

**CSRD Year 2 Experience – Survey Findings**  
**European Contact Group**  
May 2026

**I. Introduction**

The Corporate Sustainability Reporting Directive (CSRD) entered into force in January 2023, under which 2026 is the second year of reporting for Wave 1 companies. The European Contact Group, which represents the six largest international professional services networks in Europe (BDO, Deloitte, EY, Grant Thornton, KPMG and PwC), conducted a **survey among sustainability assurance teams across its six networks** to gather insights into the sustainability reporting and assurance experience under Year 2 of the CSRD. These findings complemented the discussions of **the 4<sup>th</sup> CSRD Practice Forum in Brussels**, an event jointly organized by the European Contact Group and Accountancy Europe. While the survey results do not present statistically representative evidence (see section II), they provide initial insights which can contribute to the overall understanding of the Year 2 experience for both preparers and assurance providers. Overall, the results depict that Year 2 reporting and assurance show signs of maturation which improved readiness and smoother processes, although it is not yet settled due to some persistent challenges.

**II. Research methodology & limitations**

The survey elicited responses from sustainability assurance teams using a combination of structured multiple-choice items and open-ended qualitative questions. Responses were aggregated and analyzed on an anonymized basis. Participants represented auditors from the assurance teams of the six ECG networks, with variation in representation both across EU Member States and the number of responses per network. Responses were received from teams in 16 countries, with the **largest share of responses originating from France, the Netherlands, and Germany**. Given the limited sample size and uneven distribution of respondents, the findings are not statistically generalizable nor conclusive; however, they offer preliminary, exploratory insights that contribute to a broader understanding of the Year 2 experience.

**III. Survey findings**

Based on the survey, most respondents characterized Year 2 as a **smoother experience**. Auditors broadly agree that companies have generally been better prepared, with reporting and assurance processes less disruptive than in the first year (Appendix, figure 1). Such improvements could point to learning effects and rolling forward Year 1 work, refining and updating processes rather than rebuilding them entirely. On the **double materiality assessment (DMA)**, it was noted that the documentation and structure have generally improved. A majority of auditors observed that the Year 2 DMA built off Year 1 processes, rather than becoming a full redesign (Appendix, figure 2). Many respondents also observed better timing and planning of the DMA, with materiality conclusions available earlier in the reporting cycle, allowing more effective risk assessment. There were also observations that the **quality of IRO definitions improved**, with more precise wording, overlapping IROs combined, and a clearer separation between impacts, risks, opportunities and mitigation actions.

**Despite these improvements, maturity remains uneven and ongoing interpretation uncertainty is observed.** A persistent challenge cited was **data quality, availability, and consistency**, especially where information needs to be collected across multiple entities, jurisdictions, or the value chain. It was observed that **internal processes and controls over sustainability data remain immature compared to financial reporting** (Appendix, figure 3).

Many respondents also highlighted **ongoing challenges with the DMA**, including keeping the DMA process sufficiently robust, documenting judgements, and managing updates. Areas of DMA that require application of significant judgement (e.g., threshold-setting, treatment of gross vs. net impacts) remain challenging. From the perspective of assurance providers, companies still face interpretation uncertainty around GHG emissions and climate-related disclosures. The EU Taxonomy application is also still inconsistently interpreted. **Forward-looking and qualitative information was also noted to remain as difficult to interpret and assure.** This was echoed during the CSRD Practice Forum, where some preparers spoke about the challenge of speculating about long-term financial impacts of issues like climate change. At the same time, other preparers during the Practice Forum also validated the value of anticipated financial effects as enabling forward-looking strategic thinking. Despite the challenges, practice is likely to improve over time.

Respondents who disagreed (albeit the minority) that the assurance process had become smoother cited persistent challenges with the companies they were assuring. These challenges include weak data quality, manual and fragmented processes, documentation gaps, and **persistent complexity of certain topics which require a high degree of judgement, such as Scope 3 GHG emissions, EU Taxonomy metrics, and certain social metrics.** A recurring call was made for clearer guidance on Scope 3 GHG emissions. They also highlighted ongoing regulatory uncertainty, resource-intensive assurance methodologies, and limited improvement in client preparedness or expectations, all of which constrained efficiency gains between Year 1 and Year 2.

**Changes in estimates** were frequently observed in environmental metrics, particularly GHG emissions (Scope 3), energy consumption, and resource flows. **Corrections of errors** mainly related to data completeness and calculation issues. While these changes and corrections were observed, they were not viewed as pervasive. These responses reflect that these changes are part of a maturing reporting process, rather than an indication of declining reporting quality.

