



CSRD: are French banks standing by their previous positions?

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Introduction - reforming sustainable finance in 2020

In 2020, before proposing the legislative text that would become the Corporate Sustainability Reporting Directive (CSRD), now in effect, the European Commission launched a consultation. This process aimed to gather opinions from stakeholders (financial actors, NGOs, companies, public institutions, etc.) and take these views into account to guide the text presented to European co-legislators.

This CSRD consultation, still accessible on the European Commission's website¹, received nearly 600 responses from the European Union and beyond. Germany, Belgium, and France accounted for more than 41% of the responses received. Among these were submissions from the four largest French banks – Crédit Agricole, BNP Paribas, Banque Populaire Caisse d'Épargne (BPCE), and Société Générale – as well as from the French Banking Federation (FBF).

The NGO Reclaim Finance analyzed the responses from these five financial actors. This analysis revealed that between 2020 and 2025, French banks massively supported the new European text and the key principles, which are now being challenged. It goes on to question the relative silence of these banks, who, presumably to avoid regulatory backlash and dissociate themselves from the demands of Medef or Business Europe, largely did not take a position on the change of

¹ The link to the consultation is available here, on the European Commission's website:
https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12129-Revision-of-Non-Financial-Reporting-Directive/public-consultation_fr, (available on 02/02/2025)

direction in 2025. Worse still, the CEO of BNP Paribas² now brands the CSRD as a "bureaucratic delusion"³, in complete contradiction with the bank's previous position.

At a time when the French government is adopting a stance that challenges the very essence of European legislative texts, the arguments and positions expressed by French banks in 2020 are more relevant than ever. They highlight fundamental issues that have not disappeared and on which we simply do not have sufficient hindsight at this stage. These regulations are still being implemented and need to be completed (for example, with sectoral ESRS standards).

The silence of the banking sector or its alignment with the demands of large corporations represents a dangerous opportunistic surrender. Financial actors can and must take a stand against the dismantling of these texts and should stand up in favor of maintaining the ambition they claim to support.

On Methodology

While the responses to the consultation are public, some are sometimes anonymous. Responding organizations must choose between two options: "The feedback can be published with your personal information" or "The feedback can be published in an anonymous way."

BNP Paribas, Société Générale, and the French Banking Federation (FBF) agreed to make their responses publicly available. In contrast, Crédit Agricole and the BPCE group chose to keep their responses anonymous. Reclaim Finance's analysis to determine their responses was based on information contained in the anonymous responses that would seem to identify the banks as the authors.

For example, line 109 of the consultation, Crédit Agricole wrote, "At Credit Agricole for instance, we follow a risk-based approach [...]" or "Credit Agricole considers that [...]" The BPCE group revealed its identity line 32 ("The Groupe BPCE is both a contributor and a user [...]") and also line 111 ("The Groupe BPCE has explained [...] From our experience, we found out that [...]"), as well as line 121, where the group provided the annual costs of non-financial reporting for BPCE and its subsidiary Natixis.

The information concerning Crédit Agricole and BPCE is not officially from the two banking groups. However, it is difficult to imagine that another actor could respond anonymously and provide precise information, such as the amount spent on non-financial reporting each year. The limited doubts about the identity of the authors of these responses allow Reclaim Finance to assume that these responses are from the two French financial actors.

² Challenges, [La directive CSRD, "délire bureaucratique" pour le directeur général de BNP Paribas](#), 25 November 2024

³ For more information on the myths surrounding bureaucracy, see: [EU regulatory requirements: debunking misconceptions](#), 20 January 2025

The need for new non-financial reporting regulations

In 2020, major economic and financial actors were already subject to the Non-Financial Reporting Directive (NFRD), a European directive in place since 2014. This directive required relevant actors to publish certain elements related to non-financial performance, including environmental and social issues. Negotiated as early as 2013, the directive demanded information that became outdated over time. The Paris Climate Agreement of 2015 and European goals aiming to achieve carbon neutrality by 2050 significantly changed the landscape. It was therefore necessary to revise the NFRD to align it with current challenges.

Financial actors expressed this view in their responses to the consultation. For example, Crédit Agricole indicated that the Sustainable Finance Action Plan (SFAP) and the European Green Deal are major upheavals that "call for a renewal of non-financial reporting."⁴ BNP Paribas shared this position, recalling that the framework set by the NFRD is insufficient and that a new non-financial framework must be established by the European Commission.⁵

Financial actors were in complete agreement regarding the shortcomings of the NFRD, including the lack of comparability (Table 1), insufficient information (Table 3), and unreliability (Table 2) for making decisions based on non-financial criteria.

