

ESRS E4 Biodiversity and Ecosystems

UNAPPROVED DRAFT

November 2025 – Comparison between ED (July) and V1 (November)

ESRS E4 Biodiversity and Ecosystems – November 2025 – ED TO V1

Status of this draft:

Implemented in this draft:

- Suggestions from an extended sample group and outreaches
- SRB strategic directions
- FISMA detailed English and editorial review
- Suggestions from remaining respondents (if any)
- Horizontal editorial review across standards

Still outstanding (not yet in this draft):

- internal cross-references (numbers of paragraphs) still to be updated
- English review of the markup text

Revised structure and drafting conventions

As compared to ESRS Set 1 (Delegated Regulation (EU) 2023/2772 adopted by the European Commission in July 2023), the structure of the Standards has been revised and streamlined.

- All the ‘shall disclose/shall include/shall report/shall describe/shall explain’ are presented in the main body of the Standard. They have been counted as separate datapoints.
- Below the text of each Disclosure Requirement (DR) in topical standards (or chapter for ESRS 1), boxed content presents the streamlined corresponding mandatory methodological guidance, which is still named ‘Application Requirements’ (ARs). This includes ‘shall consider’ as element of methodology for preparing the disclosure, and ‘may (present)’ for presentation options – which does not represent voluntary disclosure but brings flexibility on how to present the disclosure.
- All the ‘may’ disclosures have been either eliminated or redrafted as application requirements (which do not include separate datapoints but methodology content).
- A minority of the deleted datapoints is gathered in a document named ‘Non-Mandatory Illustrative Guidance’ (NMIG) and has been redrafted to fit this classification. While the content of ‘shall disclose’ datapoints in the main body of the standard and of application requirements are drafted to become part of the delegated act, the legal status of the NMIG (either as appendices in the Delegated Act or as document to be issued by EFRAG independently of the Delegated Act) will be considered by the European Commission (EC) in due course. EFRAG recommends NMIG not to be part of the Delegated Act.
- The ESRS use several terms to indicate similar concepts: matters, topic, sub-topic, sub-subtopic. In Amended ESRS ‘sub-subtopics’ have been eliminated. In addition, to simplify the content and eliminate one term (matter), the Standards only refer to topics and sub-topics. For this reason, in all the documents the term ‘matter’ has been replaced by ‘topic’ where ‘topic’ is meant to refer either to topic or sub-topic depending on the context of the relevant disclosure. When used in this way, the bold italic format is used (***topic***), as this is a defined term. When used to express one of the 10 topics in Appendix A of [Draft] Amended ESRS 1, a normal font is used.
- The paragraph numbering has been revised to reflect the draft amendments. Where applicable, the paragraph number of the 2023 Delegated Act is indicated in brackets—for example, ‘4. (24)’ or ‘4. (24 amended)’ in paragraph [Draft] Amended ESRS 1.

