



Impact of proposed Omnibus changes on EU legislation



Specific Topic	Existing	Omnibus Proposal
CSRD		
Scope of CSRD (firm size)	Applies to companies meeting two of three criteria: 250+ employees, €25m balance sheet, or €50m turnover. Also includes listed SMEs meeting lower thresholds, with an opt-out until 2028.	Limited to companies with >1,000 employees and either €50M turnover or €25M balance sheet total must report. Listed SMEs removed from scope. 80% fewer companies affected.
Double materiality	Required (both financial and impact materiality) as basis to define reporting scope.	These requirements remain the same.
CSRD number of companies covered	Greater than 50,000 companies are covered.	Less than 10,000 companies are covered.
CSRD third-country undertaking threshold	The threshold is set at EUR 150m turnover.	The threshold is increased to EUR 450m turnover.
CSRD value chain reporting	Companies are required to collect data from suppliers where feasible and reasonable.	No longer required to gather data from non-CSRD companies. Restrictions apply to data requests for SMEs linked to the voluntary SME reporting standard.
CSRD assurance	Limited assurance is currently required, with plans to transition to reasonable assurance.	Limited assurance remains; however, the requirement for reasonable assurance has been removed.
CSRD reporting deadlines	Specific deadlines set for initial disclosures and audits.	Potential delays of up to two years for companies in waves 2 and 3.
European Sustainability Reporting Standards (ESRS)	Adopted in July 2023 with extensive qualitative and quantitative disclosures.	ESRS to be simplified and number of disclosures reduced, focus on quantitative data.
Sector-specific standards	EFRAG tasked to develop sector-specific standards (the CSRD requires the EU commission to propose such standards).	The requirement to provide sector-specific requirements is dropped.
CSRD climate transition plan harmonisation	CSRD and CSDDD had separate requirements for climate transition plans and disclosures.	The Omnibus proposal removes the obligation for companies to implement their climate transition plans. However, retains the requirement to adopt a plan aimed at limiting global warming to 1.5°C. Climate-related disclosures still remain under ESRS. CSRD standards are still being developed by EFRAG.

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CSDDD		
CSDDD implementation timeline	This will be entering into force in 2027.	This is postponed to 2028.
CSDDD value chain in scope	Assessment included direct and indirect suppliers, the so called “chain of activities” (excluding parts of the downstream value chain).	Besides own operations and its subsidiaries, only direct suppliers (tier 1) need to be assessed unless there is credible information indicating a risk.
CSDDD adverse impact assessment and monitoring	Annual monitoring required for “chain of activities” as part of due diligence obligations.	Reduced frequency of obligatory periodic assessments and monitoring of business partners every 5 years, with ad hoc assessments where necessary. However, companies must ensure that measures remain adequate and effective, which requires ongoing due diligence.
CSDDD contract termination	Companies must terminate contracts with non-compliant suppliers.	This is no longer a requirement.
CSDDD civil liability	Companies could be held civilly liable for non-compliance.	The proposal removes the introduction of new civil liability provisions. However, existing national laws on civil liability remain unchanged, meaning companies may still face liability if a Member State’s legislation provides for it.
CSDDD financial sector coverage	Due diligence obligations for financial institutions were under consideration.	These requirements have been removed.
CSDDD penalties	Maximum penalties set at no less than 5% of global turnover.	The EC will provide guidance to Member States on determining penalty levels.
CSRD climate transition plan harmonisation	CSRD and CSDDD had separate requirements for climate transition plans, reporting standards, and climate-related disclosures, leading to inconsistencies and increased administrative burden. Member states could impose stricter requirements in certain areas.	The Omnibus proposal removes the obligation to “put into effect” a climate transition plan under CSDDD. However, companies must still adopt a transition plan, which includes outlining both planned and implemented actions for climate change mitigation. Climate-related disclosures remain under ESRS. This moves toward greater harmonisation across EU member states but limits national flexibility.
CBAM		
CBAM importer threshold	This currently applies to all importers meeting defined thresholds.	Introduces a new 50-ton annual exemption, eliminating CBAM obligations for 90% of importers.
CBAM full implementation date	This is currently set for 2026.	Delayed to 2027, annual deadline for making CBAM declarations and surrendering certificates would be moved from 31 May to 31 August.
CBAM product coverage	This covers iron, steel, cement, fertilizers, aluminum, hydrogen, and electricity.	No expansion at this stage; however, it may be extended in 2026 to include ETS sectors, indirect emissions, and transformed goods.
Emissions tracking process	This requires detailed emissions tracking.	Processes have been streamlined to reduce compliance complexity.