure that SMEs have a voluntary, simple and standardised methodology to report on ESG issues. With this purpose and to reduce burden and facilitate SME's access to sustainable finance, EFRAG issued a simple, voluntary reporting standard for use by non-listed SMEs (VSME) in December 2024. The EC endorsed the VSME by means of a recommendation in July 2025.
20. The Omnibus I directive envisages that the European Commission issues a Voluntary Standard (VS) as Delegated Act, based on VSME, which will be available for use by companies (SMEs and other companies with up to 1000 employees) that are outside the revised scope of the CSRD. This Delegated Act is expected to be issued in June 2026.
21. Thanks to the funding provided by the Pilot project, in 2025 EFRAG started a stream of activities to provide support to SMEs, under the umbrella term 'VSME Ecosystem', including the constitution of a Forum of organisations, national standard setters and other institutions with an interest in SME sustainability reporting. This led to the issuance of a number of technical documents and reports. In 2026, EFRAG plans to continue this work.
22. Following the content of the Omnibus I directive, this workstream will be renamed 'SME Ecosystem'. Building on activities initiated in 2025, the programme in 2026 foresees the continuation of the SME Forum as a key platform for structured dialogue between preparers, users, platforms and public authorities. In parallel, EFRAG plans to continue the mapping of digital platforms, initiatives and tools supporting VS reporting, with a view to improving comparability and accessibility across the ecosystem, and to support the adoption of common practices across different Member States.
23. Outreach activities are expected to remain a central component of the ecosystem approach, supporting awareness-raising and feedback collection across Member States.
24. From the second half of 2026, the work programme foresees the development of VS supporting guides, aimed at providing practical assistance to SMEs in applying the VS in a proportionate manner. EFRAG will also launch the second acceptance progress survey on the use of the VS Standard and its Digital Template in order to assess early uptake, identify practical challenges and inform future support activities.
25. In addition to these continuation activities and to further strengthen the SME ecosystem, EFRAG also envisages conducting research on market practices, based on the collection of existing VSME reports (reporting years 2024 and or

- 2025) with the objective of identifying emerging practices and informing future guidance.
26. Depending on the outcome of the agenda consultation and stakeholder input (see below), EFRAG may start a structured Q&A or similar mechanism in the second half of 2026, designed to collect recurring VS implementation questions and address them in the most efficient way.
 27. The programme further envisages the development of educational materials and training modules on VS within the ESRS Knowledge Hub, in order to support capacity-building, particularly for first-time reporters. Technical enhancements to the XBRL taxonomy and the Digital Template are expected to continue, supporting usability, interoperability and digital readiness.
 28. Finally, EFRAG Secretariat plans to test a verification mechanism for a limited number of digital platforms identified in the initial mapping exercise, to assess the level of alignment of templates used by those platforms with the content of the standard, based on their self-assessment. This activity is intended to explore approaches to reliability and consistency within the VSME digital ecosystem, without creating additional reporting obligations for SMEs.

6. Interoperability with International Standards

29. Interoperability with international sustainability reporting initiatives remains a central strategic consideration in 2026. EFRAG is expected to continue contributing, from a European perspective, to the development and revision of international standards, with the objective of limiting reporting fragmentation and avoiding unnecessary duplication for EU undertakings.
30. Planned activities include:
 - The preparation of responses to consultations launched by international standard-setters, including the ISSB/SASB, GRI and the GHG Protocol;
 - Updates to interoperability mappings following the adoption the Delegated Act for simplified ESRS;
 - Technical engagement, including at Secretariat level, with other initiatives;
 - Further progress on digital interoperability, where feasible and appropriate.
31. Where consultation timelines do not permit full public consultation on EFRAG draft responses, and depending on the priority of the different consultations, alternative outreach mechanisms, including targeted stakeholder workshops, will be explored to ensure that EU perspectives are adequately reflected.

