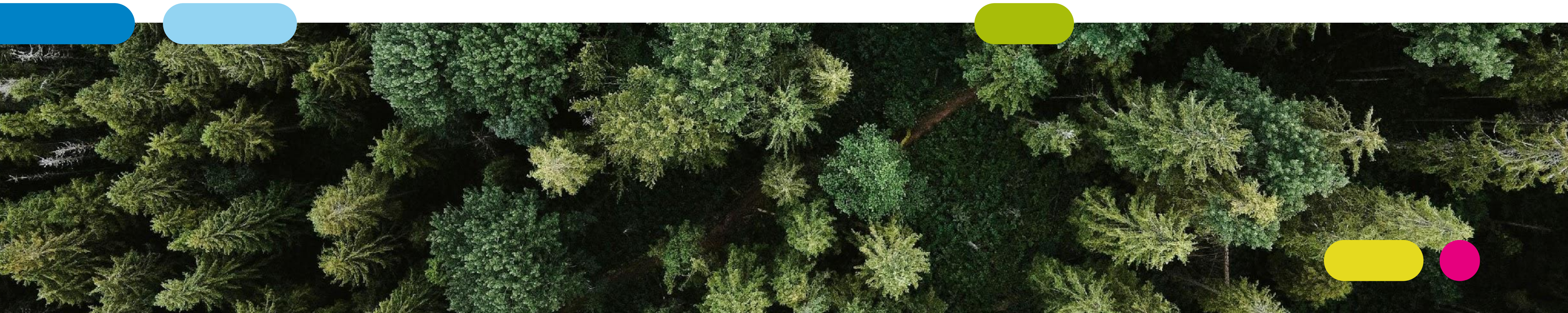


# *Could CSRD bring sustainability into the Board Room*



A research project by EASP in France, Germany, Italy, Spain, and UK





# *Sustainability in European Companies* **Barometer : new food for thought and action**



The European Association for Sustainability Professionals regroups almost 4,000 CSR / ESG / Sustainability Directors who felt the need, few years ago, to come together and share common challenges and solutions.

The EASP is the parent association of local initiatives in several countries such as la Dirse in Spain, VNU in Germany, Sustainability Makers in Italy, ICRS in the UK, C3D in France, HEASP in Greece, Responsible Business Forum in Serbia, CSR Turkey and growing with Romania's Asociatia Profesionistilor in Sustenabilitate just joining in October 2024 and more recent applications.

Approximately one year ago, we gathered to explore shared questions central to our mission, such as: where is sustainability positioned in companies? Had certain countries managed to put it at the heart of strategic decision-making? Is Corporate Sustainability Reporting Directive (CSRD) a positive 'game changer' beyond the 'data point anxiety'?

While CSRD is far from being just a compliance exercise, many companies have approached it from the angle of reporting. The legislation, however, is designed to push them towards more comprehensive impact analyses, ultimately ensuring the sustainability of both their ecosystems and business operations. Rather than the spirit of the law, they have retained the letter.

The essential question remains: will CSRD's double materiality requirement reveal previously overlooked strategic issues and thus elevate sustainability to a boardroom priority?

To address this, EASP initiated a European study, not to provide an exhaustive overview, but rather to stimulate dialogue across the continent. This first study included insights from five countries—Germany, France, Spain, Italy, and the UK. On October 22, 2024, we hosted an online roundtable attended by around 430 participants from 20 countries.

The event featured a keynote speech by Pascal Durand, the European Parliament's CSRD rapporteur, followed by a roundtable discussion of our study results with representatives from five EASP networks. Discover the full results of the study on the following pages.

We wish you an enlightening read!

Camille Szejnhorn  
ESG Impact Director of  
the Lefebvre Sarrut Group  
Member of C3D  
EASP General Secretariat





# Acknowledgements

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**Camille Szejnhorn**, ESG Impact Director of the Lefebvre Sarrut Group

The study was conducted and analysed by **Catherine Brennan** from Birdeo.

Contributors to the conference and this deliverable:

**Pascal Durand**, CSRD Rapporteur at the European Parliament  
**Birgit Gieren**, for German VNU (Verband für Nachhaltigkeits- und Umweltmanagement e.V.)  
**Carlos Arango Arconada**, Director General of the Spanish DIRSE (Asociación Española de Directivos de Sostenibilidad)  
**Maria-Cristina Zaccone**, Researcher, Professor and Member of Italian Sustainability Makers  
**Paul Burke**, Director at SLR Consulting and Fellow of the British ICRS (Institute of Corporate Responsibility & Sustainability)  
**Sébastien Mandron**, Chief Sustainability Officer at Worldline Global and Member of French C3D (Collège des Directeurs du Développement Durable)

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Other contributors to the survey:

From Italian Sustainability Makers: Margherita Macellari, Stefania Bertolini Daniele Esposito, Matteo Pedrini  
From Spanish Dirse: Miwi Clavera Maestre  
From German VNU: Bettina Heimer





# *Keynote by Pascal Durand,* *CSRD Rapporteur, former* **Member of European Parliament**

Only time will tell what role CSRD will play in ensuring that boards of directors actually take sustainability into account. What I am certain of is that, without the CSRD, we would be missing a tool, an element in the company's scorecard that would enable the objectives and constraints linked to sustainability issues to be debated objectively and seriously. The legislator's question was not whether the issue of sustainability should be included in a company's governance criteria - we considered it to be an objective necessity in the physical and economic reality of the 21st century - but how to make sustainability analysis as rigorous and serious as financial analysis. In executive committees, no one questions the veracity of the financial statements, we debate their consequences, investment choices or others, EBITDA, etc., but the financial dashboard serves as a tangible support for decisions.

In the case of sustainability, this reference to objective, shared, clear and recognised criteria, for example by an entire sector, was contested, as was the relevance of the criteria used, sometimes leaving aside the reflection on the sustainability trajectories to be implemented in concrete terms. This was one of the major problems of the NFRD: the rigour, legibility and comparability of sustainability criteria and information. And this uncertainty, even arbitrariness, was a source of scepticism, criticism and insecurity for analysts and investors.





The thrust of our legislation was to ensure the sincerity and relevance of sustainable development information. We wanted to give all the company's stakeholders, especially those working on the inside, reliable information that would enable them to be genuinely taken into account. We wanted to move beyond discussions about the appropriateness or relevance of criteria, and concentrate on the analysis of objective, public data, so as to be able to set objectives and make operational choices to achieve them.

The mandatory nature of reporting, the rigour and exhaustiveness of the ESRS standards, and the audit and certification of the report are all elements that should enable boards of directors to consider the issue of sustainability as a serious, even unavoidable, subject to be integrated into each of their decision-making processes.

But will it be enough? The answer is more nuanced, since it depends above all on those who will have these new ESRS tools at their disposal.

- Will they be used for cosmetic purposes or will they pave the way for genuine transition plans to transform business practices?
- Will compliance with sustainability objectives be demanded by investors and financial backers in the same way as those linked to financial profitability?
- Will EU Member States implement this directive seriously, so as to protect virtuous companies from unfair competition within a single internal market?

These were the ultimate objectives of our text, but these questions, and others that will emerge over the years, remain, because the future is never written and belongs only to those who can bring it to life: boards of directors, stakeholders, auditors and EU governments. It's a source of uncertainty, but also of hope.





As the CSRD drives new strategic discussions, we can anticipate that the company's organisational structure will evolve to facilitate more frequent and effective interactions between the Board of Directors and the CSR officer.



*Sébastien Mandron*

We recognise that internal committees are evolving from focusing on single topics to forming sustainability teams closely connected to executive committees. This development indicates a shift toward adopting a more holistic strategy.



*Birgit Gieren*

The trends emerging from the data illustrate not only how Italian companies are adapting to the requirements of the CSRD but also how these changes are fundamentally reshaping the role of sustainability managers. As Italian companies adopt new tools and systems to improve the collection and analysis of sustainability data, sustainability managers are now expected to go beyond regulatory compliance.



*Maria-Cristina Zaccone*

In some ways, we could say that Spain had already experienced what we and other countries are now facing with the CSRD. As a result, certain organisational adjustments had to be made to comply with the directive's requirements and the evolving role of Sustainability within our companies



*Carlos Arango Arconada*

One significant development has been the extent to which ESG has attracted far more attention from corporate functions that have not previously been heavily involved. Previously of large companies (FTSE 100 and similar) located sustainability/ESG in Corporate/Public Affairs. Increasingly, Marketing and Finance are taking on the responsibility. CFOs in particular are becoming keener to "own" ESG strategy and reporting – especially in relation to climate change.



*Paul Burke*

Today, in a context where companies' overall performance incorporates both financial and non-financial criteria, we are seeing a change in the roles of Chief Sustainability Officers, with a broader scope and functions that are increasingly integrated into the Executive Committee. The barometer also highlights the fact that CSR teams are evolving in size and structure, and that their remit includes environmental expertise, communication and reporting. The challenge today is to demonstrate the value of extended CSR governance.



*Catherine Brennan*







# *Key* Findings





# Key Findings

## Disparities in the maturity of European companies with regard to CSRD

The survey of more than 400 European CSR/ESG directors raises a number of issues concerning the relationship between companies and CSRD.

The first finding is that **almost half of the organisations surveyed have already modified their CSR organisation to better respond to the CSRD**. This means, conversely, that the other half of the companies surveyed have not yet taken the plunge. On the other hand, half of those organisations that are lagging behind consider that change is necessary, confirming a gradual awareness which, although in the majority, illustrates how far we still have to go.

## A substantial new allocation of resources deemed essential, although still insufficient given the scale of the challenges involved.

The barometer also highlights that **the majority of changes are budgetary or organisational**: the resources allocated to sustainability within the company are evolving.

One of the most significant adaptations observed concerns the financial resources dedicated to sustainability. In response to the CSRD, 85% of CSR departments have already increased budgets or are planning to do so. However, despite these efforts, 55% of CSR directors believe that the resources available are still insufficient to meet sustainability requirements. This gap reveals a need for more substantial funding to ensure successful and sustainable compliance over the long term.

Moreover, in 50% of cases, these additional resources are devoted to outsourcing, in particular through the use of specialist consultancy firms. These investments make it possible to obtain specific support in navigating the complexities of the regulatory environment, but they also underline the increasing dependence of companies on external advice due to a lack of in-house resources or expertise.

## Structural reorganisation underlines growing awareness

Alongside financial investment, the study reveals structural changes within companies. 39% of companies have already changed, or plan to change, the hierarchical attachment of the CSR function in response to the CSRD. Similarly, the survey highlights that over 80% of companies surveyed report increased collaboration between CSR and finance. This development can be explained by the increased complexity of collecting and processing the data needed to meet CSRD requirements.

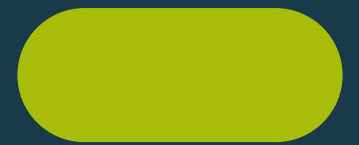
At the same time, half of these companies have already integrated sustainability issues at executive committee (Comex) level, marking a paradigm shift: sustainability is no longer a mere operational or compliance consideration, it is becoming a strategic priority in its own right.

## A dynamic that now also concerns SMEs

Contrary to preconceived ideas, **the changes observed are not limited to large companies**. In fact, among the respondents to the barometer, Spain and Italy stand out for an economic fabric that is predominantly made up of small businesses: 50% of Italian and Spanish respondents are companies with fewer than 250 employees. These companies have also started to integrate sustainability into their operations.