On this point, the five financial actors studied here are unanimous: the previous directive did not go far enough in non-financial reporting.

Table 1 - On the comparability of NFRD information

| Consultation | <i>"The lack of comparability of non-financial information reported by companies pursuant to the NFRD is a significant problem."</i> ⁶ (Question n°1) |
|-------------------------|--|
| Crédit Agricole | 5 (totally agree) |
| BNP Paribas | 5 (totally agree) |
| Société Générale | 5 (totally agree) |
| BPCE | 5 (totally agree) |
| FBF | 5 (totally agree) |

Table 2 - On the reliability of NFRD information

⁴ Crédit Agricole, "Such game changer calls for a fresh start in non-financial reporting.", explanation of the answers given for questions 8 to 20 of the consultation.

⁵ BNP Paribas, « The current frameworks are not sufficient on a stand alone basis, that's why an European framework should be designed by the European Commission. », explanation of the answers given for questions 8 to 20 of the consultation.

⁶ Question No. 1 of the consultation (lines 19, 20 and 21 in the appendix).

Closed-ended questions ask respondents to provide an opinion on a scale of 1 (strongly disagree) to 5 (strongly agree).

| Consultation | <i>"The limited reliability of non-financial information reported by companies pursuant to the NFRD is a significant problem." (Question 1)</i> |
|------------------|---|
| Crédit Agricole | 5 (totally agree) |
| BNP Paribas | 5 (totally agree) |
| Société Générale | 5 (totally agree) |
| BPCE | 5 (totally agree) |
| FBF | 5 (totally agree) |

| Table 3 - On the sufficiency of data | |
|--------------------------------------|--|
| Consultation | <i>"Companies reporting pursuant to the NFRD do not disclose all relevant non-financial information needed by different user groups." (Question 1)</i> |
| Crédit Agricole | 5 (totally agree) |
| BNP Paribas | 5 (totally agree) |
| Société Générale | 5 (totally agree) |
| BPCE | 5 (totally agree) |
| FBF | 5 (totally agree) |

Changing the regulation to improve comparability

Standardized reporting obligations widely supported

It is clear that the NFRD is insufficient and, as it stands, fails to provide sufficient data to compare the companies subject to it, leading to numerous problems. Société Générale highlights the cost of the lack of harmonization in non-financial reporting criteria.⁷

However, should companies be required to publish this non-financial information? This is precisely one of the questions posed by the European Commission in its consultation. **Again, the five financial actors studied here are unanimous: the requirement of a common standard would largely resolve the identified problems (Table 4).**⁸

Financial actors go further and demand **specific non-financial reporting standards for certain sectors, such as fossil fuels, for example (Table 5).**

⁷ Société Générale, "With regard to cost, lack of standardisation of the non-financial information leads to have to respond to various stakeholders demands (investors, ESG rating agencies, etc), resulting in additional cost (in terms of personal days) to respond to those solicitations (sic)", explanation of the answers given for questions 8 to 20 of the consultation.

⁸ Respondents were given a choice of 5 answers: "Don't know"; "Not at all"; "To some extent, but not much"; "To a reasonable extent"; "To a very great extent".

Table 4 - On the obligation of a common reporting standard

| Consultation | <i>"In your opinion, to what extent would a requirement on companies to apply a common standard for non-financial information resolve the problems identified?." (Question 8)</i> |
|-------------------------|---|
| Crédit Agricole | To a very great extent |
| BNP Paribas | To a very great extent |
| Société Générale | To a very great extent |
| BPCE | To a very great extent |
| FBF | To a very great extent |

Table 5 - On creating sector-specific standards

| Consultation | <i>"In your opinion, is it necessary that a standard applied by a company under the scope of the Non-Financial Reporting Directive should include sector-specific elements?" (Question 9)</i> |
|-------------------------|---|
| Crédit Agricole | Yes |
| BNP Paribas | Yes |
| Société Générale | Yes |
| BPCE | Yes |
| FBF | Yes |

European-made reporting standards

Financial actors called for the establishment of common non-financial standards to ensure the comparability of companies, better understand their environmental impact and the risks they face, and ultimately direct financing towards the most virtuous actors. The question now arises as to which authority should establish these standards. International institutions are working on these issues, such as the Sustainability Accounting Standards Board (SASB) in the United States.⁹ Could this standardization body, known for being less ambitious on climate issues, be the solution? The financial actors studied here are once again unanimous and refuse to see the SASB as a credible option for establishing new non-financial reporting standards in Europe (Table 6).