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Objective

1. (1 amended) When reporting in accordance with the ESRS, the The **sustainability statement** shall cover information in relation to E4 '**Biodiversity and Ecosystems**', when Ecosystems, if this **topic** relates to material **impacts, risks and opportunities**. The DR on the material impacts, risks and opportunities is expected to cover **policies, actions and targets** (if in place), **dependencies** when relevant, **metrics** and the related **financial effects**. all the reporting areas listed in paragraph 5 of ESRS 1 General Requirements. When only one particular sub-topic prescribed by this Standard is material, paragraph 30 of ESRS 1 General Requirements applies.
2. (1 amended) The objective of this Standard is to specify Disclosure Requirements (DRs) in relation to these items of information the reporting areas mentioned in paragraph 1, that are not covered in [Draft] Amended ESRS 2 *General Disclosures*. This standard shall be applied in conjunction with ESRS 1 *General Requirements* and ESRS 2 *General Disclosures*.
3. ~~When only one of the sub-topics covered by this Standard is material, the undertaking shall report only on that sub-topic.~~
3. In this Standard, each DR is introduced by a disclosure objective, except for **policies, actions and targets**, for which the provisions in ESRS 2 *General Disclosures* GDR-P, GDR-A and GDR-T provide the necessary framing for the relevant DRs.
4. This Standard sets out DRs related to **biodiversity** and **ecosystems** and in particular, particularly, with respect to the following closely interlinked sub-topics: **drivers of biodiversity and ecosystem change** (terrestrial and marine habitat change, invasive species); the state of species; the extent and condition and **extent of terrestrial, freshwater and marine ecosystems**; and **ecosystem services**.
5. (8 amended) The undertaking shall apply the provisions of [Draft] Amended ESRS 2, paragraphs 29–32, and GDR-P, GDR-A, GDR-T and GDR-M. In particular:
 - (a) if the undertaking has not adopted **policies, actions and targets** with reference to a **topic** related to material **impacts, risks and opportunities**, it shall disclose this fact;
 - (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative.
6. ~~In this Standard, each DR is introduced by a disclosure objective, with the exception of **policies, actions and targets**, for which the provisions in [Draft] Amended ESRS 2 GDR-P, GDR-A and GDR-T provide the necessary framing for the relevant DRs.~~
- 7.5. (3 amended) The terms '**biodiversity**' and '**biological diversity**' refer to the variability among living organisms from all sources including, inter alia, terrestrial, **freshwater**, marine and other aquatic **ecosystems** and the ecological complexes of which they are part.
8. (1(c) amended) The objective of this Standard shall also enable users of the sustainability statement ESRS E4 Biodiversity and Ecosystems relates to understand the plans and capacity of the undertaking to adapt its strategy EU regulatory frameworks and business model in line with:
 - (a) ~~other relevant frameworks, including, the vision of the Kunming-Montreal Global Biodiversity Framework and its relevant goals and **targets**;~~
 - (b) ~~relevant aspects of the EU Biodiversity Strategy for 2030;~~
 - (c) ~~Directive 2009/147/EC of the European Parliament and of the Council and Council Directive 92/43/EEC (EU Birds and Habitats Directives);~~
 - (d) ~~Directive 2008/56/EC of the European Parliament and of the Council (Marine Strategy Framework Directive) and the 2023 EU Marine Action Plan; and~~

(e) 6. , Directive 2000/60/EC of the European Parliament (EU Water Framework Directive); and Regulation (EU) 2024/1991 of the European Parliament and of the Council (Nature Restoration Regulation).

9.7. ~~Location~~Context-specific considerations are particularly important in relation to **biodiversity** and **ecosystems**. ~~When~~If material **impacts, risks** or **opportunities** arise at local level are related to specific **geographies**, it is important to consider appropriate ~~aggregation or disaggregation or aggregation of~~ the reported information, e.g. by **site**, asset, location, affected local ecosystem or other appropriate level in accordance with [Draft] Amended ESRS 1, paragraph 53 **General Requirements**, Chapter 3.3.2 **Level of Aggregation, Disaggregation**.

Interaction with other ESRS

10.8. (4, 5(a) amended) Social and environmental **topics** closely interact with each other. For instance, direct **drivers of biodiversity and ecosystems** change are **climate change, pollution**, land-use change, **freshwater**-use change and sea-use change, direct exploitation of organisms and **invasive alien species**. These drivers are covered in this Standard, except for climate change and pollution, which are addressed by [Draft] Amended ESRS E1 **Climate Change** and [Draft] Amended ESRS E2 **Pollution**. The main points of interaction between ESRS E4 **Biodiversity and ecosystems** and the different ESRS other topical standards are the following:

- (a) (5(a) amended) [Draft] Amended ESRS E1 **Climate Change** addresses **greenhouse gas ('GHG') emissions** and energy resources (energy consumption), while impacts of **climate change mitigation, climate change adaption** and energy, whereas **impacts on biodiversity and ecosystems** related to the undertaking's activities addressing climate mitigation and adaption are addressed in **ESRS E4 Biodiversity and Ecosystems**;
- (b) (5(b) amended) [Draft] Amended ESRS E2 **Pollution** addresses the emissions of **pollutants** to air, water and **soil**, and the **manufacturing, use, generation and emission/release** of **microplastics**, ~~while~~whereas impacts of pollution on biodiversity and ecosystems are addressed in **ESRS E4 Biodiversity and Ecosystems**;
- (c) (5(c) amended) [Draft] Amended ESRS E3 **Water** addresses the use of water resources, ~~while~~whereas impacts on biodiversity and ecosystems related to the use of water are addressed in **ESRS E4 Biodiversity and Ecosystems**;
- (d) (5(d) amended) [Draft] Amended ESRS E5 **Resource Use and Circular Economy** addresses the type and quantification **circularity** of **resource inflows, including marine resources, waste** and the implementation of **circular economy principles**, ~~while~~whereas the impacts on biodiversity and ecosystems ~~related to~~ these topics are addressed in **ESRS E4 Biodiversity and Ecosystems**; and
- (e) (6 amended) [Draft] Amended ESRS S3 **Affected Communities** addresses material negative impacts on **affected communities** **arising** from biodiversity and ecosystems-related impacts attributable to the undertaking.