# *Detailed* Results





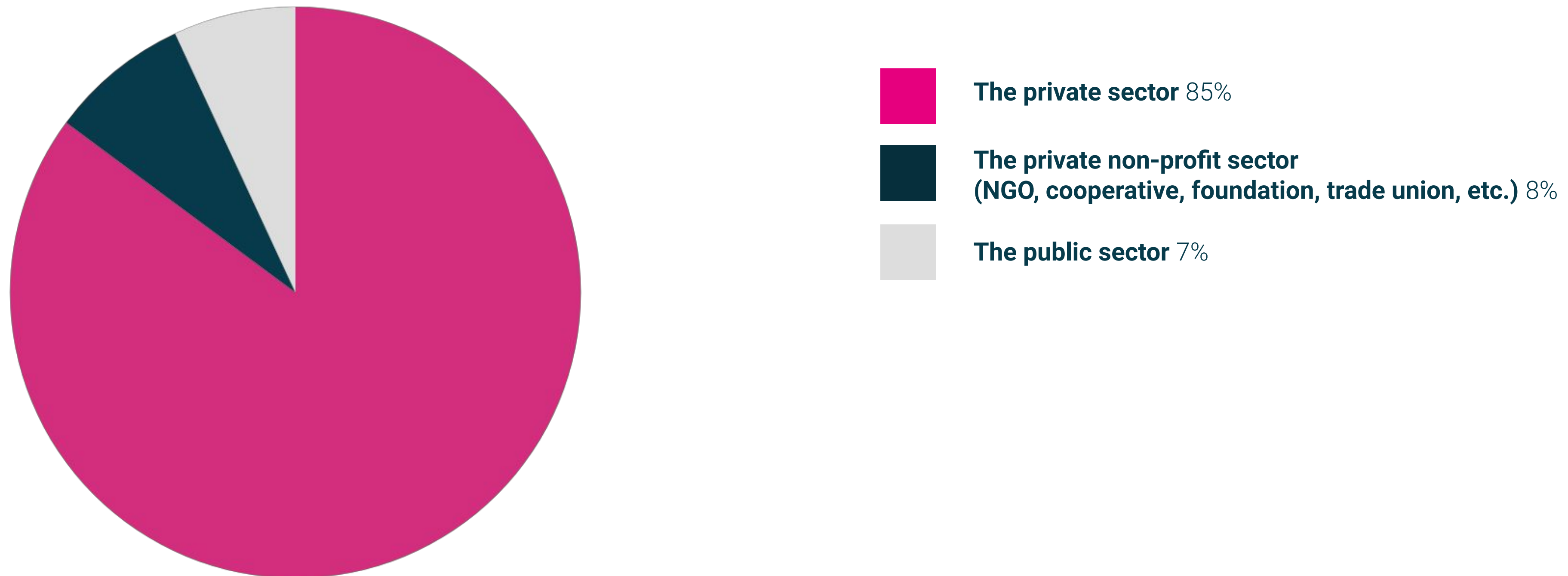


# *Profiles of the* **organisations**



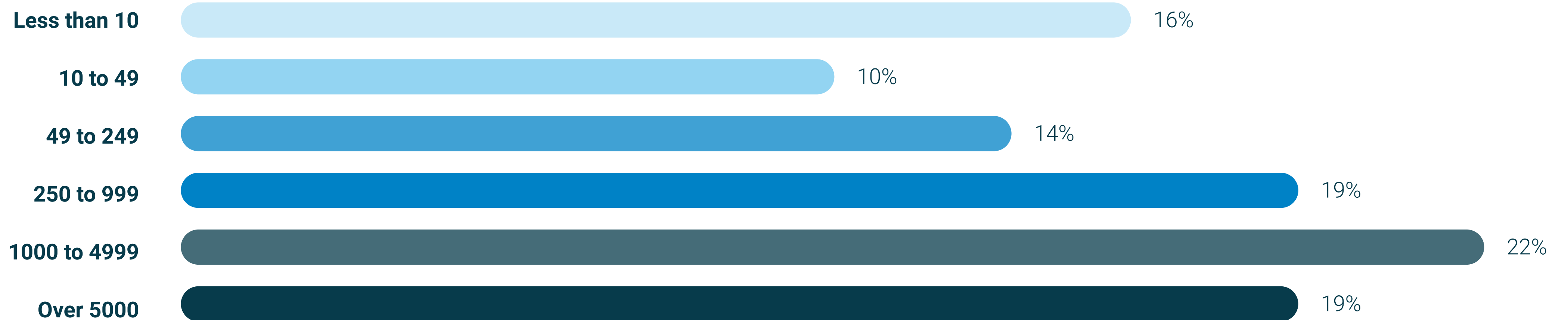


# *What sector are you currently working in?*



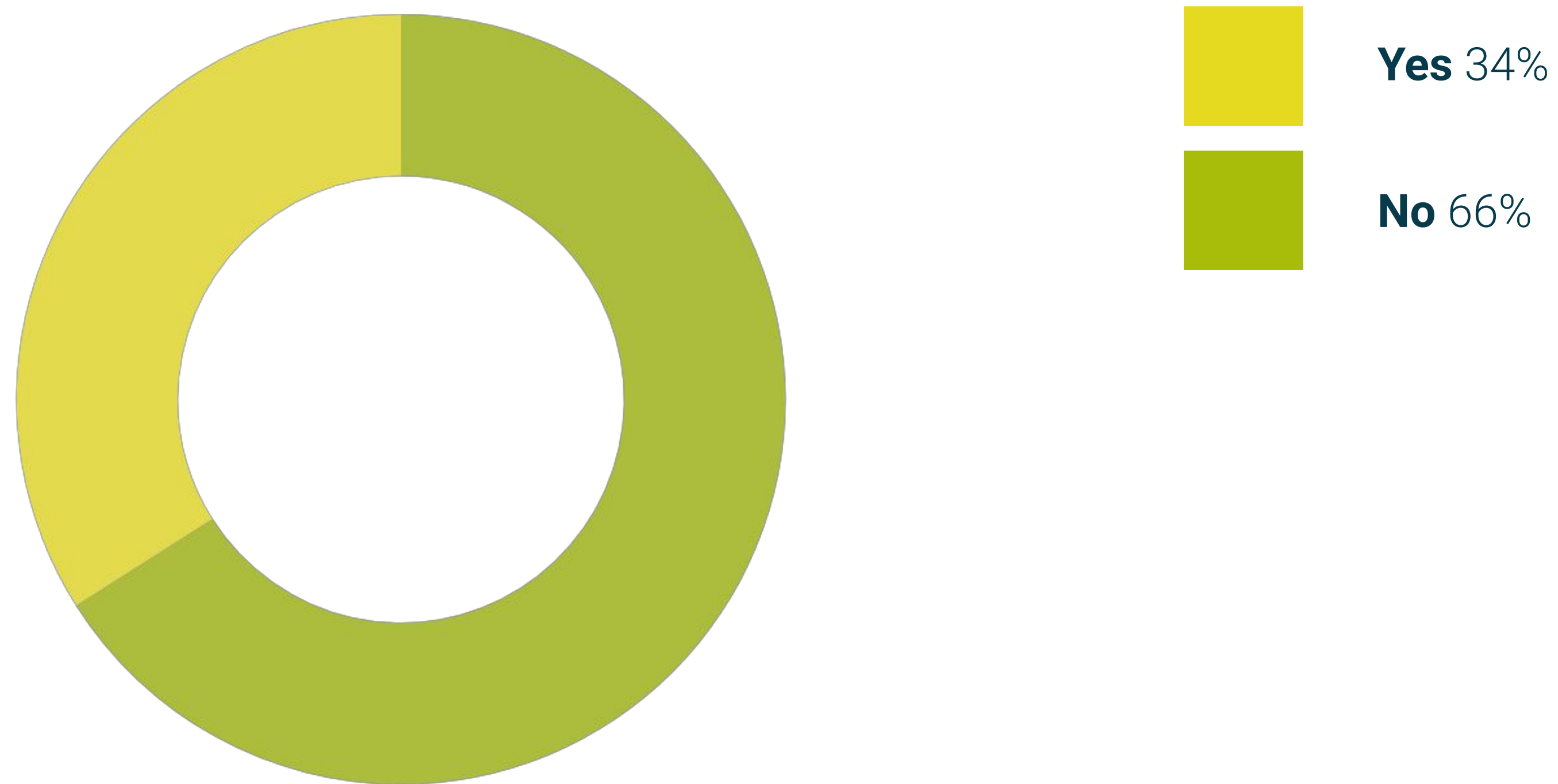


# *How many employees does your company/organisation have?*



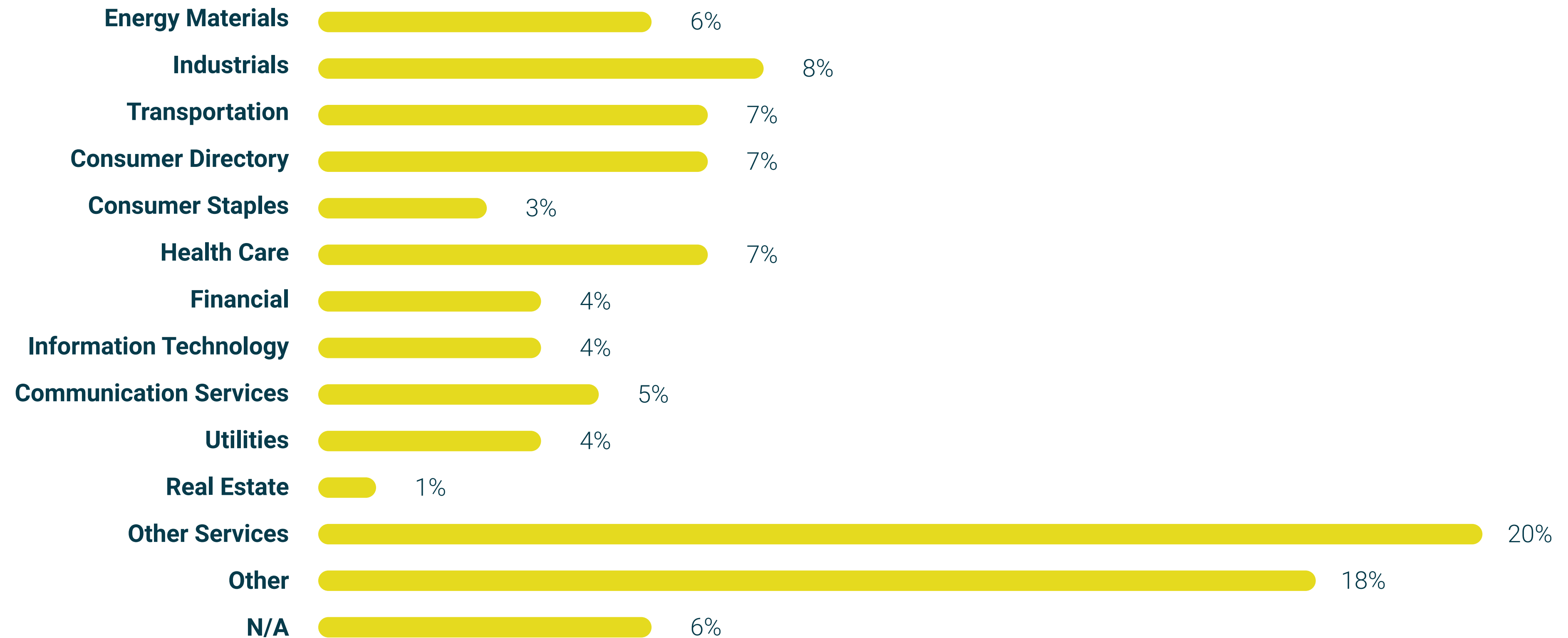


# *Is your company/organisation* **a subsidiary of an international Group?**





# *What is your* company's main sector?\*



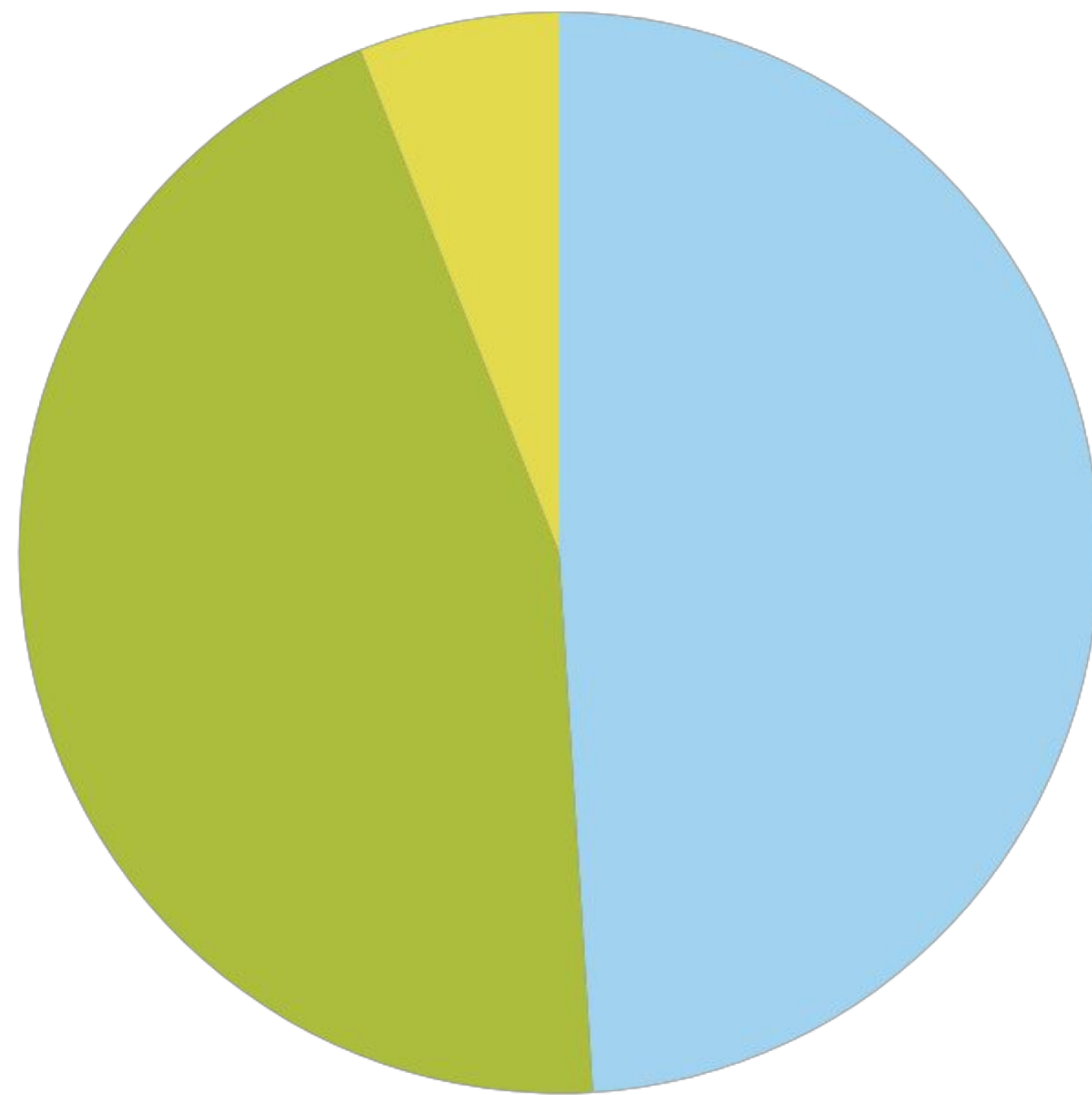







# Individual Respondents



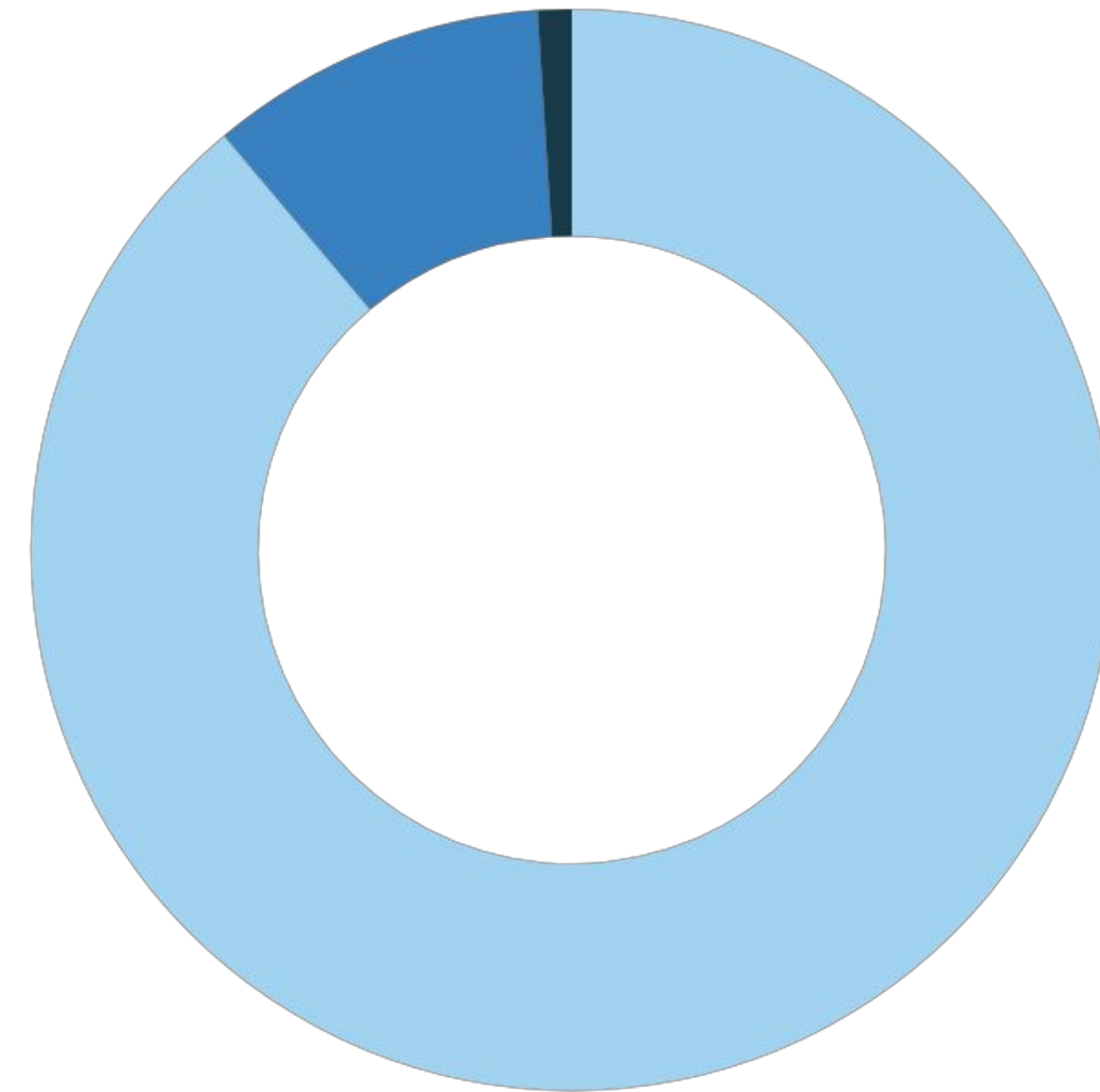
# *Which phrase best describes your situation?*



-  **I incorporate Sustainability among my broader responsibilities** 49%
-  **I am a professional whose activity is solely related to sustainability** 45%
-  **None of the above** 6%