On the other hand, financial actors view the involvement of the Task Force on Climate-related Financial Disclosures (TCFD), created in December 2015 during COP21 by the G20 Financial

⁹ SASB was absorbed by the International Sustainability Standards Board (ISSB) in 2022.

Stability Board, favorably (Table 7). Unanimity is once again achieved on the highest note and around the climate issue, proving the importance of this topic.

The responses from the analyzed financial actors also overwhelmingly support the Platform on Sustainable Finance (PSF), a body of experts on responsible finance, tasked with providing specialized advice to the European Commission, and demand that it play a central role in establishing non-financial criteria.

Beyond the clear rejection of American standards and the desire for convergence with the TCFD's sustainability rules, financial actors believe that other actors are relevant, such as civil society representatives and NGOs, and academics. The responses are generally in favor of their very significant involvement (for the FBF and BNP Paribas) or their reasonable involvement for the other three financial actors (Table 9). The responses are exactly the same regarding academics and researchers (Table 10).

Finally, the consultation asks respondents to propose other organizations that could participate in creating this common reporting standard. **Four of the five analyzed financial actors propose the EFRAG (European Financial Reporting Advisory Group).** The BPCE group is the exception, proposing organizations "representing the European non-financial industry" (Table 11). EFRAG was indeed tasked by the Commission with developing the technical standards known as ESRS and carried out the work on which the Commission relied for the finally adopted standards.

Table 6 - On the role that ISSB/SASB should play

| Consultation | <i>"If there were to be a common European non-financial reporting standard applied by companies under the scope of the NFRD, to what extent do you think it would be important that such a standard should incorporate the principles and content of the following existing standards and frameworks?: Sustainability Accounting Standards Board." (Question 11)</i> |
|------------------|--|
| Crédit Agricole | 1 (not at all) |
| BNP Paribas | 1 (not at all) |
| Société Générale | 2 (to some extent but not much) |
| BPCE | 1 (not at all) |
| FBF | 1 (not at all) |

Table 7 - On the role that the TCFD should play

| Consultation | <i>"If there were to be a common European non-financial reporting standard applied by companies under the scope of the NFRD, to what extent do you think it would be important that such a standard should incorporate the principles and content of the following existing standards and frameworks?: Task Force on Climate-related Financial Disclosures (TCFD)." (Question 11)</i> |
|--------------|---|
|--------------|---|

| | |
|-------------------------|----------------------------|
| Crédit Agricole | 4 (to a very great extent) |
| BNP Paribas | 4 (to a very great extent) |
| Société Générale | 4 (to a very great extent) |
| BPCE | 4 (to a very great extent) |
| FBF | 4 (to a very great extent) |

Table 8 - On the role that the Platform on Sustainable Finance should play

| Consultation | <i>"To what extent should the following European public bodies or authorities be involved in the process of developing a European non-financial reporting standard?: Platform on Sustainable Finance" (Question 19)</i> |
|-------------------------|---|
| Crédit Agricole | 4 (to a very great extent) |
| BNP Paribas | 4 (to a very great extent) |
| Société Générale | 4 (to a very great extent) |
| BPCE | 4 (to a very great extent) |
| FBF | 4 (to a very great extent) |

Table 9 - On the role that civil society should play

| Consultation | <i>"In addition to the stakeholders referred to in the previous question, to what extent to do you consider that the following stakeholders should be involved in the process of developing a European non-financial reporting standard?: <u>Civil society representatives/NGOs.</u>" (Question 18)</i> |
|-------------------------|---|
| Crédit Agricole | 3 (to every reasonable extent) |
| BNP Paribas | 4 (to a very great extent) |
| Société Générale | 3 (to every reasonable extent) |
| BPCE | 3 (to every reasonable extent) |
| FBF | 4 (to a very great extent) |

