

This paper has been prepared by the EFRAG Secretariat for discussion at a public meeting of EFRAG SR TEG. The paper forms part of an early stage of the development of a potential EFRAG position. Consequently, the paper does not represent the official views of EFRAG or any individual member of the EFRAG SRB or EFRAG SR TEG. The paper is made available to enable the public to follow the discussions in the meeting. Tentative decisions are made in public and reported in the EFRAG Update. EFRAG positions, as approved by the EFRAG SRB, are published as comment letters, discussion or position papers, or in any other form considered appropriate in the circumstances.

Cover note

GRI consultation on Workers' rights and protections – Comment letter

Objective

To discuss and approve EFRAG's Comment Letter on the revision of GRI's Workers' rights and protections.

Background

1. GRI has been working on the revision of its Labour standards since 2024. The last set of Labour standards that are being revised are GRI Workers' rights and protection standards. Specifically, these are the four topical standards described below:
 - GRI LRBR: Labor Rights in Business Relationships
 - GRI FACB: Freedom of Association and Collective Bargaining
 - GRI CL: Child Labor
 - GRI FL: Forced Labor
2. GRI launched the publication of the Exposure drafts for these four topical standards ("EDs") on the 10 December 2025. The public comment period will conclude on the 9 March 2026.
3. GRI Standards are referred to in CSRD as well as in draft ESRS 1 AR5 in the revised ESRS as a source of entity-specific information. In this respect, GRI Standards are relevant for ESRS and therefore it is meaningful to contribute to the GRI public consultation to express the European views.
4. **EFRAG Process followed**
5. EFRAG Secretariat presented a preliminary analysis of GRI's EDs with a focus on interoperability with the revised ESRS on the 5 February 2026 SR TEG meeting and 12 February 2026 SRB meeting. Following the SR TEG and SRB meetings, written feedback was obtained from the members.

6. In parallel, EFRAG adopted the best practices for engagement with the European Union stakeholders when issuing comment letters. In this case, the public consultation was not a viable alternative as EFRAG started to work on the revision of GRI's EDs once the Omnibus deliverables were issued to the European Commission in December 2025 . The tight timeline allowed for EFRAG to arrange two workshops ¹ with European Union stakeholders on the 17 and 19 February 2026 following a public call for participants.
 7. Feedback from the two workshops and the surveys shared by the participants have been incorporated in the comment letter. The points that were raised in relation to feasibility of the GRI's EDs have also been included and clearly identified.
- 8. Next steps**
9. Following its approval, EFRAG will seek the SRB approval on the 11 March 2026.

Questions for the SR TEG

10. Does the SR TEG approve EFRAG's Comment Letter?

Agenda Papers

11. In addition to this cover note, the agenda paper for this session is:
 - a. Agenda paper 04-01 – EFRAG Comment Letter;

¹ <https://www.efrag.org/en/news-and-calendar/news/help-shape-europes-voice-on-the-new-gri-labor-standards-exposure-drafts-join-efrags-workshops>