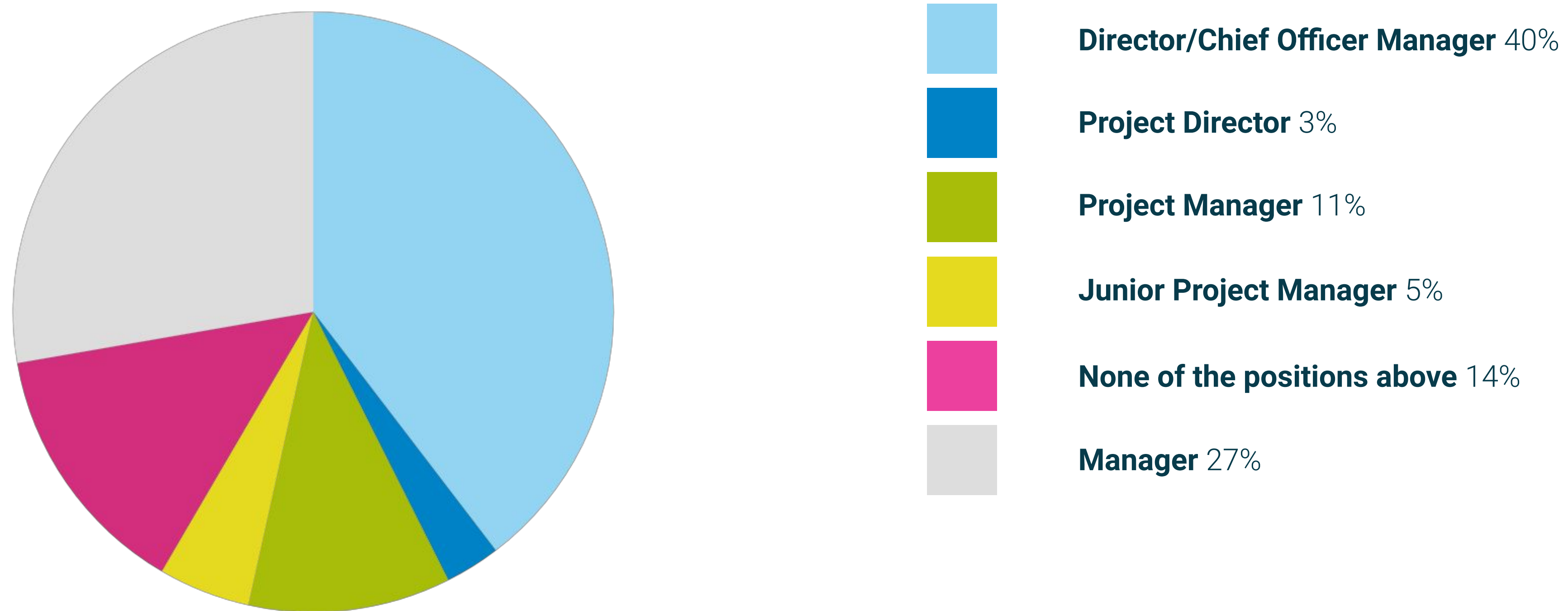
# *What is your current status?*





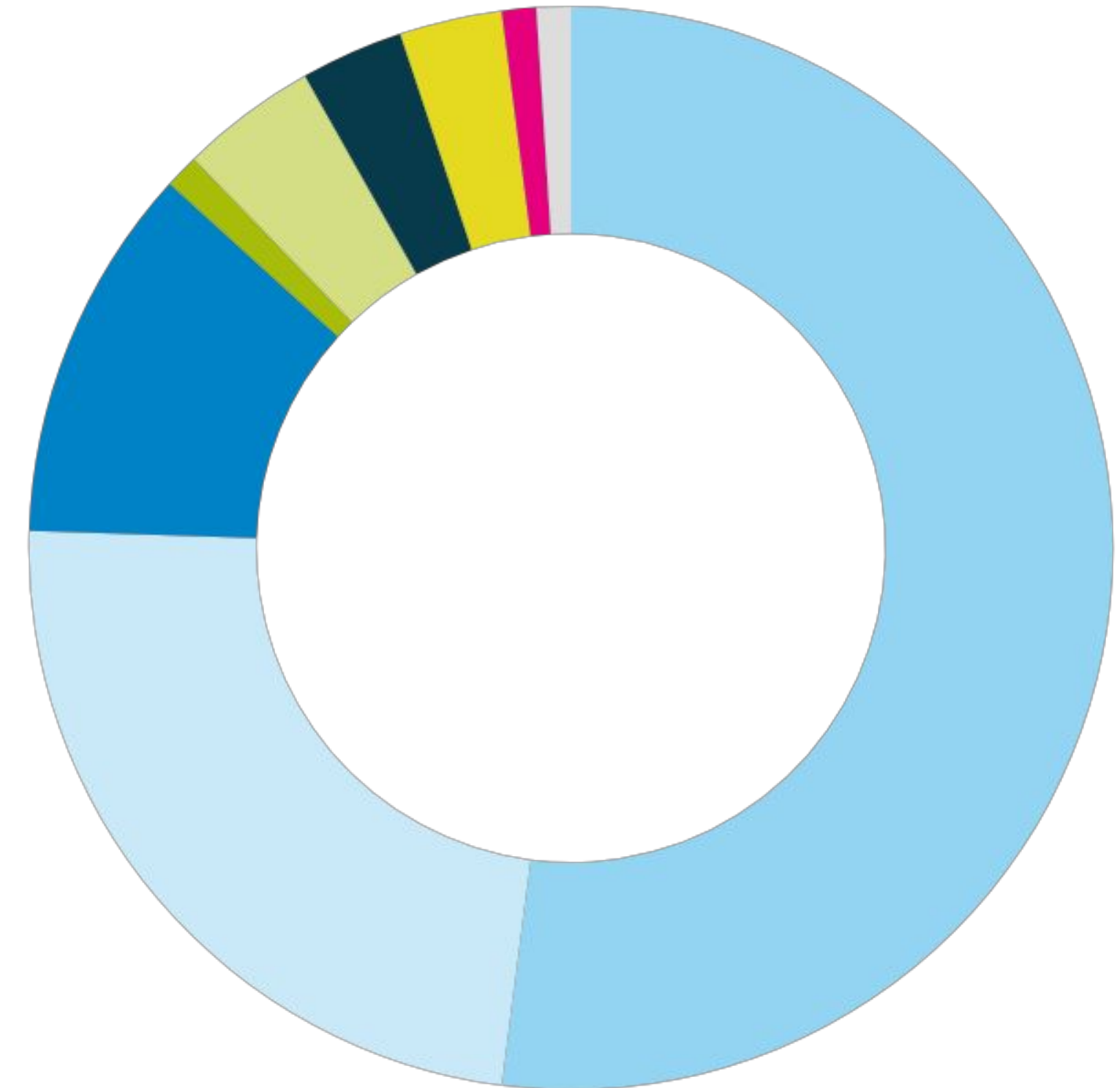
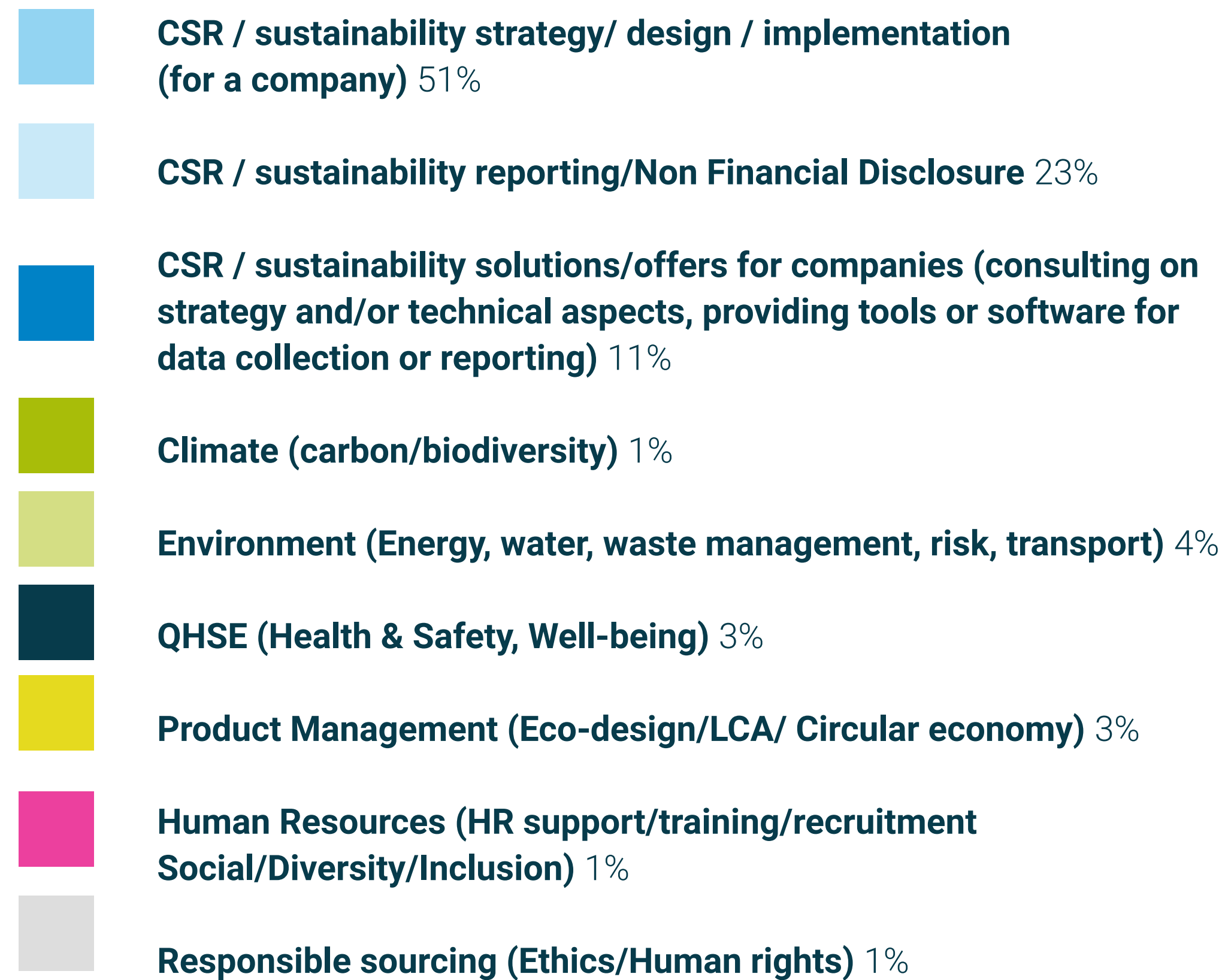
# *Which of the following titles/functions best describes your position?*