Table 10 - On the role that academia should play

| Consultation | <i>"In addition to the stakeholders referred to in the previous question, to what extent to do you consider that the following stakeholders should be involved in the process of developing a European non-financial reporting standard?: <u>Academics</u>" (Question 18)</i> |
|------------------------|---|
| Crédit Agricole | 3 (to every reasonable extent) |

| | |
|-------------------------|--------------------------------|
| BNP Paribas | 4 (to a very great extent) |
| Société Générale | 3 (to every reasonable extent) |
| BPCE | 3 (to every reasonable extent) |
| FBF | 4 (to a very great extent) |

Table 11 - On the participation of other organizations in creating the standard

| Consultation | <i>"Please specify which other European public body/ies or authority/ies you consider should be involved in the process of developing a European non-financial reporting standard and to what extent: Other European public body or authority #1: Name of other European public body or authority." (Question 19.2)</i> |
|-------------------------|---|
| Crédit Agricole | EFRAG |
| BNP Paribas | EFRAG |
| Société Générale | EFRAG |
| BPCE | Authorities/organisations representing the European non-financial industry |
| FBF | EFRAG |

Change the regulation to integrate new fields

Banks demand climate transition plans

The four major French banks and the French Banking Federation are seen to have wanted the CSRD directive to be updated to include new elements. Question 3 of the consultation asked stakeholders whether additional reporting categories should be added to enhance corporate transparency, and if so, which ones.

Financial actors unanimously requested more information on climate issues. Specifically:

- **Crédit Agricole asked for information on "environmental and social policies and strategies, their transition policy" as well as "how they implement these strategies." Crédit Agricole clearly requested a climate transition plan, a dimension now introduced by the CSRD.**
- **BNP Paribas also requested information on transition policies and strategies, as well as their implementation.**
- **Société Générale and the BPCE group requested transition plans aligned with a 2°C scenario and/or with European objectives.**

Finally, the FBF demanded greater visibility into decision-making by executive boards (which issues were considered, which scenarios, what importance was given to ESG criteria in strategic decisions, etc.).

Table 12 - On the Demand for Transition Plans

| Consultation | <i>"Are there additional categories of non-financial information [...] that companies should disclose in order to enable users of their reports to understand the development, performance, position and impacts of the company?" (Question n°1)</i> |
|------------------|---|
| Crédit Agricole | <p>Companies' KPIs must be aligned with :</p> <ul style="list-style-type: none"> • The list of Taxonomy-compliant activities and products they produce. Companies could follow the reference to metrics in the taxonomy and indicate where they stand compared to the threshold. • The environmental characteristics of the respective activities and products (including process and product certifications, environmental product claims or declarations – EPD - and life cycle analysis declarations - LCA) or the products' environmental applications, and • Gradually, companies should be requested to report the associated revenues and expenses of eligible products or activities (as a percentage of the total) and the associated sustainable assets (as a percentage of the total)." <p>Scenario analysis following the TCFD recommendation would be very useful for large companies in sectors accounting for substantial carbon emissions. It would be useful to standardize the scenario analysis by e.g. recommending at least one 1,5 or 2 degree scenario and one business as usual scenario.</p> <p>Companies' transition policies and strategies: companies should disclose their environmental & social strategies, their transition policy and their governance as well as how they implement these strategies (action plans and KPIs).</p> |
| BNP Paribas | <p>Entities transition policies and strategies: more information on entities overall carbon transition strategies, their governance and on how they implement these strategies.</p> <p>Alignment with 2°C scenario: more forward looking information in terms of companies' strategy with quantitative objectives. What really matters for stakeholders is not so much the current compliance with the taxonomy but the strategy of the company to adapt to 2 degrees scenario. EU banks are fully committed to accelerate the transition, as shown in the recent signature of the Principles for Responsible Banking, and of the Collective Commitment to Climate Action (CCCA) initiative, under UNEP-FI umbrella, endorsed on 18 September 2019 by 32 Signatory Banks of the Principles for Responsible Banking. These banks have committed to align their portfolios to reflect and finance the low-carbon, climate-resilient economy required to limit global warming to well-below 2, striving for 1.5 degrees Celsius.</p> |
| Société Générale | <p>Transition strategies and alignment with 2°C scenario and European Green Deal targets (and potential other European Union Commitments):</p> <p>Société Générale, with other EU banks already have made strong commitments to speed up the redirection of capital flows, by agreeing to the Principles for Responsible Banking and by progressively realigning their portfolio with the Paris agreement.</p> |