Disclosure Requirements

Strategy

Disclosure Requirement E4-1 – Transition plan for biodiversity and ecosystems transition plan

11.9. (12 amended) The objective of this DR is to enable an understanding of the undertaking's response and contribution to the transition implied by the Kunming-Montreal Global Biodiversity Framework, ~~when (GBF),~~ if it has in place **and made public** a **biodiversity and ecosystems transition plan**.

12.10. (15 amended) If the undertaking has in place and has made public a **biodiversity and ecosystems transition plan** to transform its **business model** and strategy so **that it is aligned with** ~~contributes to~~ the global goal of halting and reversing **biodiversity loss**, as stated in the Kunming-Montreal Global Biodiversity Framework ~~GBF~~, it shall disclose ~~its~~the key features of that plan.

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<p>AR 1 for para. 1210 (Biodiversity and Ecosystems Transition plan for biodiversity and ecosystems)</p>	<p>Transition plans for biodiversity and ecosystems are expected to address similar elements than Biodiversity can also be part of an undertaking's broader transition plans for plan that, for instance, addresses climate change mitigation. This includes Biodiversity and ecosystems transition plans, or plans that integrate biodiversity, contain information on targets, key actions, financial planning, and governance of the plan – but. They are also expected to include a clear explanation of how the undertaking's strategy and business model will evolve to become compatible contribute to with relevant the global goals, such as goal of halting and reversing global biodiversity loss set out in line with the GBF, – and can include the identification and management of synergies and trade-offs with other transition plan objectives, including any response and contribution to the transition implied by the Paris Agreement.</p>
<p>AR 2 for para. 10 (Biodiversity and Ecosystems Transition Plan)</p>	<p>'Has made public' means that the undertaking has made its biodiversity and ecosystems transition plan available, before or at the time of the release of its sustainability statement, through accessible public channels such as its website or reports.</p>

Impact, risk and opportunity management

Disclosure Requirement E4-2 – Policies related to biodiversity and ecosystems

13-11. (22 amended) The undertaking shall disclose its **biodiversity** and **ecosystems policies** in accordance with the provisions of [Draft] Amended ESRS 2 *General Disclosures* GDR-P.

14-12. In addition to the provisions of [Draft] Amended ESRS 2 *General Disclosures* GDR-P, the undertaking shall describe the content of its **biodiversity** and **ecosystems**-related **policies** related with respect to:

- (a) (23(d) amended) supporting the traceability of **products**, components and **raw materials** with material that have **actual or potential material impacts** on biodiversity and ecosystems along the upstream and downstream in its **value chain**; and
- (b) (24(a) amended) **sites** in its own operations that are in or near a **biodiversity sensitive area**.

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<p>AR 3 for para. 1113 (Policies related to biodiversity and ecosystems)</p>	<p>When describing the content of its policies the undertaking shall specify, where relevant applicable, whether they address (24(b) amended) sustainable land / agricultural practices; (24(c) amended) sustainable oceans / seas practices; and (24(d) amended) deforestation.</p>
<p>AR 4 for para. 1311 (Policies related to biodiversity and ecosystems)</p>	<p>(18 amended) Biodiversity and ecosystems scenario analysis can inform the identification, assessment and management of material risks and opportunities over short, medium and long-term time horizons. The undertaking can consider the use of scenario analysis when defining its policies, actions and targets.</p>
<p>AR 25 for para. 1412 (a) (Policies related to biodiversity and ecosystems)</p>	<p>Paragraph 12(a) refers to tangible or physical products and does not apply to financial products.</p>
<p>AR 68 for para. 12 (a)20 (Metrics Policies related to biodiversity and ecosystems change)</p>	<p>If the undertaking's site is in or near a biodiversity sensitive area, it is highly likely that its activities will be related to material negatively impacts on affect the area. Whether an undertakings site, which is outside of a biodiversity sensitive area, is near such an area shall be determined:</p>