## best describes your position?



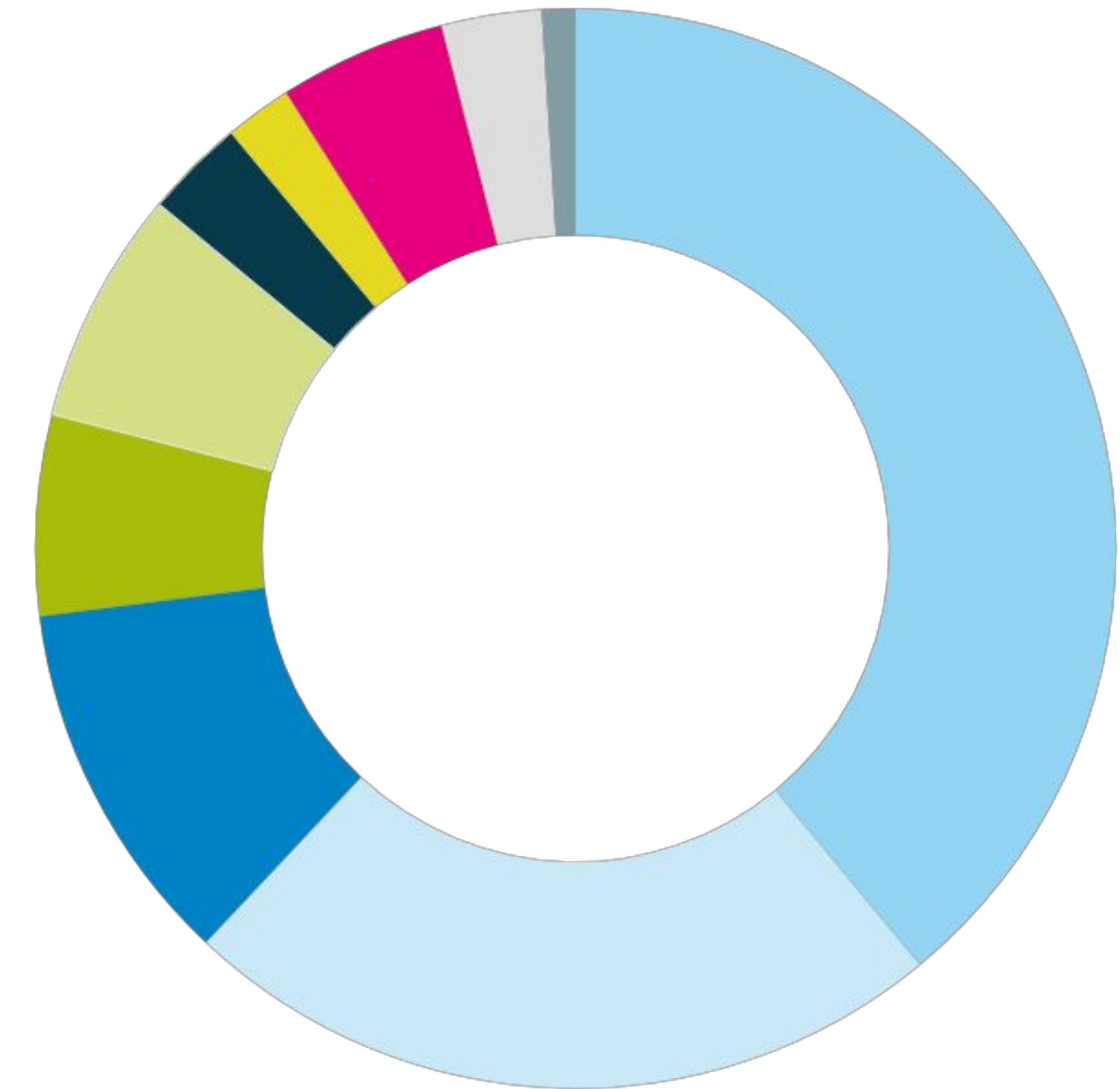


# What is your main area of expertise?\*





# What is your secondary area of expertise?\*

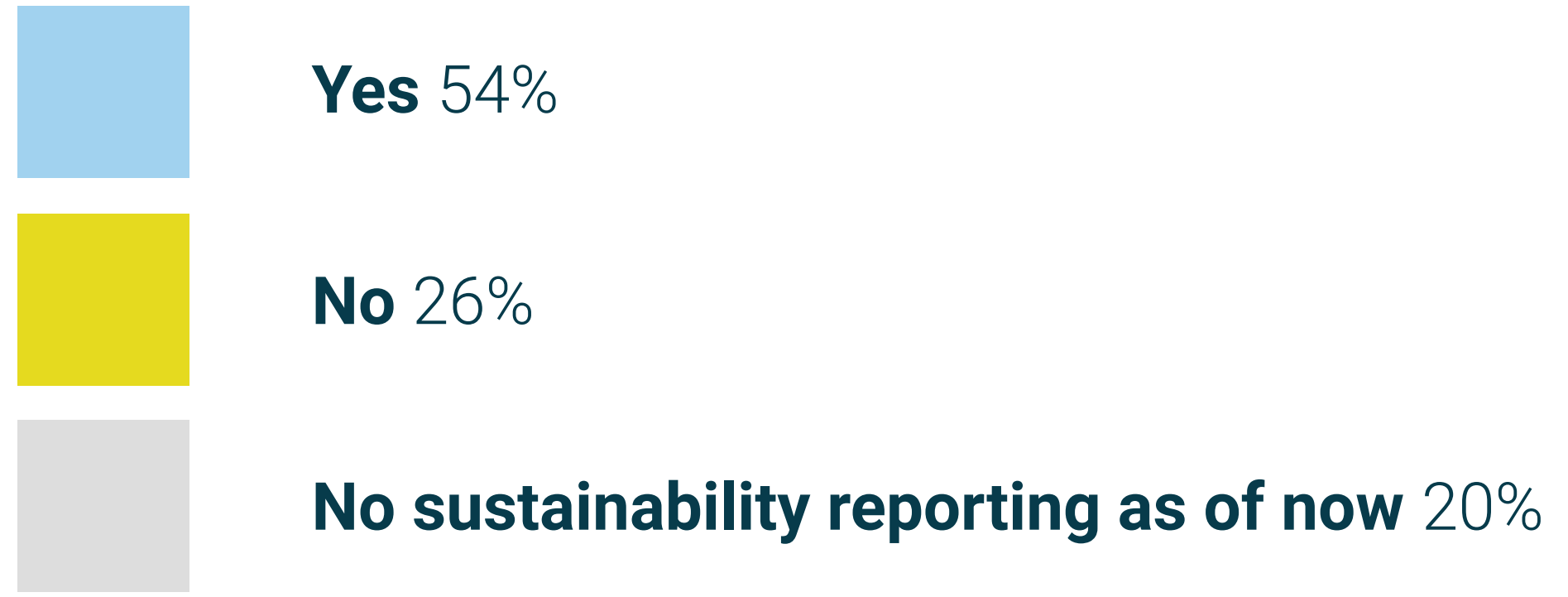
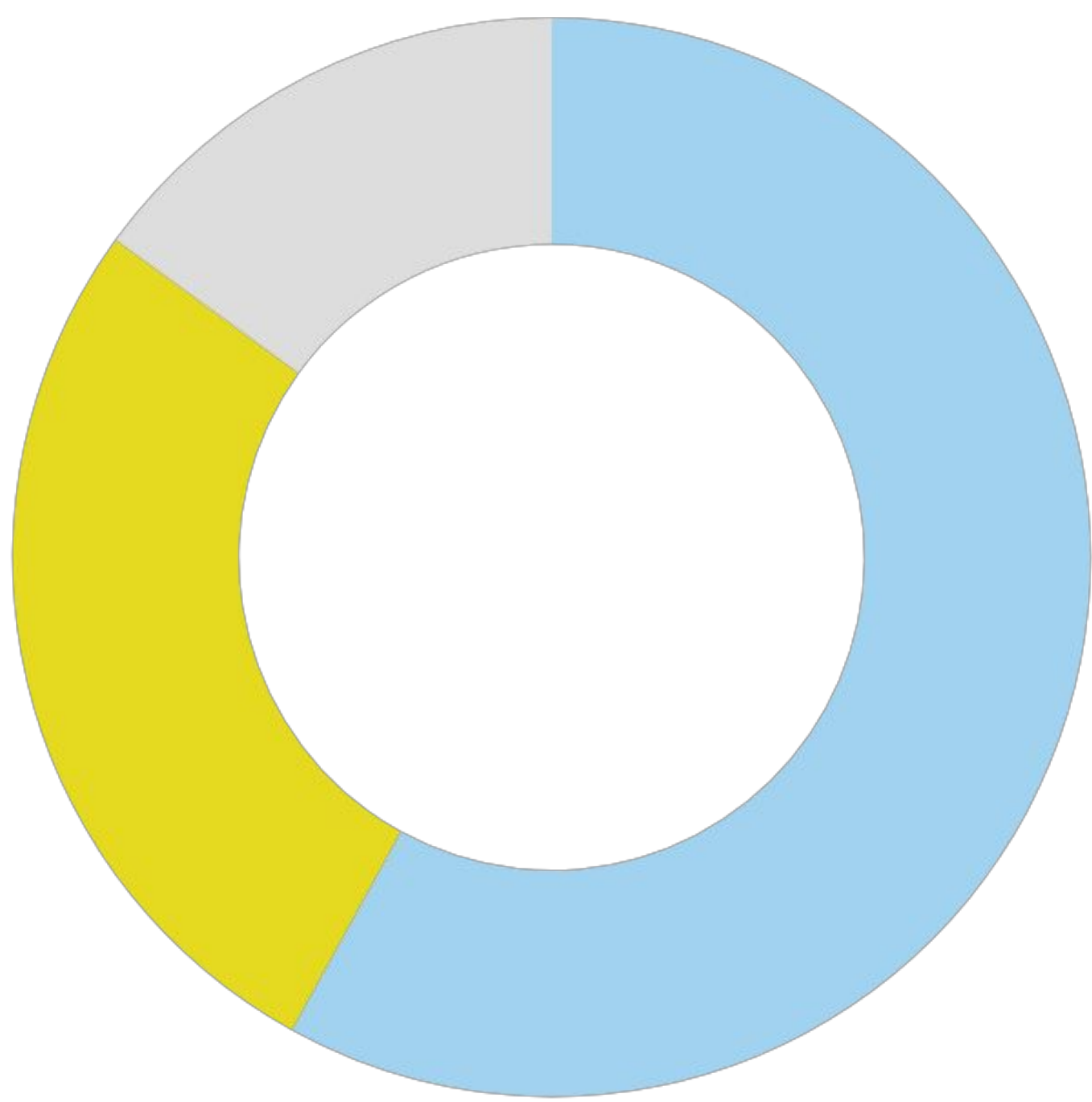


\*ex Spain





# *Are you in charge* of current sustainability reporting?





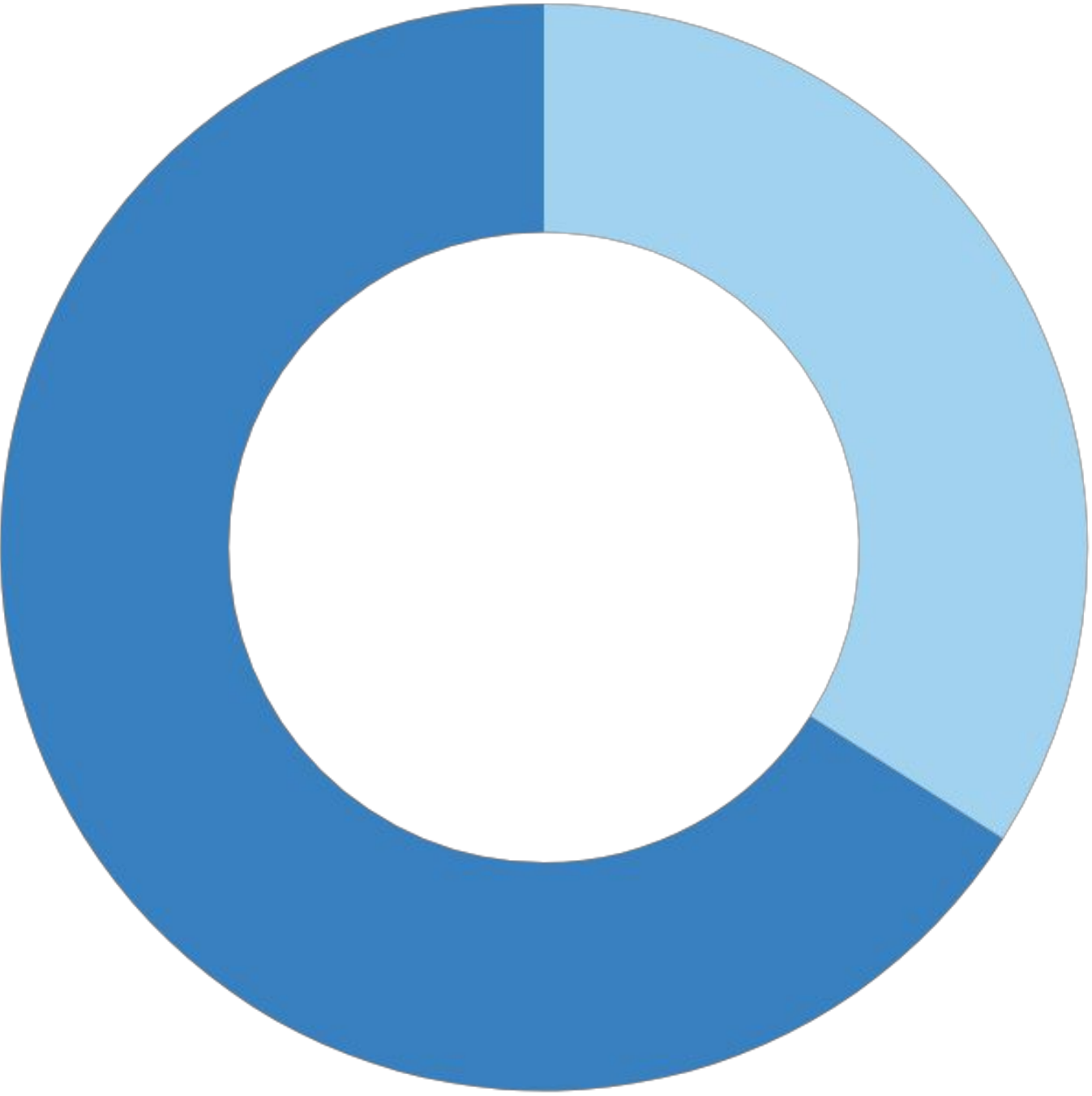
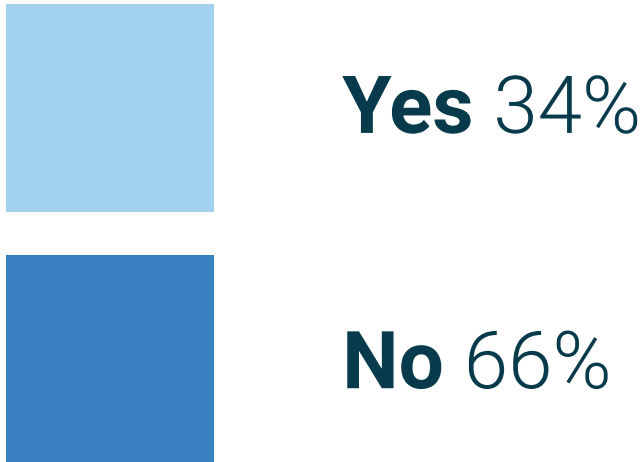


# *CSR and* **governance**





# *Are you a member of the* **Executive Committee?**



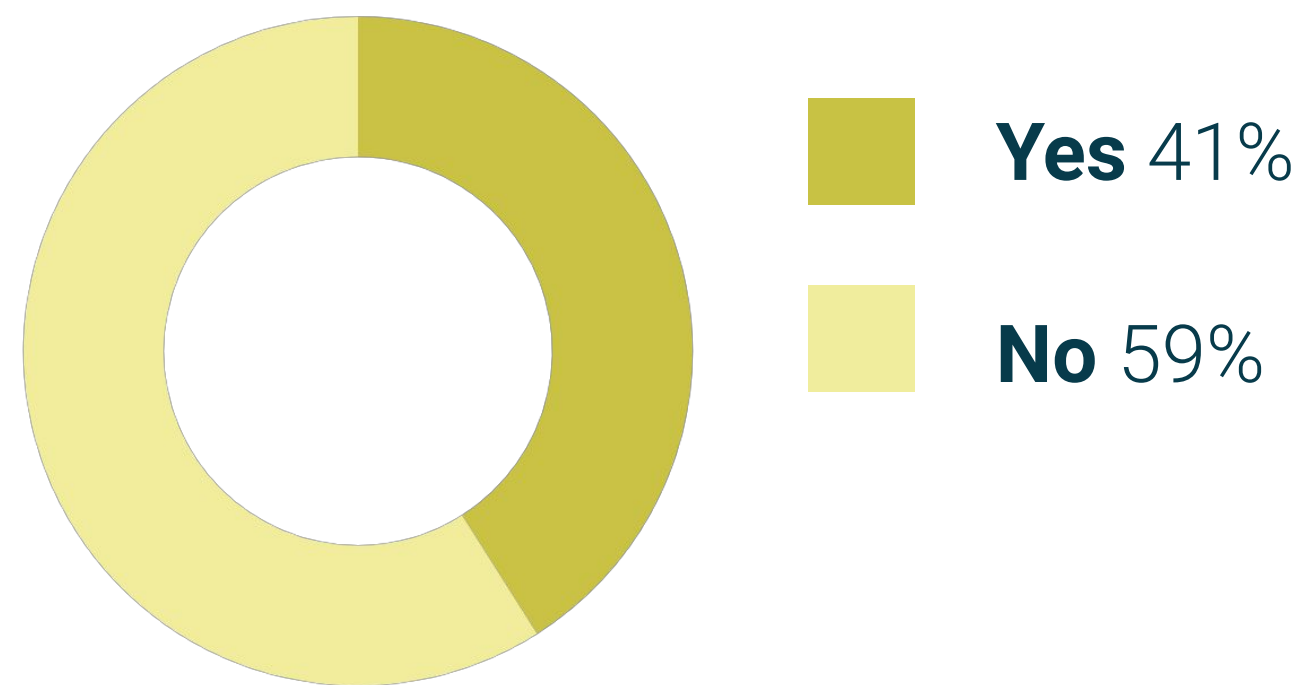


# At country level, are CSR managers members of the Executive Committee?

Spain



Germany

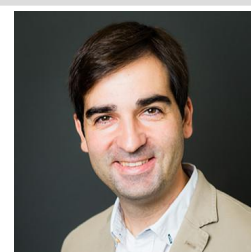


UK



Before the CSRD, Spain already had robust regulations concerning non-financial information. This gave the country an advantage compared to others in terms of organising information, structuring teams, and defining its strategic role. Spain had already gone through what other countries are experiencing today with the implementation of the CSRD.

Carlos Arango Arconada



From our experience, it is evident that CSR representatives are not yet part of executive committees. However, we have observed a shift from single-topic internal committees to sustainability teams that maintain close connections with executive committees. This indicates progress toward adopting a more holistic strategy.

