# BC ESG • PROFESSIONAL DESK REFERENCE

CSRD Post-Omnibus Scope Quick Card: Thresholds, Exemptions & Scope Map

**RAPID FIELD CARD • FREE DIRECT DOWNLOAD**
Current version — Oct 31, 2026. Update history: https://bcesg.org/eu-csrd-esrs-compliance-roadmap-2026-omnibus/

## • REGULATORY FOUNDATION: THE POST-OMNIBUS REPORTING SCOPE

The EU Corporate Sustainability Reporting Directive (CSRD) mandates sustainability disclosures aligned with European Sustainability Reporting Standards (ESRS) grounded in double materiality. The **January 2026 Omnibus Directive** (and February 2026 Omnibus I simplification package) substantially narrowed mandatory applicability, reducing the in-scope population to roughly **85–90% of original estimates** (~15,000–17,000 entities globally vs. ~20,000+ originally projected; further narrowing to ~5,000 entities under the full 1,000-employee / €450M package).

## CSRD SCOPE DECISION MATRIX: PRE-OMNIBUS VS. POST-OMNIBUS STATUS

STATUTORY SCOPE TEST

| Company Category | Original CSRD Scope (Pre-Omnibus) | Post-Omnibus Scope (2026 Rules) | Action / Status |
|---|---|---|---|
| **Large Listed Companies** | All large EU-listed companies (€250M+ revenue OR 500+ employees; or >250 employees + €40M assets / €50M turnover). | **€750M+ revenue OR 500+ employees AND 2 of 3 criteria** (simplified in 2026 status to >1,000 employees & >€450M net turnover). | MANDATORY ACTIVE<br>Wave 1 reporting continues. |
| **Mid-Cap Listed Companies** | 250+ employees OR €50M+ revenue; mandatory ESRS reporting without opt-out. | **Opt-out provision available; delayed timeline** (Wave 2/3 moved to 2028 for FY2027; ≤1,000 employees exempt). | OPT-OUT / DELAYED<br>Delay to 2028. |
| **Small Listed Companies (SMEs)** | Originally covered with simplified standards; voluntary opt-out to 2028. | **Exemption confirmed** (phase-in timeline extends to 2030; mandatory SME reporting mandate formally removed). | EXEMPT TO 2030<br>Mandate removed. |
| **Large Private Companies** | All large private EU entities meeting standard 2-of-3 size criteria. | **Narrowed thresholds; phase-in timeline extends to 2030** (many private groups relieved from early waves). | PHASE-IN TO 2030<br>Evaluate thresholds. |
| **Non-EU Companies (Third-Country)** | >€150M EU-generated revenue + EU branch (>€40M) or subsidiary. | **Clarified & stringent nexus test:** €150M+ EU revenue threshold (and >€450M EU turnover + branch >€50M / large sub). | NEXUS TEST<br>Report 2029 for FY2028. |

## MACRO IMPACT: 15,000–17,000 ENTITIES GLOBALLY RETAINED

POPULATION METRICS

### Key Relief & Deferrals:

- **Mid-Caps:** Many mid-cap listed companies now hold formal opt-out options or delayed filing deadlines to 2028.
- **Private Entities:** Large private companies face narrowed thresholds with phase-in extending to 2030.
- **SME Deferral:** SME disclosure requirements (if covered) are formally delayed to 2030 with mandatory mandates scrapped.
- **Standard Burden:** Revised ESRS data points cut by ~60–61%, voluntary points removed, sector standards scrapped.

### Core Retained Obligations:

- **Double Materiality:** Mandatory foundation — impact materiality + financial materiality remain strictly in force.
- **ESRS Topical Disclosures:** Must report across all material environmental, social, and governance standards.
- **Independent Assurance:** Mandatory limited assurance from Year 1; statutory auditor or independent provider.
- **Digital Tagging & Integration:** Machine-readable inline XBRL tagging inside the management report.