[NOTE: Moved here from E4-5]	<p>(a) by <u>by defining the site's area of influence. The area of influence can be determined by applying the capacity of activities related to the site to negatively affect species and ecosystems in the biodiversity sensitive area;</u></p> <p>based on a buffer zone distances specific to the its type of activity, and the species and ecosystems in the area. Buffer zones can be determined following regulatory requirements, science-based recommendations and industry best practice, and science-based recommendations, such as by the Integrated Biodiversity Assessment Tool (IBAT) or based on findings of a site-level survey.</p>
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Disclosure Requirement E4-3 – Actions and resources related to biodiversity and ecosystems

15.13. (27 amended) The undertaking shall disclose its key **biodiversity** and **ecosystems**-related **actions**, and significant resources allocated to their implementation, in accordance with the provisions of [Draft] Amended-ESRS 2 *General Disclosures* GDR-A.

16.14. (28 amended) In addition to the provisions of ESRS 2 *General Disclosures* GDR-A, the undertaking shall describe the **any biodiversity offsets** used ~~in~~ as part of its action plans, if any **actions**, including the aim of the offsets, the financing effects in monetary terms, the area, type, the quality criteria applied, and the standards that with which the biodiversity offsets comply with.

APPLICATION REQUIREMENTS

<p>AR 75 for para. 137</p> <p>(Targets Actions related to biodiversity and ecosystems)</p> <p>[NOTE: moved from AR under E4-4 targets]</p>	<p>(AR 23 amended) Actions to be <u>When disclosing information required under paragraph 137 for the purpose of setting targets</u> the undertaking shall consider the <u>need right to</u> for a free, prior and informed consent of local and indigenous peoples (see also ESRS S3-2), the need for appropriate consultations and the need to respect the decisions of these communities.</p>
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Metrics and Targets

Disclosure Requirement E4-4 – Targets related to biodiversity and ecosystems

17.15. (31 amended) The undertaking shall disclose its **biodiversity** and **ecosystems targets**, in accordance with the provisions of [Draft] Amended-ESRS 2 *General Disclosures* GDR-T.

18.16. (31, 32(e) amended) If the undertaking uses **biodiversity offsets** in setting its **targets**, the DR required by paragraph 17 it shall includedisclose how itthese offsets were used them.

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<p>AR 8 for para. 15</p> <p>(Targets related to biodiversity and ecosystems)</p>	<p><u>Biodiversity-related targets:</u></p> <ul style="list-style-type: none"> Typically address 'pressures' on nature and aim at reducing the drivers of biodiversity and ecosystem change (e.g., avoiding land-use change due to the conversion of forest land) as well as address the 'state of nature' and aim to improve the ecosystem extent and condition and species (e.g., increasing the population size of species at extinction risk or restoring a landscape condition compared to a baseline level); are most effective if they are science-based and aligned with ecological thresholds and contribute to the targets of the GBF; can be set at different levels (see ESRS 2 <i>General Disclosures</i> para. 51(c), e.g. at site, landscape, company or upstream value chain level,
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	<p>depending on the goal of the target and the capacity of the undertaking to influence its achievement;</p> <ul style="list-style-type: none"> are typically implemented in accordance with the mitigation hierarchy: avoidance, minimisation, restoration and compensation.
<p>AR 5 for para. 17</p> <p>(Targets related to biodiversity and ecosystems)</p> <p>[NOTE: AR moved to E4-3 and amended.]</p>	<p>(AR 23 amended) When disclosing information required under paragraph 17 for the purpose of setting targets the undertaking shall consider the need for a free, prior and informed consent of local and indigenous peoples, the need for appropriate consultations and the need to respect the decisions of these communities.</p>

Disclosure Requirement E4-5 – Metrics related to biodiversity and ecosystems change

19-17. (34 amended) The objective of this DR is to enable an understanding of the performance of the undertaking against material **biodiversity** and **ecosystems** change-related **impacts, risks** and **opportunities**.

