

FESI comparative overview of the Omnibus I positions (FESI - Parliament - Council)

November 2025

1. Introduction

The first Omnibus package (Omnibus I) on simplifying reporting requirements was published by the European Commission on 26 February 2025. The Commission acted on its target to achieve at least 25% reduction in administrative burdens, and at least 35% for SMEs until the end of this mandate. This first 'Omnibus' package will bring simplification to the **Corporate Sustainability Reporting Directive (CSRD)**, **Corporate Sustainability Due Diligence Directive (CSDDD)**, **Taxonomy Regulation**, and **Carbon Border Adjustment Mechanism (CBAM)**.

2. Applicability of Omnibus I

The current Omnibus package is composed by 4 main legislative proposals. These proposals will need to be discussed, amended, and approved by both the Parliament and Council.

- 1) Legislative changes to CSRD, CSDDD, Taxonomy: **currently being discussed at Parliament Committee and Council level.**
- 2) Legislative changes to CBAM: **entered into force and applicability on 20 October 2025.**
- 3) New, delayed applicability dates for CSRD (**waves 2 and 3 to report in 2028 and 2029 instead of 2026 and 2027**) and CSDDD (**first companies in scope from 2028 instead of 2027**) to be applied from **31 December 2025.**

3. Relevance of this overview

The Omnibus I proposal is currently being discussed in both the Parliament and the Council. The two institutions will eventually have to find a compromise agreement before adopting the final legislation.

- i. At Parliament level, the Rapporteur of the main Committee in charge (JURI) has drafted a report with suggested amendments to the Commission proposal (below as 'Parliament Rapporteur Report').
- ii. This report was amended to form a new position and voted on by the JURI committee members on 13 October.
- iii. The Parliament then voted on whether to directly adopt the position and directly move to the interinstitutional negotiations on 22 October. This vote was rejected.
- iv. MEPs submitted new amendments and voted on the revised position in November. The revised position (mostly supported by right-wing and far-right wing parties, was adopted on 13 November (below as **Parliament position**).
- v. In parallel, the Council reached its own negotiating mandate in June: the General Approach (below as **Council General Approach**).
- vi. On 18 November, interinstitutional negotiations between the Council and Parliament ('trilogues') officially started to find a final compromise.

4. Proposed changes to the Omnibus compared to FESI, Parliament and Council's positions

CSDDD					
TOPIC	ORIGINAL TEXT	OMNIBUS COMMISSION PROPOSAL	FESI POSITION PAPER	PARLIAMENT POSITION	COUNCIL GENERAL APPROACH

SCOPE	At least 1000 employees , and over EUR 450 million net turnover or €450 million in net EU turnover (for non-EU companies)	At least 1000 employees , and over EUR 450 million net turnover (for EU companies) or EUR 450 million in net EU turnover (for non-EU companies)	/	More than 5000 employees and over EUR 1.5 billion net turnover (for EU companies) or more than EUR 1.5 billion net EU turnover (for non-EU companies)	More than 5000 employees and over EUR 1.5 billion net turnover (for EU companies) or more than EUR 1.5 billion net EU turnover (for non-EU companies)
HARMONISATION	/	Maximum harmonisation for identification duty, duties to address adverse impacts, duty to provide complaint procedure	Harmonisation extended to all provisions	More articles added under maximum harmonisation: provisions on due diligence at group level, identification duty, the duties to address adverse impacts that have been or should have been identified, prioritisation, the duties to engage with stakeholders in certain cases, and the duty to provide for a complaints and notification mechanism	Full harmonisation to be expanded to core aspects of due diligence process
RISK-BASED VS TIER 1			Phase in of risk-based approach	Risk-based approach- scoping based on reasonably available	Risk based approach applied to Tier 1

	Risk-based approach for all chain of activities	No risk-based approach but focus on Tier 1	starting from Tier 1	information and where impacts are most likely to occur. If relevant and verifiable information is available about severe and likely to occur impacts, a further assessment will be needed.	
SME SHIELD/VALUE CHAIN CAP (CSRD, CSDDD)	Companies in scope may request information to their SME partners	CSRD: prohibition on information requests to business partners with <1000 employees beyond what's contained in the CSRD Voluntary Reporting Standards (VSME) CSDDD: similar prohibition on business partners with <500 employees	Companies in scope may request information to their business partners if contained in the ESRS for Listed SMES (LSME) + information commonly shared between undertakings in the sector concerned + right for SMEs to refuse information	CSRD: no information requests to business partners with <1750 employees and a net turnover of more than EUR 450 000 000 CSDDD: limiting info requests during further assessment phase to a last resort for business partners with <5000 employees	CSRD: no information requests to business partners with <1000 employees, only if it cannot be obtained by any other means. CSDDD: limiting information requests during scoping phase of risk identification to what is necessary for business partners with <1000 employees