Birgit Gieren



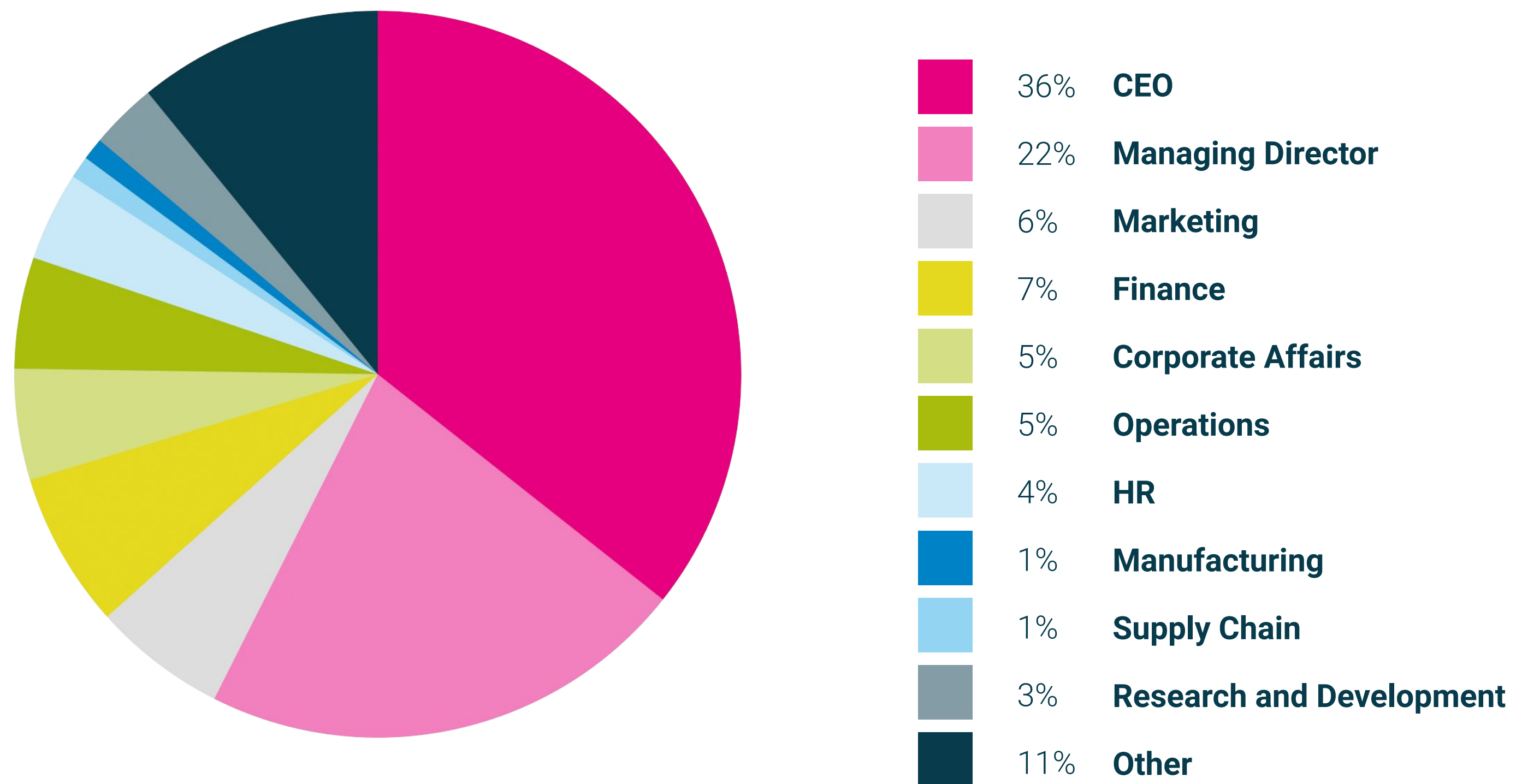
One significant development over the 12-18 months has been the extent to which ESG has attracted far more attention from corporate functions that have not previously been heavily involved. Previously a quarter to a third of large companies (FTSE 100 and similar) located sustainability/ESG in Corporate/Public Affairs. Increasingly, Marketing and Finance are taking on the responsibility. CFOs in particular are becoming keener to “own” ESG strategy and reporting – especially in relation to climate change.

Paul Burke





# *If you are not part of the Executive Committee* **who is the Executive Committee Sponsor of CSR/Sustainability?\***



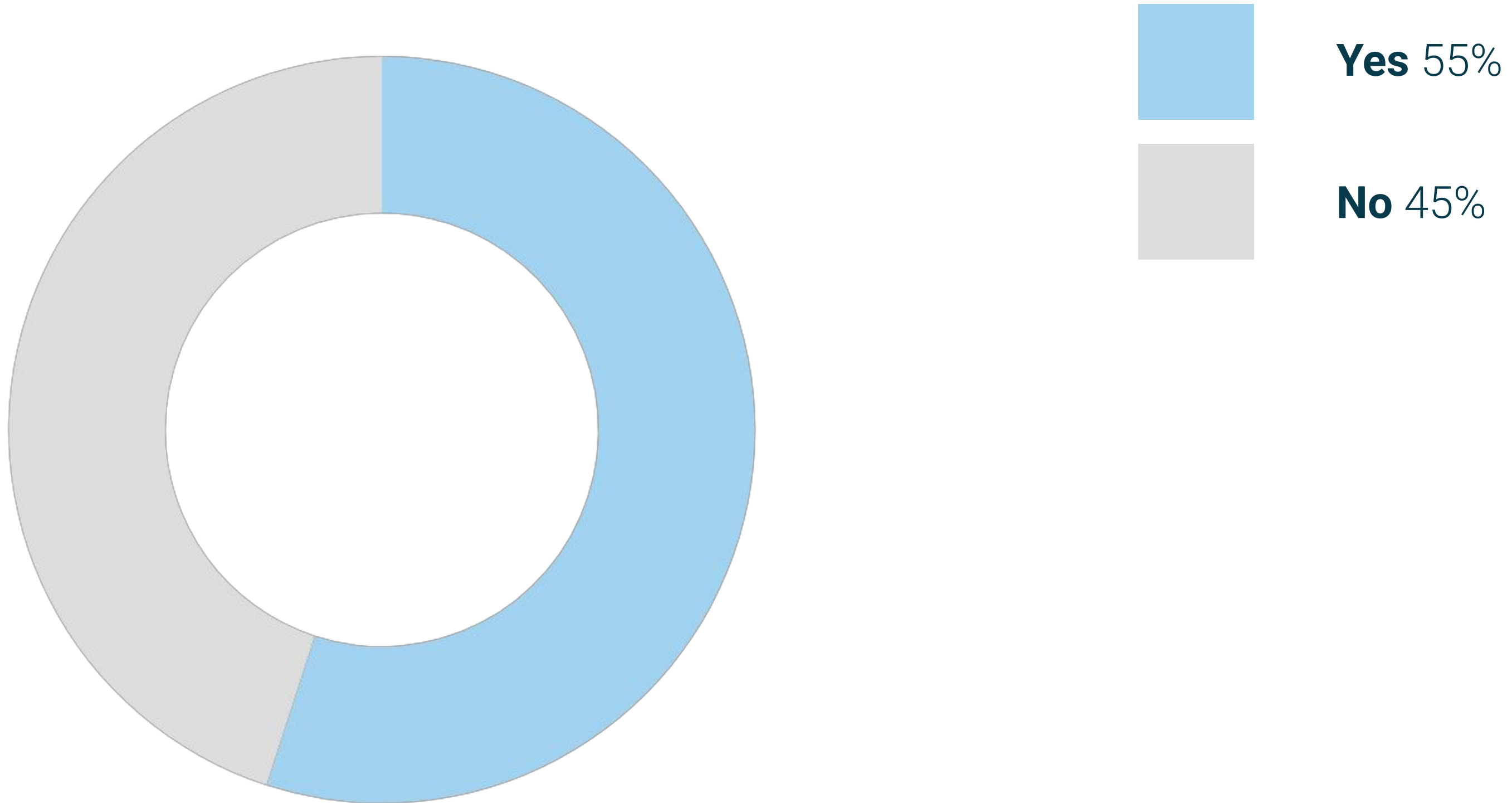
If CSR Directors are not part of the Executive Committee, the responsibility for sponsoring Sustainability typically falls to the CEO or Managing Director, occurring in 58% of cases.

\*ex Spain



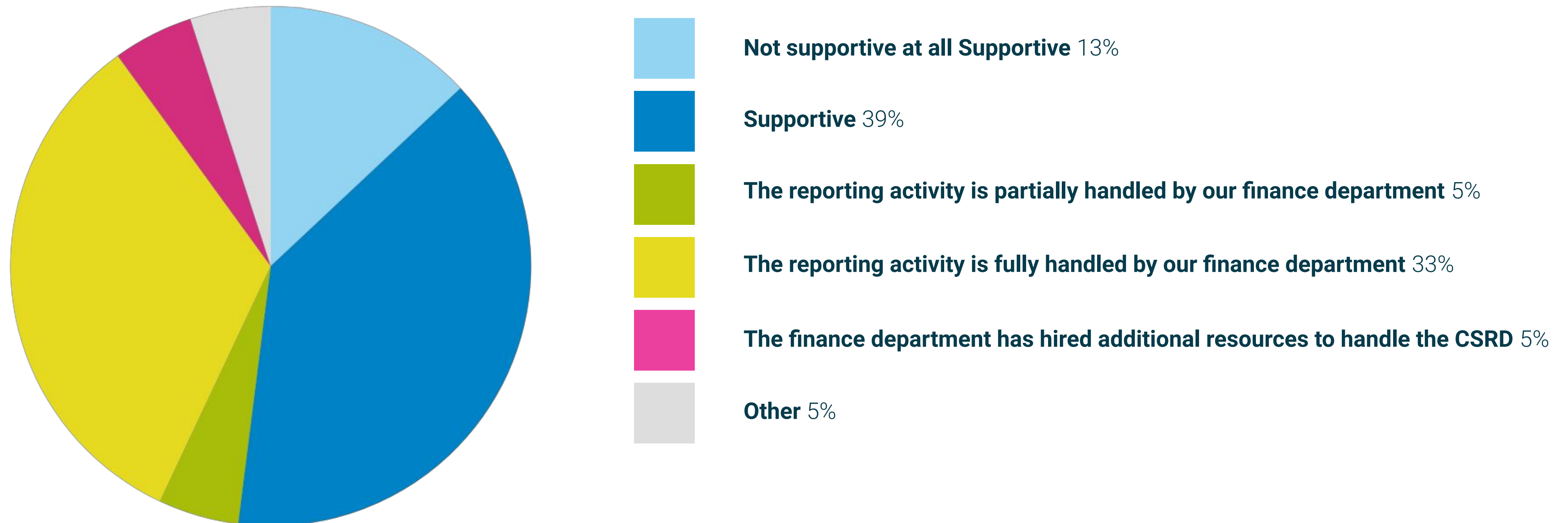


# *Are you in charge of a team (excluding interns and external contractors)?*





# *How is your financial department supporting the CSRD implementation?*





# *How is your financial department supporting the CSRD implementation at a country level?*



Spain has the highest percentage of respondents indicating that the reporting activity is partially managed by the finance department, with 46%.

**Carlos Arango Arconada** explains: "Auditing is one of the main reasons for this, and certainly now CSR departments have a greater opportunity to drive change more effectively because other key departments, like Finance, are 'on board' with responsibilities and mandatory activities. These are not secondary or peripheral departments, but essential ones that play a critical role."



In France, over 53% of companies described the role of finance as "supportive." "The CSRD regulation will significantly raise expectations for Sustainability Reporting, particularly regarding the robustness of extra-financial data, the capabilities of reporting tools, the comprehensiveness of the reporting protocol, and the implementation of numerous internal controls. These competencies align closely with the skill set typically found in the Controller profiles within finance teams. In large corporations, we can anticipate the establishment of dedicated Sustainable Finance departments to address external auditors' inquiries about extra-financial quantitative data", **Sébastien Mandron**



In the UK, **Paul Burke** highlights: "one significant development over the 12-18 months has been the extent to which ESG has attracted far more attention from corporate functions that have not previously been heavily involved. Why has this happened? In part, this reflects the growing financial dimension that attaches to safeguarding the business against the negative impacts of climate change and the costs of transitioning to a low carbon economy. Additionally, CSRD/Double Material, TCFD, and greenhouse reporting are subject to external audit and CFOs traditionally have overseen the relationship with the auditors. Finally, companies already have financial reporting processes in place so it makes sense to expand their reach to include the collection and analysis of non-financial data."