7. Digitalisation and ESRS Knowledge Hub

32. Digitalisation is recognised as a key enabler for the effective application of ESRS and VS. In 2026, the work programme will ensure continued progress on both technical digital deliverables and the enhancement of the ESRS Knowledge Hub, (which acts as the EU digital portal identified in the Omnibus I directive), as a central reference platform.

33. Key deliverables are expected to include:

- The preparation of the XLS based list of requirements (previously Implementation Guidance 3, IG 3) based on simplified ESRS;
- The development of an updated ESRS XBRL taxonomy, supporting machine-readability and integration into the European Single Electronic Format (ESEF);
- Further enhancement of the ESRS Knowledge Hub, including interactive functionalities, the final text of the simplified ESRS in an interactive format and user support tools.

34. Additional developments, such as multilingual content, educational modules and AI-assisted navigation, are subject to funding availability and governance decisions.

8. Education

35. Education activities are intended to support consistent and high-quality application of ESRS and the VS.

36. The work programme foresees:

- The development of educational materials, including explanatory videos and guidance;
- The preparation of structured training content to support future learning initiatives.

37. These activities are expected to be closely coordinated with the ESRS Knowledge Hub to ensure accessibility across Member States.

9. Implementation Support and Agenda Consultation

38. In 2026, implementation support activities are expected to focus primarily on process design rather than the immediate issuance of new guidance, pending the outcome of an agenda consultation and the adoption of relevant Delegated Acts.

39. Planned activities include:

- Reviewing the approach and design of future implementation activities for the VS and for ESRS. This will be done in two steps:
 - Obtaining preliminary stakeholders' input on the needs for future guidance (implementation guidance, Q&A mechanisms, other) and on how to design an effective mechanism for delivering this material to companies and other users, leveraging on lessons learned in EFRAG support activities in 2024 and early 2025.
 - Agenda Consultation: based on the preliminary input collected in the first step, the EFRAG SRB will develop options, consult on them, and agree on the approach and process for future implementation support, based on the feedback of the consultation.
- As part of the Agenda Consultation, consult by the end of June/mid-July on the priority topics that should be addressed in the future EFRAG implementation activities. For the material that will support the implementation of VS this will be done in conjunction with the SME Ecosystem described above and leveraging the role of the SME Forum.
- EFRAG Secretariat will conduct in the first half of the year a market study, involving companies and other stakeholders that have an interest in voluntary reporting by non-SME-companies outside the scope of the CSRD. This will aim at understanding the emerging market trends and forces at play in voluntary reporting, as an input to the discussion on future approach and content of implementation guidance for the VS.
- Implementation support or illustrative material on Anticipated Financial Effects, for companies reporting under ESRS, to the maximum extent possible jointly with the ISSB. Tentative timeline for the completion is the end of 2026.
- Depending on the outcome of the activities described above, EFRAG may start the preparation of implementation support materials in the second

half of the 2026, for ESRS and for the VS, including for non-SME companies.

40. In parallel, EFRAG envisages updating the State of Play report already issued in 2025, in order to assess emerging ESRS reporting practices. A similar report will also be issued for reports prepared in compliance with VSME (see above).

APPENDIX: Tentative timeline for EFRAG public consultations

Actual timeline may deviate depending on timing of issuance of the Exposure Drafts by the other standard setters (for interoperability work) and due to effective time necessary to EFRAG to execute the different steps.

| Consultation | Tentative start | Tentative end |
|--|--|---------------------------------|
| N-ESRS Exposure Draft | Mid-July | Mid-October |
| EFRAG comment letter on SASB Amendments, ISSB BEES Exposure Draft, GHG Protocol consultation documents | EFRAG will issue a draft as soon as the Exposure Draft is published and the consultation period will be half of the SASB/ISSB/GHGP one | |
| List of ESRS requirements in XLS and ESRS XBRL taxonomy | Mid-July | 90 or 60 days (to be confirmed) |
| EFRAG Agenda consultation | July | October |

In addition EFRAG may involve European stakeholders to provide input to the comment letters on other standard setting initiatives, such as in workshops and interviews following a public call for input.