

Figure 2 / Comparison of Omnibus Proposal and original CSRD requirements

Thresholds	Current legislation	Timeline	Omnibus proposal	Timeline
Phase 1	Listed + 500 employees	FY 2024 onwards	Listed + 1000 employees	FY 2024 onwards
Phase 2	Two out of the following three conditions: - 50 million euros in turnover; - 25 million euros in assets; - 250 employees	FY 2025 onwards	1000 employees + either of the following two conditions: - 50 million euros in turnover; - 25 million euros in assets	FY 2027 onwards
Phase 3	Listed SME's	FY 2026 onwards	Not in scope	FY 2028 onwards
Phase 4	Global filing for third country HQ which meets the following conditions: - 150 million euros turnover on a consolidated basis in the EU AND either 1. large subsidiary in the EU (1,000 employees + remaining criteria); OR 2. 40 million euros turnover from a branch in EU	FY 2028 onwards	Global filing for third country HQ which meets the following conditions: - 450 million euros turnover on a consolidated basis in the EU AND either 1. large subsidiary in the EU (1,000 employees + remaining criteria); OR 2. 50 million euros turnover from a branch in EU	FY 2028 onwards
Assurance	Limited until 2027 Reasonable from 2028		Targeted assurance guidelines for limited assurance to be released by 2026. No possibility to transition from limited to reasonable assurance.	
Double Materiality Assessment	Applicable for all 'in-scope' entities		No change	
Data points	1140		< 1140 (possible 25% reduction)	
Topical Standards	ESRS		Revised ESRS to be adopted at the earliest, maximum in next 6 months	
Sectorial Standards	Mandatory standards to be introduced		No sectorial standards	
Value chain cap	All value chain partners but limited to informed per LSME where applicable		Limited to: 1. All information for value chain partners who themselves qualify under CSRD reporting basis revised scope (i.e > 1000 employees); or 2. information per VSME for other value chain partners or commonly shared information in the sector	
New category: small mid-caps	N/A		Out-of-scope undertakings (undertakings with up to 1000 employees): not subject to mandatory reporting requirements, may use the proportionate voluntary standard to be adopted by the Commission as a delegated act (VSME).	

Note: Does not include impact on companies in financial services sector

Source: https://ec.europa.eu/commission/presscorner/detail/da/qanda_25_615

Disclaimer: It may also be noted that since Omnibus proposal introduces some Level-1 changes, those changes will go through the full legislative process which typically takes 3-6 months, though a fast track process has been recommended by the Commission.