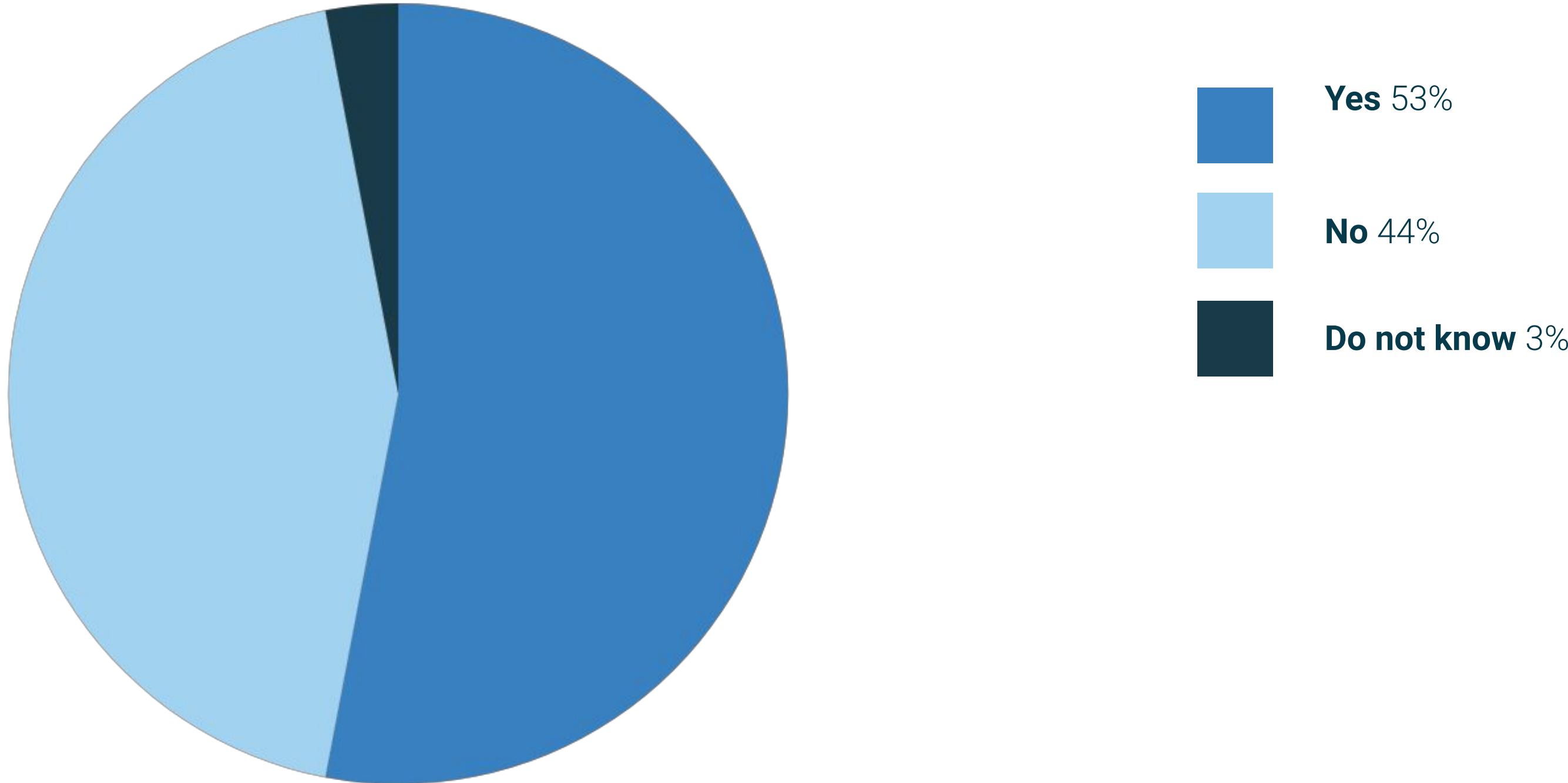


# *Impact of CSRD* on organisations





# *Is your organisation* **subject to the CSRD?\***

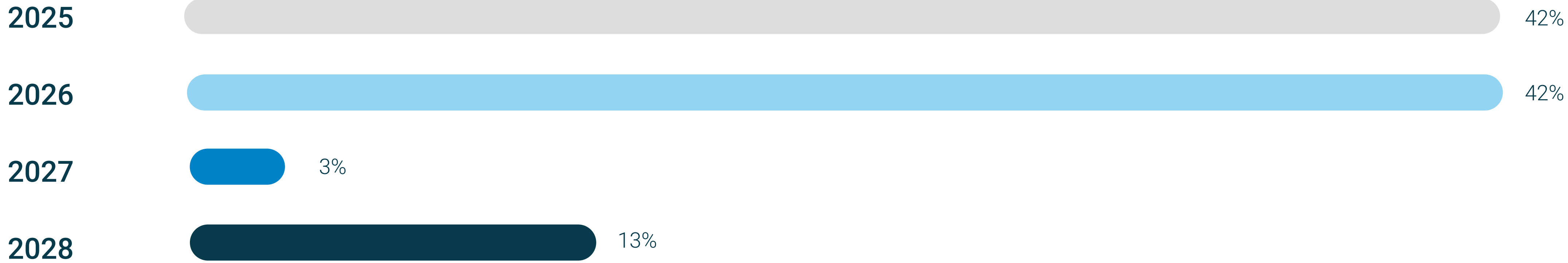


\*ex Spain



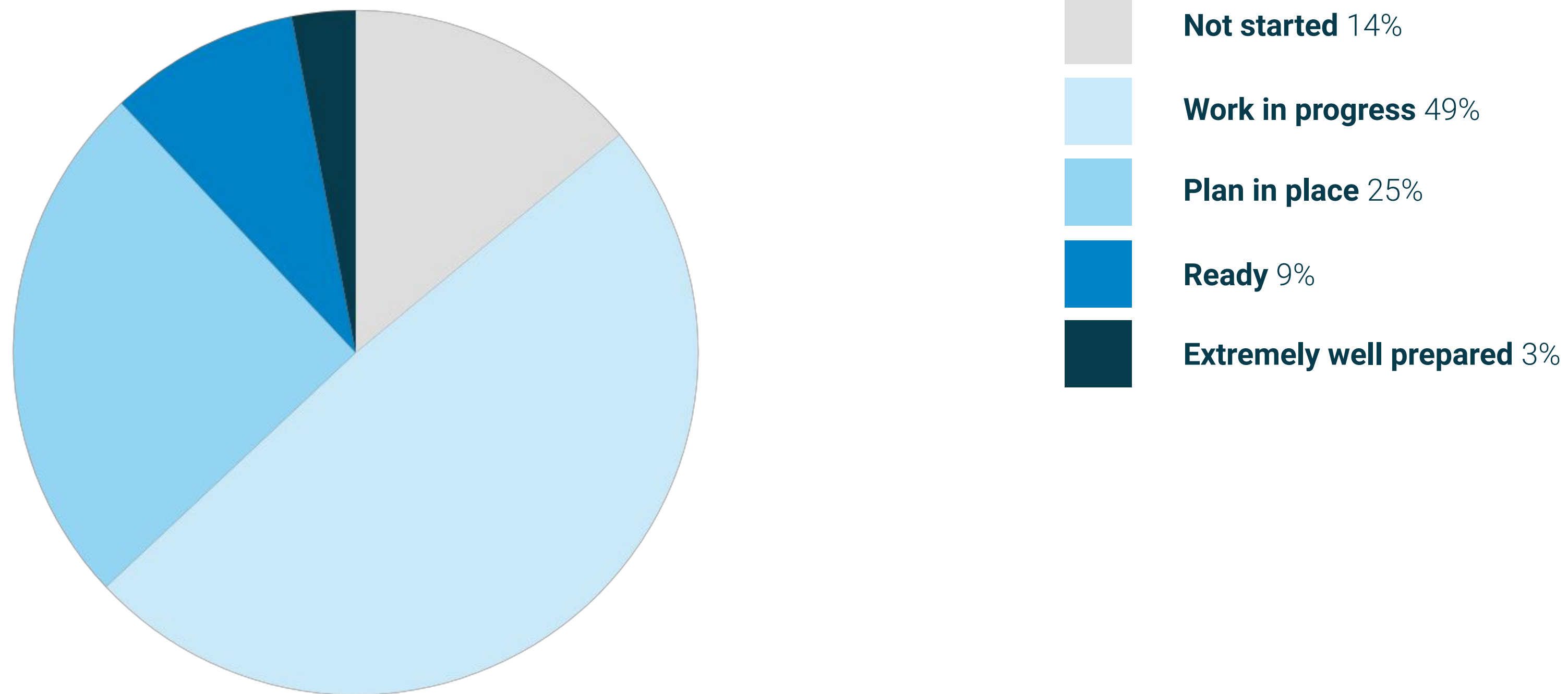


# *When will be your* first year of reporting as per the CSRD?



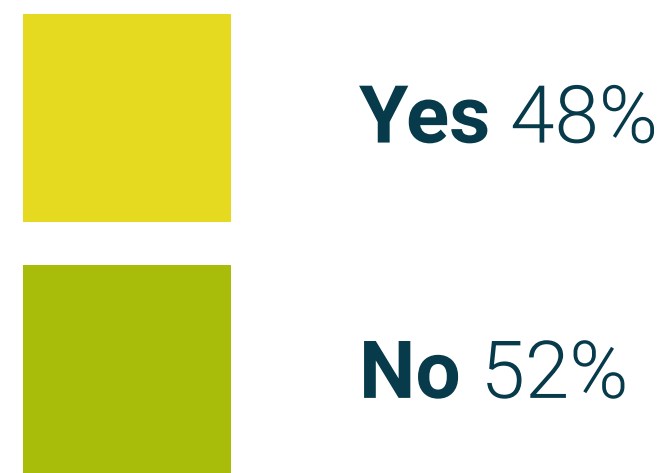


# *How would you rate the readiness of your organisation to the CSRD?*





# *Have you made changes to your organisation to better handle CSRD?*

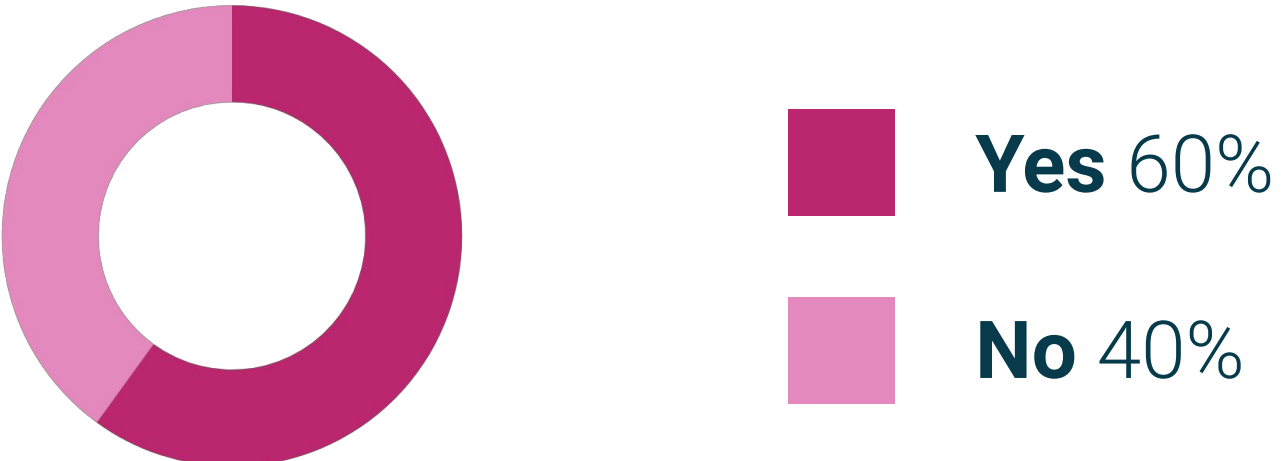




# Have you made changes to your organisation to better handle CSRD?



## Changes made in the organisation



## Changes made in the reporting level



In Italy, 50% of the respondents are companies with less than 250 employees.

In response to the CSRD, large Italian companies have implemented several significant changes to enhance their sustainability practices and reporting. These include hiring more personnel for sustainability departments, reflecting the increasing need for specialised expertise. Additionally, they have revised their materiality analysis processes to comply with the CSRD's double materiality assessment, evaluating both the impact of sustainability issues on financial performance and how their operations affect society and the environment.

Furthermore, many organisations are increasingly relying on external consulting firms to support their compliance efforts, allowing them to leverage specialised expertise and best practices in sustainability reporting and strategy. Conversely, for small and medium-sized enterprises, the primary change has been the introduction of the sustainability manager role. In addition to hiring sustainability managers, SMEs are also implementing sustainability training courses to educate employees.

Maria-Cristina Zaccone





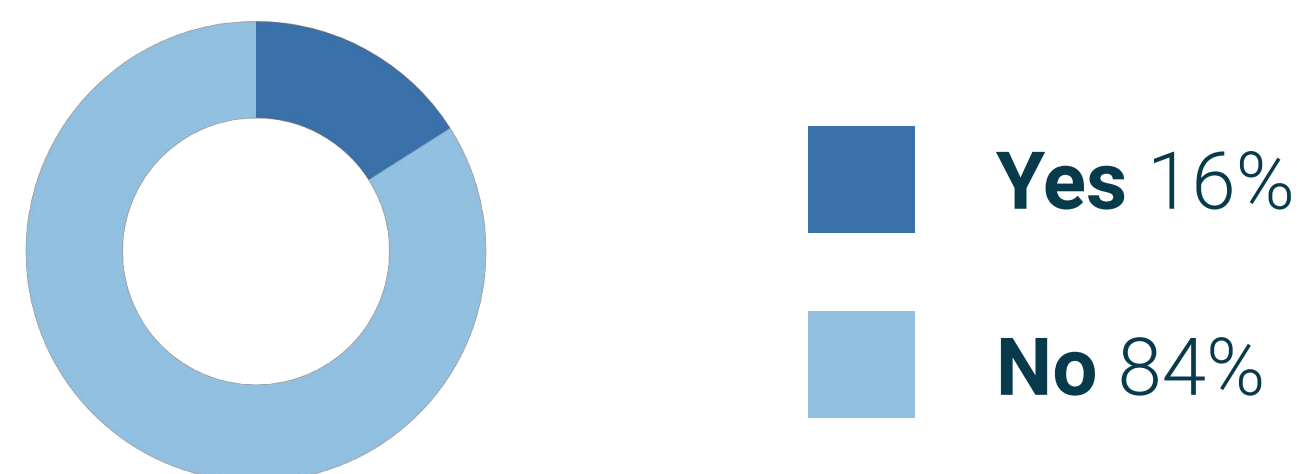
# Have you made changes to your organisation to better handle CSRD?



## Changes made in the organisation



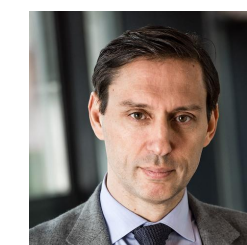
## Changes made in the reporting level



In France, 65% of the respondents are companies with less than 250 employees.

In France, no significant organisational changes occurred as a result of the new regulation. The existing CSR team took the lead on the reporting project, halting some of their ongoing CSR initiatives to allocate the necessary time to this new sustainability reporting. Nevertheless, the CSRD regulation has already prompted questions from the Board of Directors to better understand the company's impacts and the associated transformations. As the CSRD drives new strategic discussions, we can anticipate that the company's organisational structure will evolve to facilitate more frequent and effective interactions between the Board of Directors and the CSR officer.

Sébastien Mandron





# *Have you made changes to your organisation to better handle CSRD?*



## Changes made in the organisation



**Yes** 47%

**No** 53%

## Changes made in the reporting level



**Yes** 71%

**No** 29%

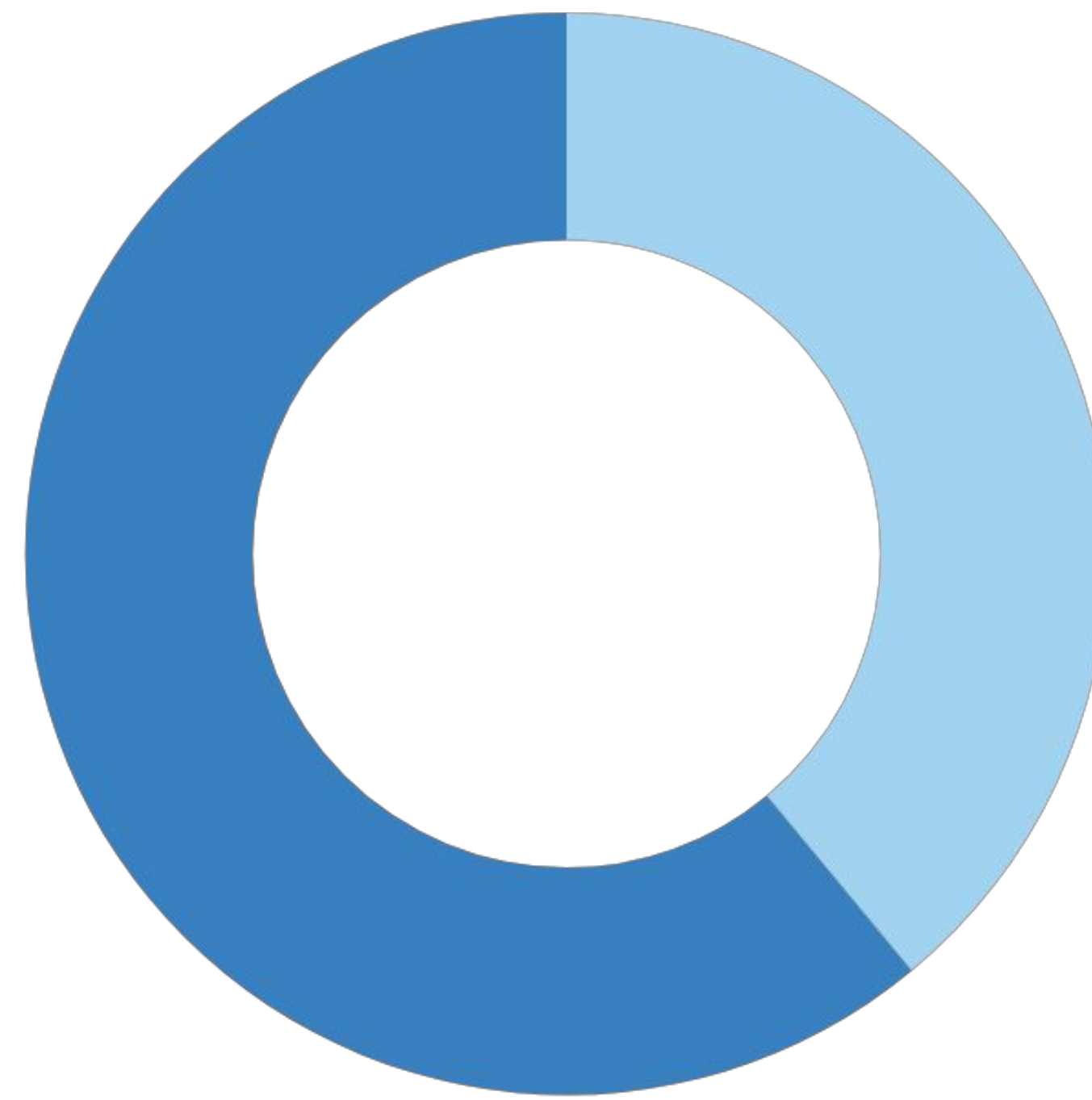
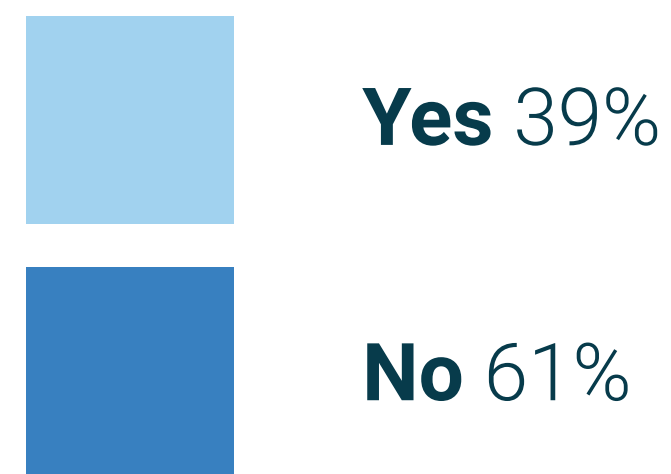
We recognise that sustainability topics are becoming increasingly important, a trend reinforced by new regulations. We believe we are witnessing a trickle-down effect: organisations required to report are now requesting information and data from their suppliers. As a result, more companies are being drawn into this process and must adapt to meet the new requirements.