20-18. (16(a), 19(a) and 35 amended) The undertaking shall disclose the following information for material **biodiversity** and **ecosystem** change -related **impacts, risks** or **opportunities**:

- (16(a)(ii) amended) the locations in its own operations to which the material impact, risks or opportunities relate;
- (16(a)(iii) amended) for those locations, if applicable, a list of **biodiversity-sensitive area(s)** (name and type) related to the undertaking's material negatively affected (name and type) impacts, if any; and
- (16(a)(i) amended) the undertaking's for (b) above, the activities that are related to material impacts negatively affecting those in the biodiversity-sensitive areas described in (b) above.

21-19. (33, 36, 38-41 amended) In addition to paragraph 2018 and in accordance with [Draft] Amended ESRS 2 *General Disclosures* GDR-M, the undertaking shall report **metrics** related to its material impacts on **biodiversity** and **ecosystems**.

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<p>AR 97 for para. 1820</p> <p>(Metrics related to biodiversity and ecosystems change)</p>	<p>Information to be disclosed under this paragraph applies for those locations:</p> <p>(a) where the undertaking has identified material impacts, risks and opportunities arising from its direct operations or that are significant drivers of material impacts, risks and opportunities; and/or</p> <p>(b) the undertaking has To inform the prioritisation for disclosure and the level of disclosure aggregation, the undertaking shall consider them (e.g. for management attention, resource allocation, and monitoring), due to their relevance for achieving sustainability related objectives covered by its policies, actions and targets (if any); and/or</p> <p>the assets and/or activities from own operations in those locations where the undertaking's own operations are related to material interact negatively impacts on with biodiversity sensitive areas.</p> <p>The undertaking is not necessarily expected to disclose this information for each of its individual sites and can aggregate information to relevant groups of sites related to its material impacts, risks and opportunities, for example based on the same biodiversity sensitive area or cluster of areas in a region affected by multiple sites, in accordance with ESRS 1 <i>General Requirements</i> Section 3.3.2.</p>
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<p>AR 8 for para. 20(a) (Metrics related to biodiversity and ecosystems) [NOTE: Moved to E4-2]</p>	<p>If the undertaking's site is in a biodiversity sensitive area, it is highly likely that its activities will negatively affect the area. Whether a site, which is outside of a biodiversity sensitive area, is <i>near</i> such an area shall be determined:</p> <p>by the capacity of activities related to the site to negatively affect species and ecosystems in the biodiversity sensitive area;</p> <p>based on a buffer zone specific to the type of activity and the species and ecosystems in the area. Buffer zones can be determined following industry best practice and science-based recommendations, such as by the Integrated Biodiversity Assessment Tool (IBAT) or based on findings of a site-level survey.</p>
<p>AR 106 for para. 1921 (Metrics related to biodiversity and ecosystems change)</p>	<p>When providing description of material impacts, risks and opportunities in accordance with [Draft] Amended ESRS 2 <i>General Disclosures</i> IRO-2, the undertaking shall indicate which material impacts concern (16(b) amended) land degradation, desertification or soil sealing, and (16(c) amended) operations that affect threatened species or ecosystems.</p>
<p>AR 911 for para. 2119 (Metrics related to biodiversity and ecosystems change)</p>	<p>Depending on which sub-topic is assessed to be material, the undertaking shall include metrics in relation to:</p> <ul style="list-style-type: none"> (a) drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species);; (b) the state of species (e.g. related to extinction risk); (c) the condition and extent and condition of terrestrial and marine ecosystems (e.g. related to site condition and landscape condition); and (d) ecosystem services.
<p>AR 102 for para. 1921 (Metrics related to biodiversity and ecosystems change)</p>	<p>Primary data on the Where possible measurement at site using state of nature metrics collected at location level or through remote sensing is the best means suited to help determine impacts on biodiversity and ecosystems. Using primary data on the state of nature Measurement at site is especially relevant where the undertaking's those sites are in or near biodiversity sensitive areas. The undertaking can also Where measurement at site is not feasible, estimate on using measurement of its impacts by using primary data on impact drivers or secondary data on the estimates of state of nature can be used.</p>
<p>AR 121 for para. 1921 (Metrics related to biodiversity and ecosystems change)</p>	<p>When identifying metrics to disclose, the undertaking shall consider:</p> <ul style="list-style-type: none"> (a) (27(f) amended) the frequency of monitoring, and the baseline condition/ value and baseline year/period; and (b) whether the metrics enable users to understand how they relate to the material impacts.