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|-------------|--|
| | <p>The management of bank portfolio alignment with Paris agreement will require to have:</p> <ul style="list-style-type: none"> - information on entities' overall carbon transition strategies, their governance and on how they implement these strategies would be helpful for banks to manage their portfolio alignment with - Forward looking information in terms of companies's strategy with quantitative objectives. <p>For now, a lot of information on the governance are available (i.e. on large corporate) , but it should be more standardized in order to be usable.</p> |
| BPCE | <p>On scenario and targets: an additional information that would need to be included in a European standard is the alignment of the company on a 2-degree pathway. However, we highlight the need for a common methodology to be determined at the EU-level or international level before such a provision is required, in order to avoid greenwashing and allow for comparability on the market.</p> |
| FBF | <p>There is a need to have information with regard to how the top management considers the ESG issues. It's essential to have information on how often sustainability issues are discussed at the board level, what kind of sustainability issues have been discussed, and if some targets have been set, monitored (achievement status etc.) and if scenarios and their impacts have been considered when setting these targets.</p> |

The issue of double materiality

The consultation launched by the European Commission also allowed stakeholders to express their views on the concept of "double materiality," i.e. that an economic or financial actor must consider both the impacts of external factors on the company's performance and the impacts of the company on its environment (e.g., the impact on ecosystems, climate, populations living near implemented projects, etc.). The banking sector actors studied here all requested more information on the processes for evaluating double materiality implemented by companies, saying that the concept of double materiality is essential for correctly analyzing the non-financial performance of companies.¹⁰ All the financial actors analyzed demand the mandatory publication of the materiality assessment process implemented by the actors concerned by the directive (Table 13 and Table 14 for explanations).

| Table 13 - On the Mandatory Publication of the Materiality Assessment Process | |
|---|--|
| Consultation | <i>"Should companies reporting under the NFRD be required to disclose their materiality assessment process?" (Question 24)</i> |
| Crédit Agricole | Yes |
| BNP Paribas | Yes |
| Société Générale | Yes |

¹⁰ BPCE, "double materiality principle that is essential to have a correct ESG analysis of companies", answer to question 23.

| | |
|-------------|-----|
| BPCE | Yes |
| FBF | Yes |

Table 14 - Development of Responses on Double Materiality

| Consultation | <i>“Please provide any comments or explanations to justify your answers to questions 21 to 24.”</i> |
|-------------------------|---|
| Crédit Agricole | Disclosing the materiality assessment process is necessary to assess the work of the company and compare different companies. Such transparency is the condition to keeping the materiality assessment a company-specific process, based on its business, activities and location. |
| BNP Paribas | For environmental and social materiality, another definition should be used, taking into account the broader range of information users (stakeholders) and a longer time horizon. One possibility would be to use a predetermined list of material topics to be disclosed depending on the sector. For example, disclosures related to air quality may be material to the extractive industry but not the high technology industry. Such matrix could be designed by the EU itself. This would permit to have a consistent level of information for similar industries/actors, and improve comparability. |
| Société Générale | The double materiality principle should not be used to avoid the disclosure of some indicators as per the “comply or explain” procedure. |
| BPCE | The Groupe BPCE has explained in its NFR the materiality assessment process. From our experience, we found out that this exercise gives the opportunity to start a conversation internally among the different business lines, which is positive. |
| FBF | However, the double materiality principle should not be used to avoid the disclosure of some indicators as per the “comply or explain” procedure. |

How should the Directive apply?

The revision of the Non-Financial Reporting Directive (NFRD) led to a re-examination of the scope of the directive. Part of the consultation focused on the question of which actors are concerned by this directive. These questions sought opinions expressed by economic or financial entities on the issue of extraterritoriality of standards (*i.e.* whether the standards should apply for non European entities) and the consideration of SMEs.

Support for extraterritoriality of regulations

Regarding the extraterritoriality of the CSRD – meaning its application to non-European companies but those with significant market shares on European soil – it is important to return to one of the major motivations of the text which is providing non-financial information to investors to guide investments towards transition efforts. The CSRD must therefore financially benefit

economic actors who conduct non-financial reporting. It is supposed to become an asset for European companies and those operating in Europe.