Birgit Gieren



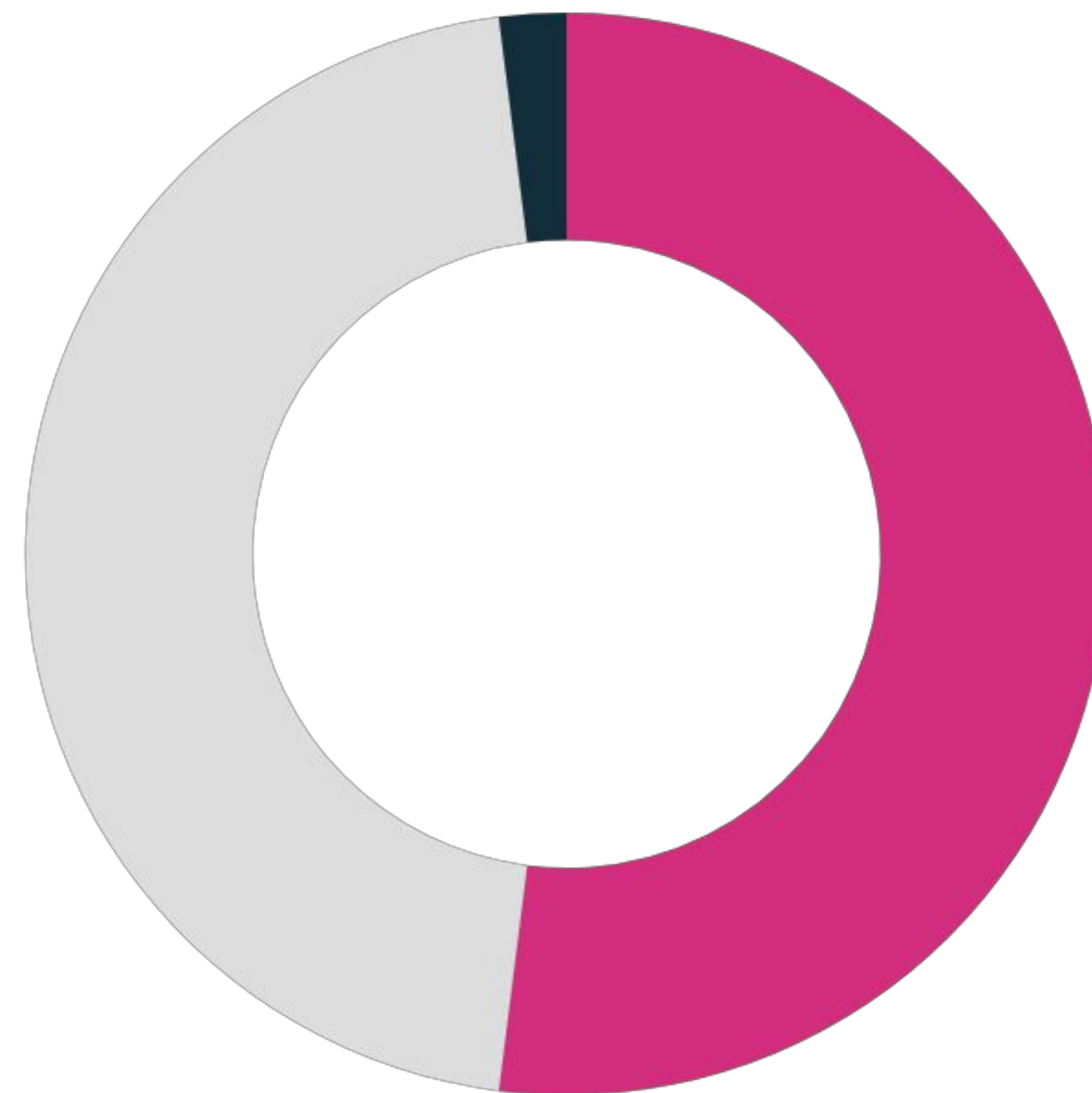
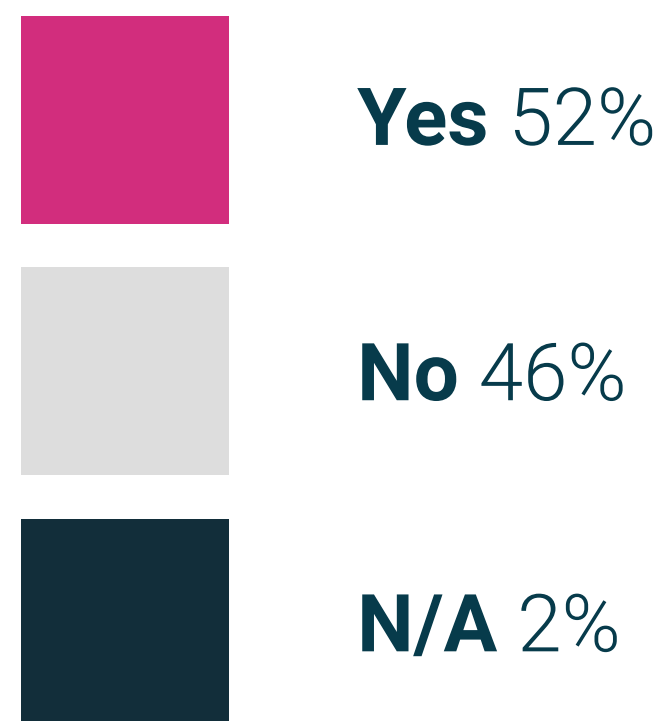


# *As CSRD is implemented, will (or did)* **your reporting level change?**



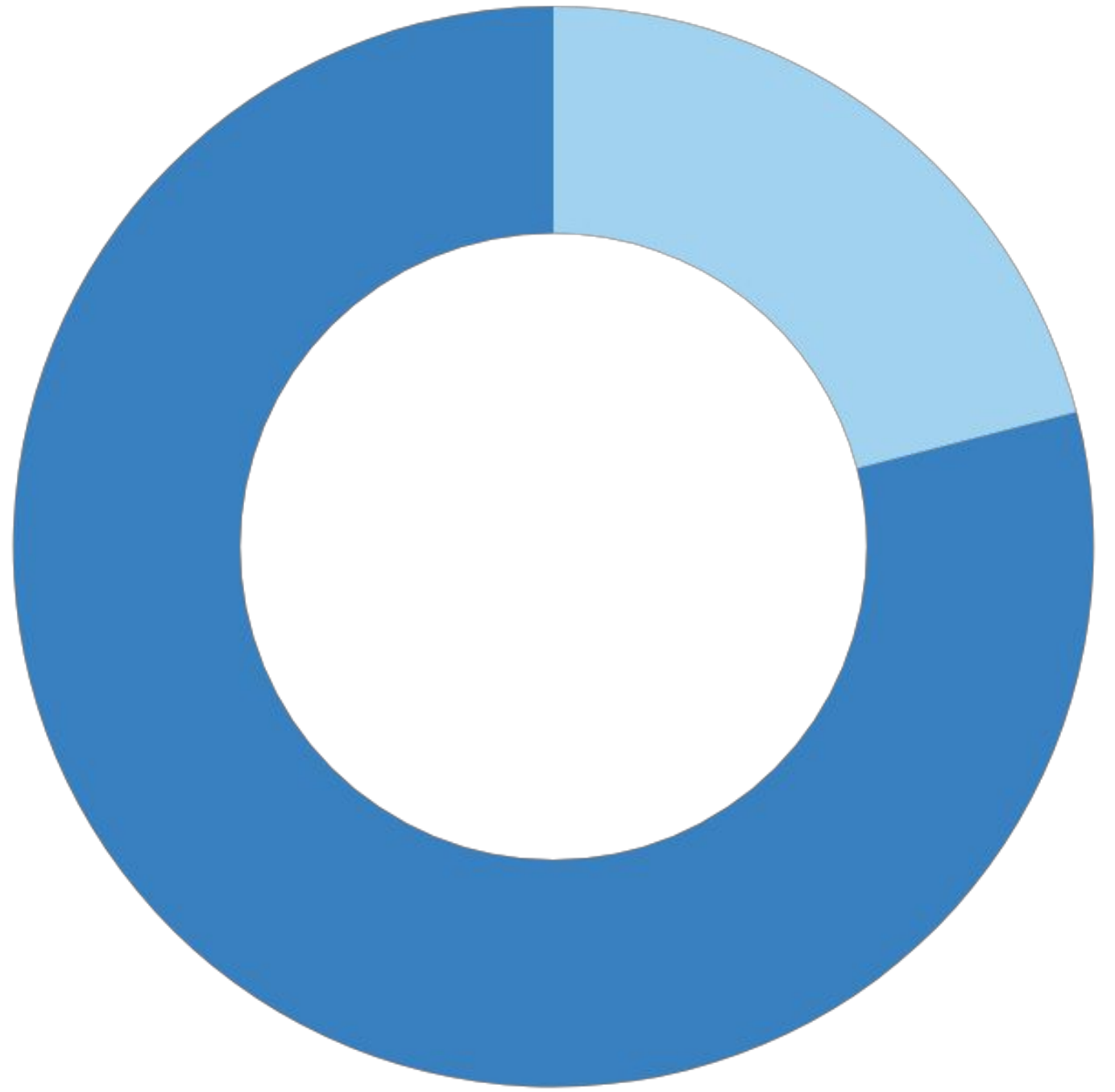
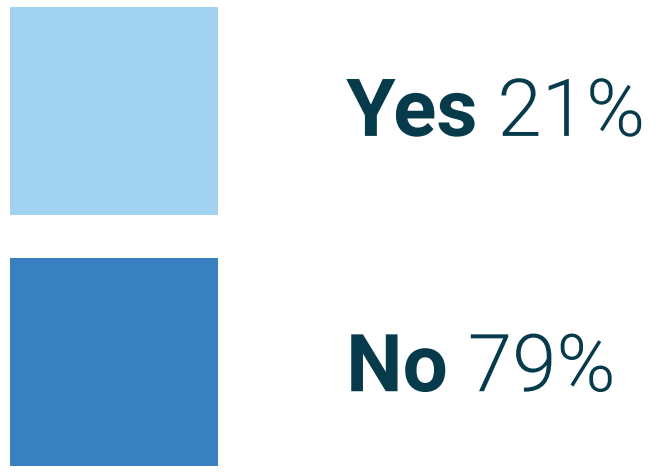


*If you answered No,*  
**do you think it should change?**





*Will your reporting line evolve to another department within the organisation?*





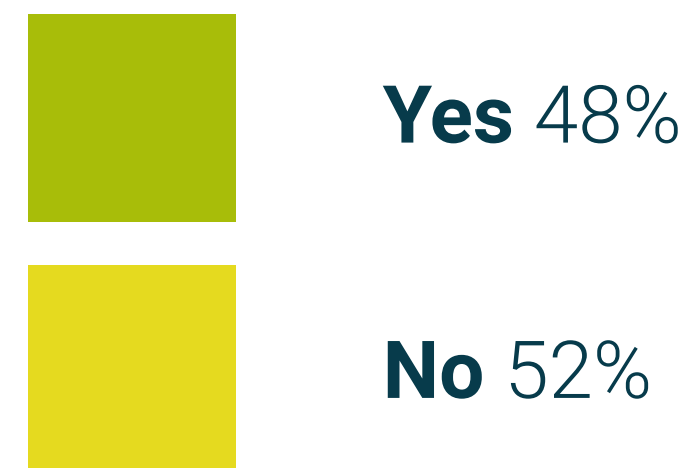


# *Impact of CSRD* on resources



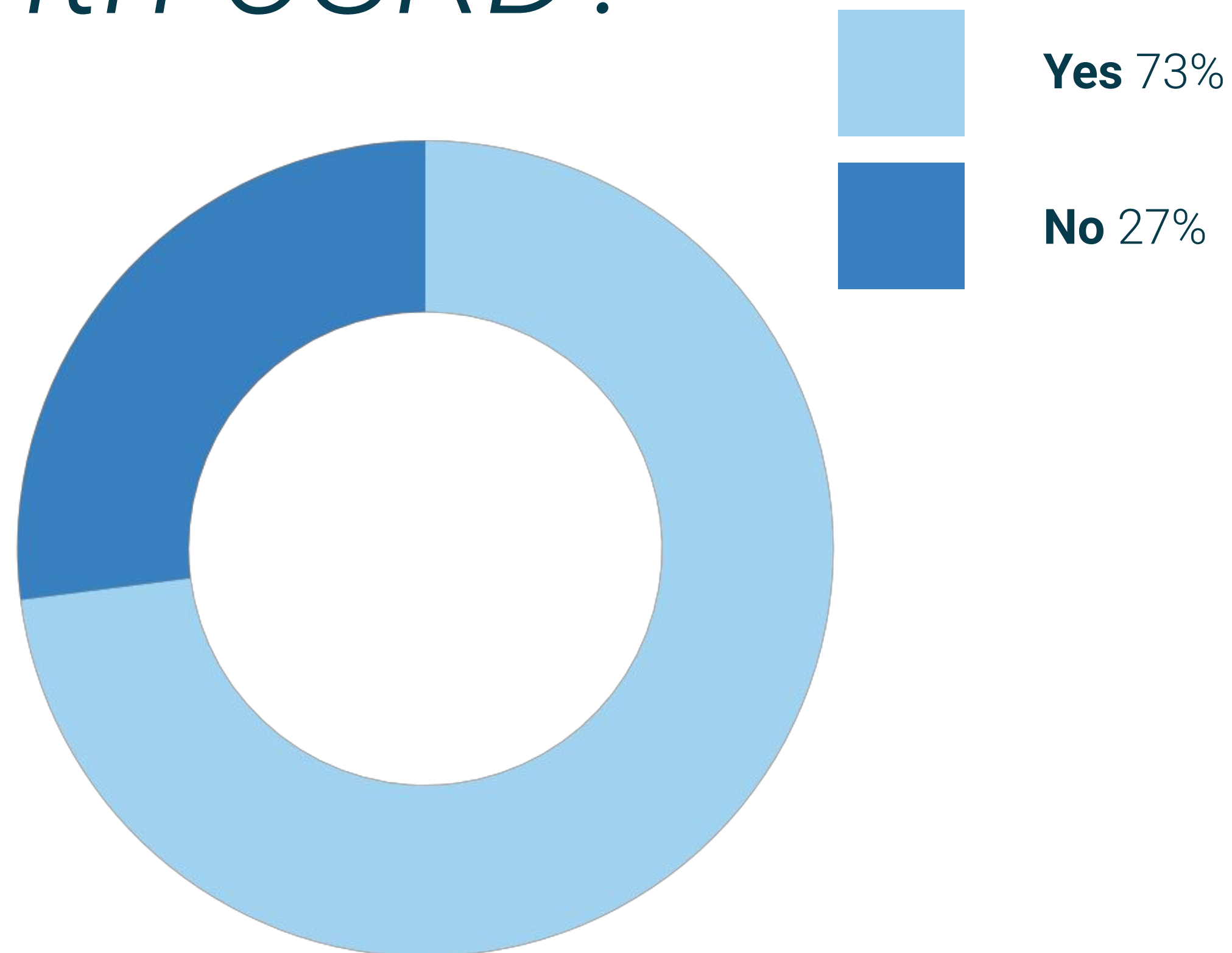


*Have you implemented new tools or systems to enhance* **the collection and analysis of sustainability data?\***





# Are you considering **adopting new technologies or tools** to facilitate compliance with CSRD?



The finding that 75% of Italian respondents plan to integrate new technology and tools to facilitate compliance with the CSRD is an indicator of the proactive approach companies are taking toward sustainability. This automation not only enhances accuracy by minimising human error but also accelerates the reporting timeline, enabling companies to respond more swiftly to regulatory requirements. As businesses increasingly adopt these innovative solutions, they are likely to enhance their overall sustainability strategies, foster a culture of continuous improvement, and contribute to long-term organisational resilience and success in the face of evolving regulatory landscapes.