**REGULATORY SANCTIONS:** Missing CSRD deadlines triggers national competent authority (financial regulator) enforcement, statutory fines, disclosure suspensions, and commercial disqualification in EU capital markets.

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CSRD Compliance Roadmap: Phased Timeline & Double Materiality Core

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## CSRD APPLICABILITY & REPORTING PHASES (POST-OMNIBUS TIMELINE)

FILING WAVES

| Reporting Phase | Applicable Entities (Post-Omnibus Criteria) | First Reporting Year | Publication Year |
|---|---|---|---|
| **Phase 1 (Large Listed)** | €750M+ revenue + 2 of 3 criteria; 500+ employees (original NFRD scope). | **2024 Data** | **2025** (Initial disclosures active; continue FY24-26) |
| **Phase 2 (Mid-Cap Listed)** | €250M+ revenue / €50M net income OR 500+ employees. | **2025 Data** | **2026** (Opt-out available; Wave 2/3 moved to 2028) |
| **Phase 3 (SME Listed)** | Listed SMEs; opt-in initially. | **2028 Data** | **2029** (Mandatory delayed / exempt to 2030) |
| **Phase 4 (Private / Non-EU)** | Large private companies; Non-EU groups with EU operations (>€150M EU revenue). | **2025–2026 Data** | **2026–2027** (Non-EU parent groups 2029 for FY2028) |

## THE 4-STEP POST-OMNIBUS APPLICABILITY TEST

DECISION PROTOCOL

**STEP 1: LISTING STATUS**
Is the entity listed on an EU regulated market? If large (€750M+ / 500+ emp), Phase 1 applies immediately. If mid-cap, check opt-out eligibility.

**STEP 2: SIZE CRITERIA**
Evaluate 2-of-3 criteria: Headcount (>500 / >1,000), Balance Sheet (>€25M / >€40M), Net Turnover (>€50M / >€450M / >€750M).

**STEP 3: PRIVATE PHASE-IN**
If large private EU company not listed, check whether thresholds fall under narrowed criteria; phase-in timeline extends to 2030.

**STEP 4: NON-EU NEXUS**
Does non-EU parent generate >€150M EU revenue (or >€450M) with an EU branch >€50M or large EU sub? Reports from 2029 for FY2028.

## DOUBLE MATERIALITY FOUNDATION & 4-PILLAR DISCLOSURE STRUCTURE

ESRS ARCHITECTURE

**Double Materiality Assessment:**

- **Financial Materiality (Outside-In):** Sustainability matters that generate financial risks or opportunities impacting corporate financial performance, cash flows, and investor decision-making.
- **Impact Materiality (Inside-Out):** Company's actual or potential positive and negative impacts on the environment and society across short, medium, and long-term horizons.
- **Threshold Rule:** A topic is material if it meets *either* financial or impact materiality criteria.

**Four Mandatory Disclosure Pillars (Per Topic):**

- **1. Governance:** Board/committee oversight, ESG competency, management accountability, executive compensation linkage.
- **2. Strategy:** Business model resilience, material risks & opportunities, CapEx allocation, climate scenario pathways (1.5°C, 2°C, 4°C+).
- **3. Risk Management:** Processes to identify, assess, manage, and monitor sustainability impacts and financial dependencies.
- **4. Metrics & Targets:** Granular KPIs, SBTi-aligned reduction goals, historical baselines, and comparative benchmarks.

## ASSURANCE REGIME: 2025 LIMITED → 2026 INDEPENDENCE → 2028 REASONABLE

ASSURANCE ROADMAP

**2025 (FY2024 DATA)**
Limited assurance by statutory financial auditor OR independent assurance service provider.

**2026 ONWARDS**
Assurance providers must be fully independent (cannot be primary financial auditor in key member states).

**2028–2030 HORIZON**
Transition to Reasonable Assurance for specified disclosure areas (Commission standard adoption roadmap).