PLAUSIBLE INFORMATION	/	Companies should only go beyond Tier 1 if there is plausible information of risk	Plausible information to go beyond Tier 1 should be clarified and substituted with 'substantiated knowledge'	Deleted	Deleted: companies should only go beyond Tier 1 if there is reasonably available information of risk: objective and verifiable information
SUSPEND/TERMINATE BUSINESS RELATIONSHIP	Disengage or terminate relationship if all due diligence steps have failed	No obligation to terminate relationship but to suspend in some cases	Clarification on when to suspend/terminate/re-enter business relationship	Companies are not required to suspend a contract if a supplier provides essential raw materials or services. Risks must still be addressed, but this avoids unintended economic disruption while ensuring continued progress.	No obligation to terminate relationship but member clarification on when to suspend it is required
CLIMATE TRANSITION PLANS	Obligation to adopt and put into effect a climate transition plan for climate change mitigation	No obligation to put into effect a climate transition plan (requirements in line with CSRD)	/	No transition plans	Obligation to adopt a climate transition plan but without putting it into effect
CIVIL LIABILITY	EU wide civil liability	No EU wide civil liability	/	No EU wide civil liability	No EU wide civil liability

CSRD					
TOPIC	ORIGINAL TEXT	OMNIBUS COMMISSION PROPOSAL	FESI POSITION PAPER	CURRENT JURI COMMITTEE POSITION	COUNCIL GENERAL APPROACH
SCOPE	<p>EU Companies: 250 employees and either net turnover above EUR 50 million or balance sheet total above EUR 25 million.</p> <p>Non-EU Companies: Net turnover of more than EUR 150 million in the Union for each of the last two consecutive financial years, and either have a branch in the</p>	<p>EU Companies: 1000 employees and either net turnover above EUR 50 million or balance sheet total above EUR 25 million.</p> <p>Non-EU companies: net turnover of more than EUR 450 million in the Union for each of the last two consecutive financial years, <u>and</u> <u>either</u> have a branch in the Union generating a</p>	/	1750 employees and above EUR 450 million net turnover	1000 employees and above EUR 450 million net turnover

	Union generating a net turnover of more than EUR 40 million, or have at least one subsidiary undertaking that is a large undertaking or a listed SME.	net turnover of more than EUR 50 million, <u>or</u> have at least one subsidiary undertaking that is a large undertaking.			
LIMITED ASSURANCE	<ul style="list-style-type: none"> Limited assurance until 2028 Reasonable assurance from 2028 Limited assurance standards to be developed by 2026 	<ul style="list-style-type: none"> Limited assurance kept Reasonable assurance to be scrapped Limited assurance standards to be substituted with guidelines 	<ul style="list-style-type: none"> Limited assurance kept but with phase in Limited assurance standards should be reintroduced Scrapping of reasonable assurance 	<ul style="list-style-type: none"> Limited assurance kept Limited assurance standards to be reintroduced by 1 October 2026 Scrapping of reasonable assurance maintained 	<ul style="list-style-type: none"> Limited assurance kept Limited assurance guidelines to be introduced. Limited assurance standards to be considered.

			maintained		
ESRS	<ul style="list-style-type: none"> Sector-agnostic already in place Sector-specific to be adopted by 30 June 2026 	<ul style="list-style-type: none"> Sector-agnostic to be revised Sector specific to be scrapped 	<ul style="list-style-type: none"> Sector-agnostic to be revised Sector specific to be scrapped 	<ul style="list-style-type: none"> Focus on quantitative, interoperable, no double reporting. Provide clear instructions on how to apply materiality principle 	<ul style="list-style-type: none"> ESRS to be revised every 4 years Commission to release sector-specific guidelines for ESRS

TAXONOMY					
TOPIC	ORIGINAL TEXT	OMNIBUS COMMISSION PROPOSAL	FESI POSITION PAPER	CURRENT JURI COMMITTEE POSITION	COUNCIL GENERAL APPROACH
SCOPE	Large companies subject to CSRD	Aligned with new CSRD scope (1000 employees and net turnover of more	Position on retaining materiality threshold but not	Deleted	Deleted

		<p>than EUR 450 million). Voluntary for companies below this threshold.</p> <p><u>But</u></p> <p>Undertakings with net turnover not exceeding EUR 450 million that claim taxonomy alignment must report on turnover and CapEx KPIs and may disclose OpEx KPIs</p>	<p>specifically on company size scope</p>		
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