Maria-Cristina Zaccone





# *Do you have a dedicated budget?*



**Yes** 52%

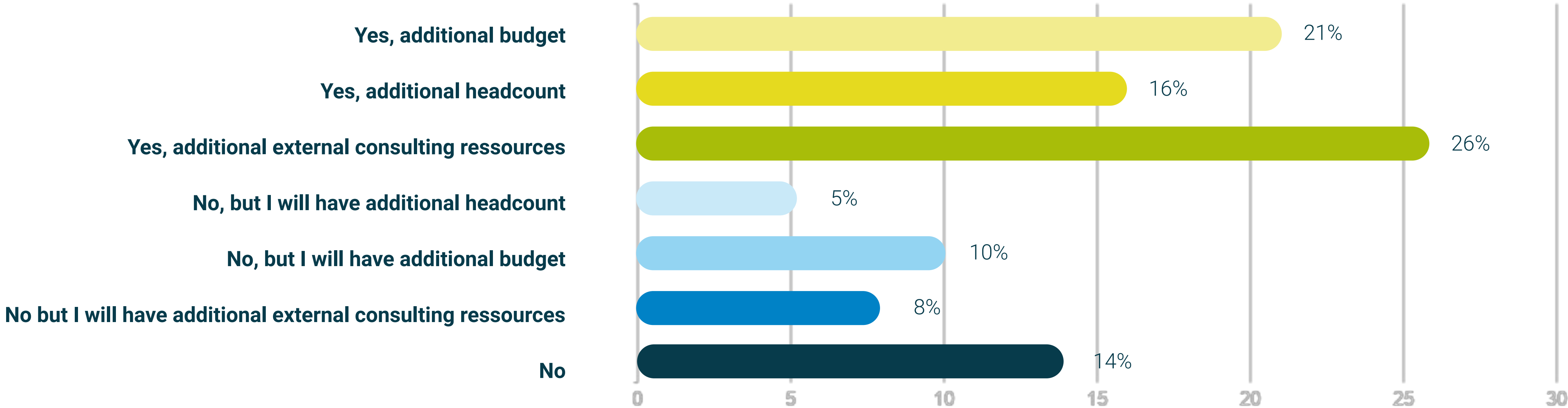


**No** 48%



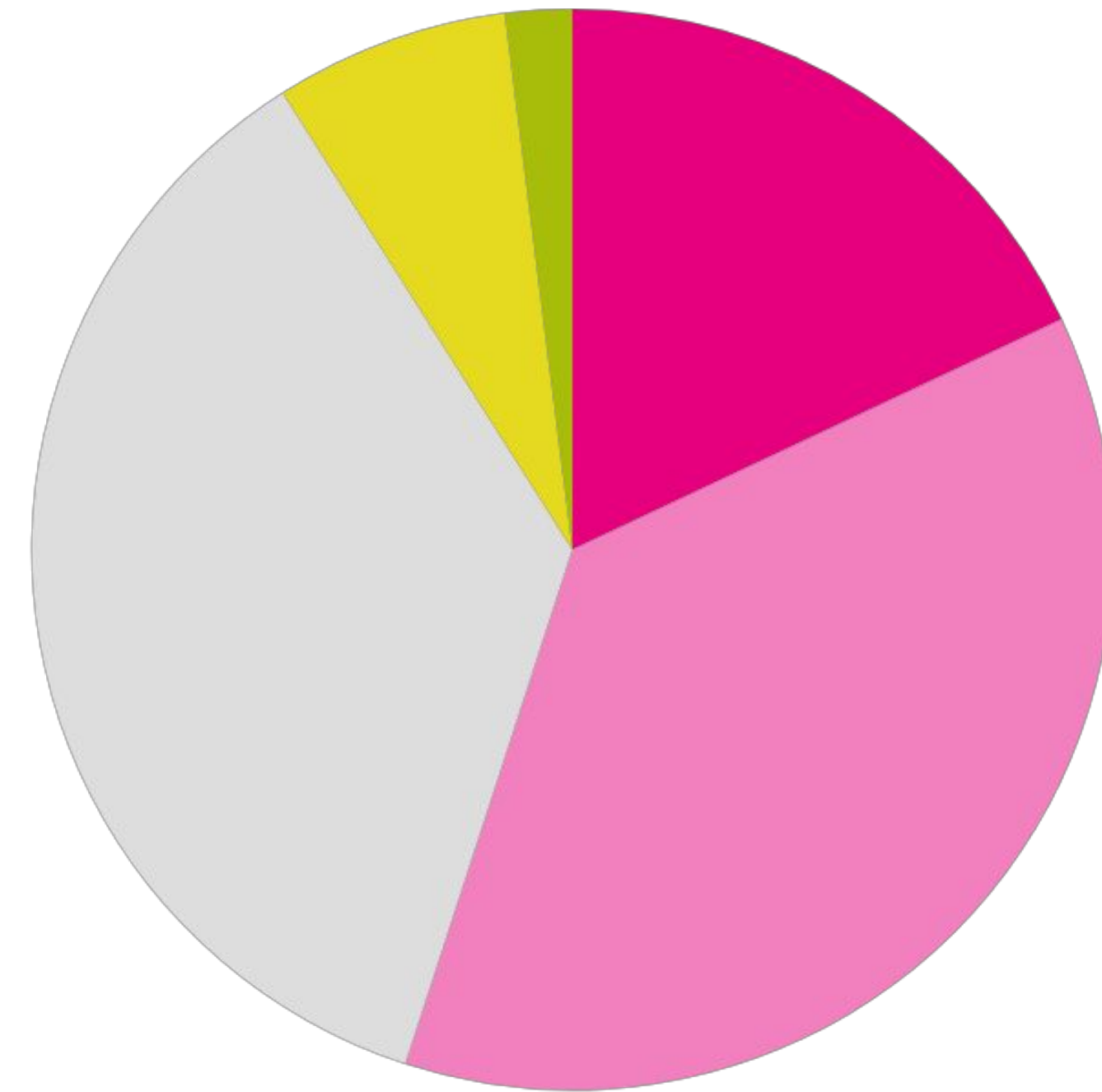


# *Do you have additional resources to manage CSRD?*





# *How would you rate your satisfaction with the resources allocated to the CSRD implementation?*







# *Conclusion*





# How do you view the next big step/change for CSR and CSR directors?

The next key change will be to leverage technology to ensure the CSRD does not hinder the sustainability department's activities but instead enhances them.



Maria-Cristina Zaccone

Once the reporting document will be delivered, CSR officer will need to focus on their new transformation programs and their climate transition plan. The set-up and the financing of the Climate Transition plan will be a major milestone because it has to be aligned with the Climate Paris Agreement where the ambition is very high regarding the reduction of the CO2 emissions. This climate transition plan will trigger lot of strategic discussions with General Management departments such as Finance, Risks, Strategy, Procurement, HR, to ensure that he communicated climate target can be delivered as communicated.



Sébastien Mandron

Tear down the walls between business and sustainability.



Birgit Gieren

Even more seated in the Executive Committees and as an advisor to all main areas of the companies. Involved in all the processes of value creation, not only reporting. Perhaps is a desire? I trust it will become reality.



Carlos Arango Arconada





# About EASP and local Sustainability Managers networks



The **European Association for Sustainability Professionals** connects networks across Europe. It currently brings together nearly 4,000 European sustainability professionals. Its aim is to share best practice between countries and to help make CSR / ESG a lever for transformation and value creation for European companies. Members are :



Founded in 2000, VNU e.V. (Association for European Sustainability and Eco-Management Professionals) is a network that connects experts and users in environmental protection and sustainability management. Members collaborate to exchange knowledge, share experiences, and contribute to method development. The association targets companies, auditors, and interested parties, including university staff and lawyers, and engages in committee work on standardized management systems like ISO and EU (EMAS) as well as sustainability reporting.



Founded in 2006, Sustainability Makers is an Italian association of professionals who specialise in planning and implementing sustainability strategies and projects, in business enterprises and other organisations: it's a third-sector organisation which role is to qualify and enhance the skills and specialisation of these professionals through training and networking activities, studies and research, conferences, workshops and webinars.



Founded in 2007, the C3D is an association under the French law of 1901 that brings together 373 directors of sustainable development and CSR from private and public companies and organisations in France. The C3D is the leading European association of CSR directors. Its raison d'être is to support the transformation of business models in a socially responsible way, while respecting the 9 planetary limits.



Founded in 2013, DIRSE is the Spanish Association of Sustainability Directors (ESG). It works to promote, defense and recognize people who, within all types of entities, develop this specific function, contributing to improve their influence to create value in their organisations. With this objective of re-inforcing the function, the Association centers its activity in 4 work axis: Learning, Resources, Networking and Advocacy, with special focus in creating tools that facilitate the work of these professionals. Nowadays, DIRSE has more than 900 individual associates and more than 100 corporate partners in all the Spanish regions represented in Territorial Delegations.







Founded in 2014, the ICRS acts as the professional body for those working in CRS. It has around 1,700 individual members – mostly based in the UK – and 50 organisational members drawn from a variety of sectors. The Institute seeks to build the skills and knowledge of its members and to increase understanding of CRS among its other stakeholders. It has developed its own competency framework. It also provides a wide range of training and briefing materials together with online and face-to-face events where participants can access information, share their experiences and build supportive networks.



Hellenic Association of Sustainability Professionals is the Greek network for Chief Sustainability Officers.



Responsible Business Forum Serbia is a network of socially responsible companies that contribute to the development of the community, stimulating the development of corporate social responsibility and the establishment of firm and lasting socially responsible practices in the business sector. Its mission is to encourage development of CSR and the establishment of durable CSR practices in the business sector.



Founded in 2005, CSR Turkey is an independent NGO formed by the efforts from academics, businesses and other civil society organisations. CSR Turkey aims to promote CSR notion within international standards in Turkey and to increase CSR awareness which already exists with foundations, associations and guild culture in Turkey.



Established in 2024, the Association of Professionals in Sustainability is a new NGO that unites professionals and companies in Romania with a shared vision for a sustainable future. We are a dynamic and dedicated community committed to promoting ecological, economic, and social sustainability across all aspects of society. Our mission is to facilitate collaboration, foster innovation, and support professional development in sustainability. We specifically target two categories: professionals passionate about ESG (Environmental, Social, and Governance) principles and companies seeking information and practical approaches to transform into sustainable businesses.





# *If you are a CSR Manager and want to join a local network, here is your contact*



**France**, Marlène Morin-Lallemand, C3D,  
[contact@cddd.fr](mailto:contact@cddd.fr)



**Spain**, Carlos Arango Arconada, DIRSE,  
[dqdirse@dirse.es](mailto:dqdirse@dirse.es)



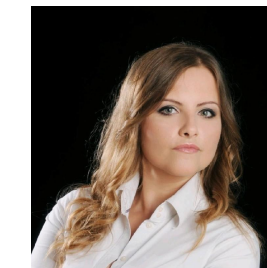
**Romania**, Iulia Lascau, APS,  
[iulia.lascau@ap-sustainability.ro](mailto:iulia.lascau@ap-sustainability.ro)



**Italy**, Maria-Cristina Zaccone,  
Sustainability Makers,  
[segreteria@sustainability-makers.it](mailto:segreteria@sustainability-makers.it)



**UK**, Paul Burke, ICRS,  
[info@icrs.info](mailto:info@icrs.info)



**Serbia**, Milica Mišković, RBFS,  
[milica@smartkolektiv.org](mailto:milica@smartkolektiv.org)



**Germany**, Birgit Gieren, VNU,  
[b.gieren@vnu-ev.de](mailto:b.gieren@vnu-ev.de)



**Greece**, Panagiotis Valantassis, HEASP,  
[pvalantassis@aegeanexperts.gr](mailto:pvalantassis@aegeanexperts.gr)



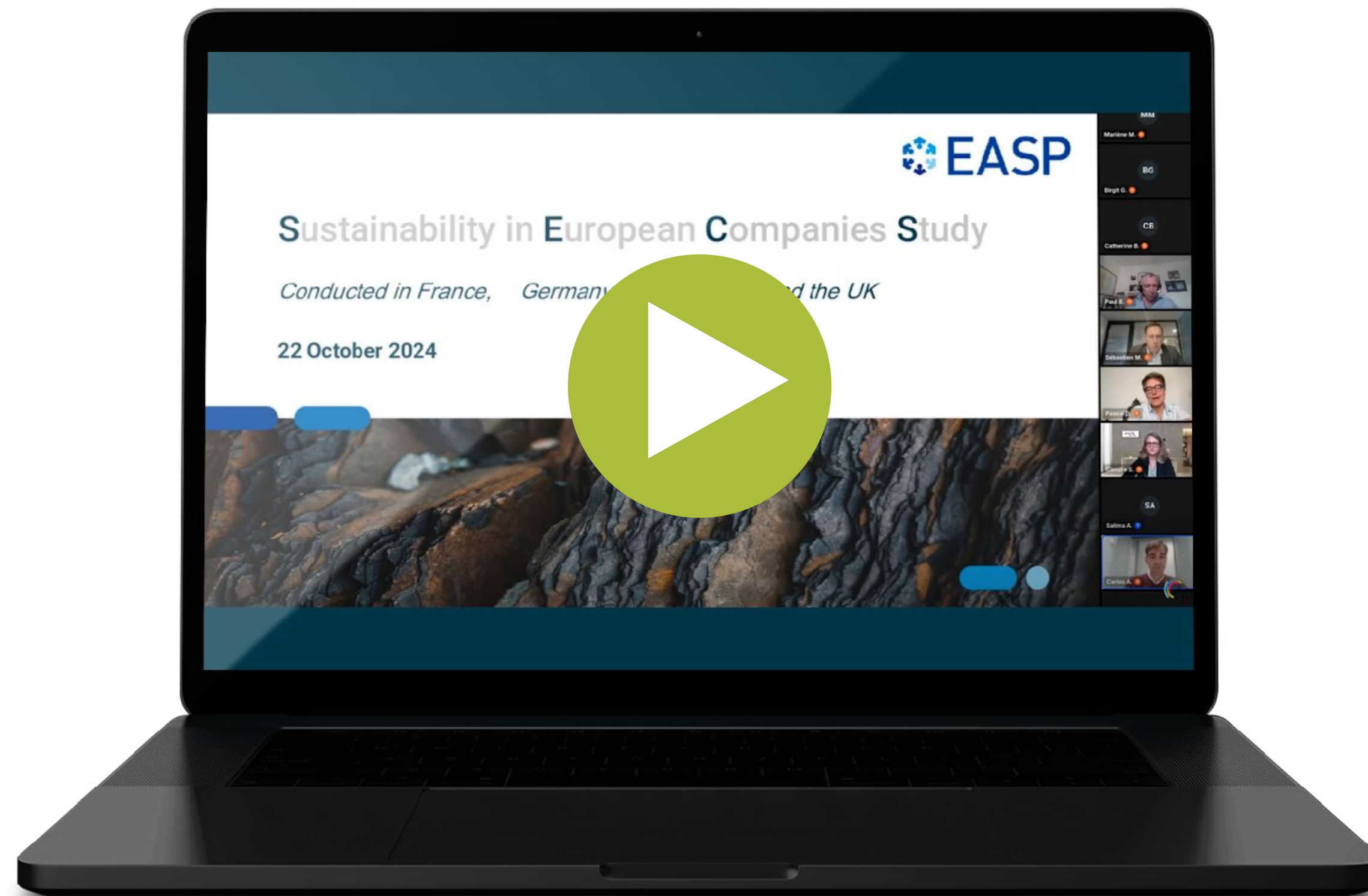
**Turkey**, Serdar Dinler, CSR Turkey,  
[serdar.dinler@csrturkey.org](mailto:serdar.dinler@csrturkey.org)

If your country network wants to join, write to [mmorin@greenflex.com](mailto:mmorin@greenflex.com)





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