Additionally, most respondents indicated no emphasis-of-matter (EoM) paragraphs were included in their Year 2 assurance opinions; where they were included, they often related to the DMA.

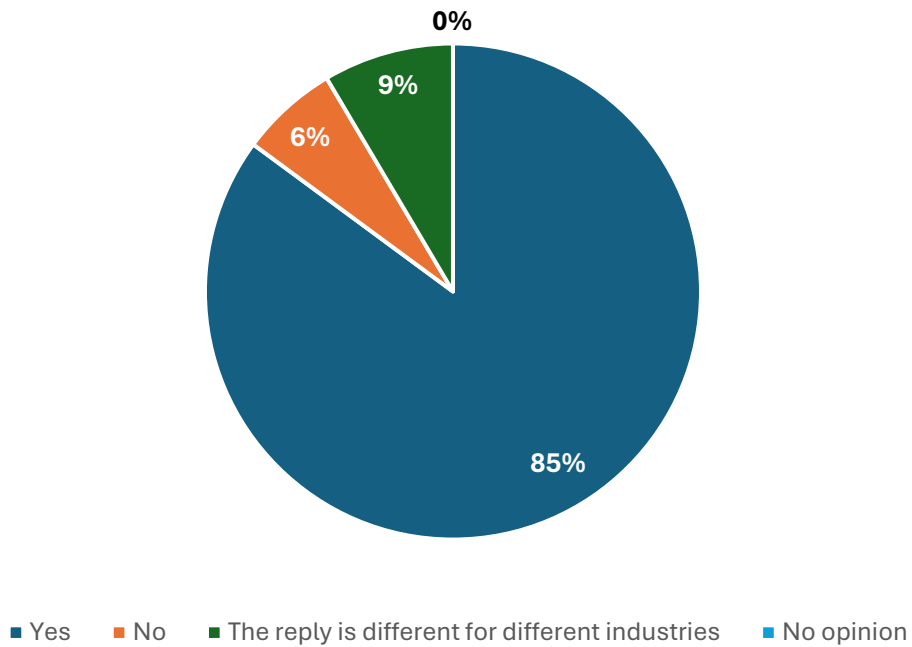
#### **IV. Conclusion**

While the survey results indicate signs of improvements in the maturation of the reporting and assurance experience, **Year 2 of CSRD reporting should not be seen as a “stable end state,” but rather as a transition year from initial implementation to gradual maturation.** With the regulatory environment still evolving (such as through the recent adoption of the revised CSRD (“Omnibus I” package), the forthcoming revision of the ESRS, and the upcoming limited assurance standard), CSRD implementation remains an ongoing journey for all stakeholders.

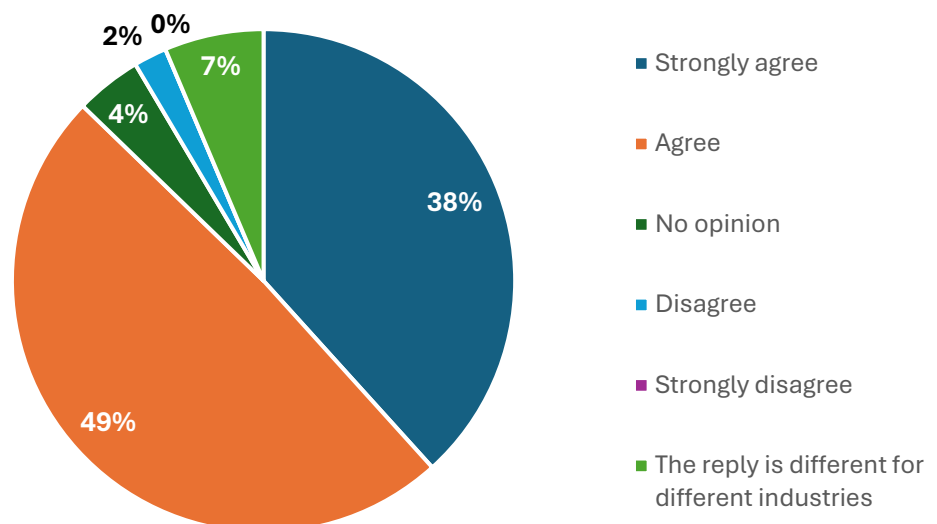
## Appendix

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**Figure 1:** *In your view, does the CSRD reporting experience seem to be a smoother process for companies, compared to Year 1?*



**Figure 2:** *To what extent do you agree with the following statement: The DMA exercise was an update of the Year 1 exercise, rather than a complete redesign from scratch.*



**Figure 3: How would you assess the quality of internal processes and controls over sustainability data in Year 2?**