The consultation allowed for resolving this question of extraterritoriality of standards and showed that the directive related to non-financial reporting must apply to all companies with operations on the continent, and not just to companies domiciled in one of the EU countries. **All the financial actors studied here completely agree with the need to include non-European companies operating on the European market (Table 15).** Financial actors indeed recall the central notion of comparability, which allows for establishing a common framework and would be incomplete without foreign companies with significant operations on European soil. Additionally, the French Banking Federation specifies that the directive on non-financial reporting must apply to the entirety of non-European entities' operations and not be restricted to activities carried out only in EU markets.

Table 15 - On the Extraterritoriality of the CSRD

| Consultation | <i>"If the scope of the NFRD were to be broadened to non-PIEs [non public Interest Entities], to what extent would you agree with the following approaches?: Expand the scope to include large companies established in the EU but listed outside the EU." (Question 41)</i> |
|------------------|--|
| Crédit Agricole | 5 (totally agree) |
| BNP Paribas | 5 (totally agree) |
| Société Générale | 5 (totally agree) |
| BPCE | 5 (totally agree) |
| FBF | 5 (totally agree) |

Table 16 - Development of Responses on the Extraterritoriality of the CSRD

| Consultation | <i>"If the scope of the NFRD were to be broadened to non-PIEs [non public Interest Entities], to what extent would you agree with the following approaches?: Expand the scope to include large companies established in the EU but listed outside the EU."</i> |
|------------------|--|
| Crédit Agricole | [...] Similarly, extending the scope to cover non-EU companies and EU companies listed outside the EU would help broadening the application of sustainable finance tools and level the playing field for companies based in the EU. [...] |
| BNP Paribas | N/A |
| Société Générale | |
| BPCE | The scope of the NFRD should be extended to all companies having an activity with EU customers: the rationale behind that is that non-financial data is currently lacking while stakeholders, and financial institutions in |

| | |
|-----|--|
| | particular, are increasingly under pressure of more disclosure/reporting requirement (may it be at the entity-level or at product-level). [...] |
| FBF | [...] extending the scope to cover non-EU companies and EU companies listed outside the EU would help broadening the application of sustainable finance tools and guarantee level playing field. Disclosures should respond to the entire company not only their EU operations |

Application to SMEs under conditions

Since 2020, particular attention has been paid to the potential burden that could fall on the category of small and medium enterprises. The consideration of SMEs in the final text of the CSRD – through simplified standards and an obligation only for listed SMEs – can be partly explained by the responses received during the consultation. **The financial actors analyzed here positioned themselves in favor of a simplified standard for these categories of economic actors. However, it is very clear to them that this simplified standard should not be merely voluntary but rather mandatory (Table 17).**

The responses from the financial actors analyzed here therefore call for simplified standards that would limit the administrative burden and they propose certain paths for improvement. **Others recall that these reporting standards will be beneficial for their clients**, as explained by Crédit Agricole: "Our SME clients understand that they will need to provide information on their environmental commitments [...] and that there is a business opportunity to do so."

Finally, the consultation raises the question of the threshold from which a company should publish its non-financial reporting and proposes expanding it from companies with a minimum of 500 employees under the NFRD to those with a minimum of 250 employees. **The actors analyzed here are almost all in perfect agreement with this proposal (BNP Paribas abstained from this question, see Table 19). According to them, lowering the thresholds to 250 employees would facilitate access to financing for ecological transition for new actors who will organize their reporting according to simplified CSRD standards.**¹¹

The threshold finally adopted in the CSRD text is at least 250 employees, but is strictly conditional. The CSRD only applies to entities with more than 250 employees that have at least €25 million on the balance sheet and/or €50 million in annual turnover. Furthermore, the implementation of the directive was progressive, according to several size tiers. This position allows for SMEs to be excluded from the scope of the directive (except for listed SMEs), leaving them the option of using a voluntary simplified reporting mechanism.

| Table 17 - On the Mandatory Nature for SMEs | |
|---|--|
| Consultation | <i>"If the EU were to develop a simplified standard for SMEs, do you think that the use of such a simplified standard by SMEs should be mandatory or voluntary?" (Question 16)</i> |

¹¹ For more information on the myths surrounding bureaucracy, see: [EU regulatory requirements: debunking misconceptions](#), 20 January 2025

| | |
|-------------------------|-----------|
| Crédit Agricole | Mandatory |
| BNP Paribas | Mandatory |
| Société Générale | Mandatory |
| BPCE | Mandatory |
| FBF | Mandatory |

