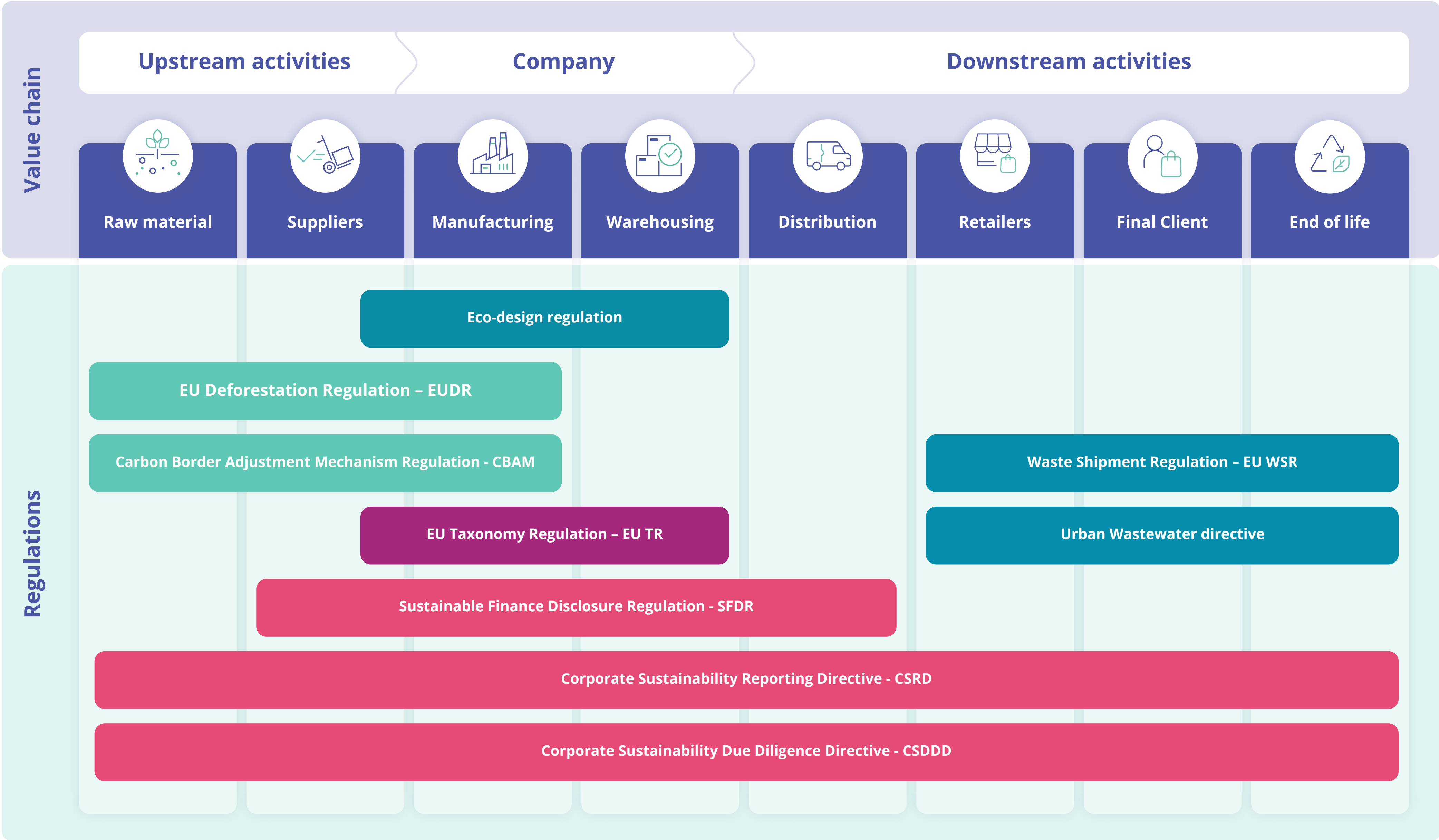
Key milestones in sustainability regulation: **What to Expect in 2025 and Beyond**

Key Regulations Affecting Value Chain Management



* **SFDR** is a regulation that applies to the Financial Market participants and require reporting on portfolio companies on sustainability performance.

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Regulatory Timeline: Key Dates and Applications

2024

CBAM Transitional Phase

CSDDD Transposition

- **CSDDD** enters into force June
- **EU WSR** enters into force on May 20th
- **ESMA** guidelines on funds names using ESG or sustainability related terms applicable.

2025

- **EU TR** alignment disclosure
- **CSRD** reporting : Wave 1
- **EU DR** compliance (postponed 1 year)
- **EU WSR** Deadline for non-OECD countries to request to continue to receive waste

2026

- **EU TR** alignment disclosure
- **CSRD** Reporting : Wave 2
- **CBAM** EU importers of goods must register with national authorities to purchase CBAM certificates, declare the embedded emissions in their imports.
- **EU WSR** November, Plastic waste export to non-OECD countries banned.

2027

- **EU TR** alignment disclosure
- **CSRD** Reporting : Wave 3
- **EU WSR** New rules on exports start to apply

2028

- **EU TR** alignment disclosure
- **CSDDD** reporting : Wave 1
- **CSRD** Reporting : Non-EU parent company with significant business in EU/EEA
- **CBAM** Declaration

2029

- **CSDDD** reporting : Wave 2
- **CBAM** declaration

2030

- **CSDDD** reporting : Wave 3
- **CBAM** declaration

*** CSRD Phase in approach**

Wave 1 : EU Companies already subject to the NFRD, including large organizations publicly listed in the EU
Wave 2 : All large undertakings and groups
Wave 3 : EU listed, Small and Medium EU/EEA Enterprise (SMEs)
Wave 4 : Non-EU Parent company with significant Business in the EU/EEA

**** CSDDD Phase in approach :**

Wave 1 : UE companies with >5.000 employees and 1500 M annual TO.
Wave 2 : UE companies with >3.000 employees and 900 M annual TO.
Wave 3 : UE companies with >1.000 employees and 450 M annual TO.

2025: A Year of Regulatory Implementation

Q1	Q2	Q3	Q4

SFDR Review

Q1

- **European Commission** : Legislative proposal targeting enhanced competitiveness for European firms while reducing regulatory burden
- **CSRD reporting** : Undertakings previously subject to NFRD report under ESRS
- **EU TR alignment disclosure** : Non financial undertakings disclose KPIs on Taxonomy alignment under TR Disclosures DA
- **EU TR** : Proposal from Platform on Sustainable Finance to simplify the application and widen the scope of application of the EU TR
- **European Commission**: Proposal for **Omnibus regulations** aims to streamline and enhance compliance across various sectors, covering the **EU TR**, the **CSRD**, and the **CS3D**, facilitating a cohesive regulatory framework for sustainability and transparency in the EU

Q2

- **SFDR** Level I Review ?
- **SFDR PAI** disclosures under the template of the annex I of the SFDR regulation

Q3

- **SFDR** ESAs report on voluntary disclosures under SFDR
- **CBAM** Importers will need to start declaring embedded emissions in their imports and preparing to purchase CBAM certificates based on their import volumes.
- **ESAP ESMA** publish its final report on proposals for amendments to the Regulatory Technical Standards (RTS) related to the European Single Access Point

Q4

- **CBAM** Importers will evaluate the effectiveness of their carbon pricing strategies and ensure that they are prepared for compliance with the CBAM requirements as they become fully operational.

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See our website for more information:

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