Table 18 - Development of Responses on SMEs

| Consultation | <i>"Please provide any comments or explanations to justify your answers to questions 8 to 20:"</i> |
|-------------------------|---|
| Crédit Agricole | We support the development of a simplified minimum reporting framework for SMEs, giving due considerations to proportionality and materiality. Our SME clients understand that they will need to provide information on their environmental commitments to banks and investors (and other business partners) and there is a business opportunity to do so. It is more an issue of how to organize that reporting. We think that a simplified and compulsory reporting would help SMEs structure their reporting. We note finally that in France an increasing number of SMEs request the ECOVADIS CSR rating. That might be interesting for the Commission to look at. |
| BNP Paribas | All our answers refer to SMEs that may be included in the scope of NFRD. If the revised scope of NFRD include SMEs with the characteristics above the thresholds as defined by the Accounting Directive (cf Chapter 7), the principle of proportionality should apply to them, to a reasonable extent and through a mandatory simplified standard. |
| Société Générale | Regarding SMEs topic, this is a complex question as sustainable finance framework will incentivise financial sector in some extent to finance/invest into entities which publish/provide data on transition. Therefore, SME will be likely asked to provide information from various banking or financial stakeholders. In this respect, a mandatory set of standardised and limited data could help in some extent to afford the reporting cost. [...] |
| BPCE | |
| FBF | All our answers refer to SMEs that are currently/may be in case of extension of the scope included under the scope of NFRD. The principle of proportionality should apply to limit the burden on SMEs to a reasonable extent. It should be limited to the most material issues and adverse impacts (e.g. human rights and climate change). It would be relevant to have a mandatory simplified standard for SME which enter the scope of NFRD. If the scope of the NFRD were to be extended to smaller undertakings, we think that an incentive and support program should be implemented to help SMEs cope with those requirements and thus help them embark on the transition. |

Table 19 - On Lowering the Threshold to 250 Employees

Consultation *"If the scope of the NFRD were to be broadened to other categories of PIEs, to what extent would you agree with the following approaches?: Expand scope to include all large public interest entities (aligning the size criteria with the definition of large undertakings set out in the Accounting Directive: 250 instead of 500 employee threshold)." (Question 40)*

Crédit Agricole 5 (totally agree)

BNP Paribas

Société Générale 5 (totally agree)

BPCE 5 (totally agree)

FBF 5 (totally agree)

Tableau 20 - Developments on the issue of thresholds

Consultation *"Please provide any comments or explanations to justify your answers to questions 40 to 43:"*

Crédit Agricole [...] Broadening the scope of the NFRD to other categories of PIEs would be very relevant to enhance access to information and broaden the investment universe, thus improving their access to capital. For listed companies, it would also align the NFRD with the scope of the taxonomy, which applies to all financial investments in the capital markets. Information on climate risk from all PIEs is needed for TCFD reporting as integrated into the EU Non-financial reporting guidelines, and for the future EU reporting standard. An alignment with the Accounting Directive would be useful in the perspective of rationalization of reporting. [...]

BNP Paribas N/A

Société Générale

BPCE [...] It is hence important that the regulatory scope of non-financial reporting is as extended as possible, while proportionality needs to be included for smaller companies in order to avoid unnecessary burden (a lightened reporting for SMEs for example should be determined). However, we think that the conditions for financial and non-financial corporates should be the same and that no distinction should be made. [...]

FBF Broadening the scope of the NFRD to other categories of PIEs would be very relevant to enhance access to information and broaden the investment universe, thus improving their access to capital. For listed companies, it would also align the NFRD with the scope of the taxonomy, which applies to all financial investments in the capital markets. Information on climate risk from PIEs regardless of their size is essential for TCFD reporting as integrated into the EU Non-financial reporting guidelines and for the future EU reporting standard. An alignment with the Accounting Directive would be useful in the perspective of rationalization of reporting.

In the face of climate challenges and the need for rapid ecological transition, it is crucial that French banks maintain a consistent position with the commitments they have made in the past. The unanimous support given to the CSRD in 2020 demonstrates a willingness to improve the transparency and comparability of non-financial information. It is therefore imperative that these financial actors remain faithful to these principles and actively support the implementation of ambitious regulations, rather than revising the core of these texts.

Contact

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