
Van Doorne

Omnibus: simplified CSRD and CS3D are now official

The EU Omnibus I package is now published in the Official Journal of the European Union (Directive (EU) 2026/470). It amends the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CS3D) by simplifying reporting requirements and limiting the trickle-down effect of obligations on smaller undertakings. Here's what you need to know about the key changes to the CSRD and CS3D

Van Doorne

2 March 2026

CSRD

- The CSRD's scope of undertakings subject to sustainability requirements has been significantly narrowed. The following categories of undertakings are now in scope:

Category	Thresholds	Reporting date*
EU undertakings and non-EU issuers individually or in a group	> €450m net turnover AND ≥ 1,000 employees	Reporting in 2028 (for the FY starting on or after 1 January 2027)
Non-EU ultimate parent undertakings	>€450m turnover in the EU for the last two consecutive FYs AND an EU subsidiary/branch with >€200m turnover in preceding FY	Reporting in 2029 (for the FY starting on or after 1 January 2028)

*Please note that "Wave one" undertakings falling out of scope must continue reporting until FY 2027, unless and until their member state opts to exempt them from reporting obligations as regards FYs beginning between 1 January 2025 and 31 December 2026.

Key changes:

- **New financial holding exemption** — EU parent undertakings that are financial holding undertakings which do not involve themselves in the management of their subsidiaries, and whose subsidiaries' business models and operations are independent of one another, may choose not to include sustainability information in their consolidated management report. In addition, EU subsidiaries and branches of non-EU financial holding undertakings meeting the same conditions may decide not to publish and make accessible the group sustainability report.
- **Value chain information cap** — undertakings with less than 1,000 employees have the right to decline to provide information beyond the voluntary reporting standards for SMEs (the VSME standard). Where a reporting undertaking requests information exceeding those standards from another undertaking, it must inform the latter, so-called “protected undertaking” which information exceeds the voluntary standard and of its right to refuse.
- **New information exemptions** — covering commercially prejudicial disclosures, trade secrets, classified information and privacy-sensitive data. A 3-year transitional relief applies where value chain information is unavailable.
- **Sector-specific reporting standards scrapped** — replaced by optional Commission guidance on applying the European Sustainability Reporting Standards (ESRS) to specific sectors.

CS3D

- The CS3D's scope has been scaled back. The following categories of undertakings are now in scope, with an application date of 26 July 2029:

Category		Thresholds	Application date
EU	EU undertakings individually or in a group	>€1.5bn net turnover worldwide AND > 5,000 employees	26 July 2029
	EU undertakings with franchising or licensing agreement in the EU in return for royalties with independent third parties	>€75m royalties AND >€275m net turnover worldwide	
Non-EU	Non-EU undertakings individually or as an ultimate parent undertaking	>€1.5bn net turnover in the EU	
	Non-EU undertakings with franchising or licensing agreement in the EU in return for royalties with independent third parties	>€75m royalties AND >€275m net turnover in the EU	

Key changes:

- **Removal of climate transition plan obligation** — though member states may still adopt national requirements on this point and the CSRD disclosure obligation (if a plan exists) remains. A separate publication by our ESG team exploring this topic in more detail will follow shortly.
- **Due diligence** — the risk-based approach to due diligence specified in the current version of CS3D remains, with clarifications on the information to be used for these purposes, as follows:
 - undertakings are required to conduct a scoping exercise, based solely on reasonably available information, to identify general areas across their chain of activities (including business partners) where adverse impacts are most likely to occur and to be most severe; and
 - following the scoping exercise, undertakings are required to conduct an in-depth assessment in the areas where adverse impacts were identified to be most likely to occur and most severe.
 - as a general rule, in-depth assessments at the level of business partners are limited to direct business partners (tier 1). Companies are required to look beyond direct business partners only where they have plausible information suggesting adverse impacts at the level of an indirect business partner.
- **Limiting possible information requests to business partners** — in the context of the in-depth assessment, undertakings may only request information from business partners to the extent that such information is necessary. With respect to business partners with fewer than 5,000 employees, information requests are only permitted where the relevant information cannot reasonably be obtained by other means.
- **Resources** — for the purposes of identifying and assessing adverse impacts, undertakings are entitled to make use of appropriate resources, including independent reports, digital solutions, and industry and multi-stakeholder initiatives — thereby avoiding duplicative requests to business partners.
- **Suspension replaces termination** — the obligation to terminate business relationships as a last resort has been softened to a requirement to suspend until the adverse impact is addressed.
- **Penalties and civil liability** — fines capped at 3% of worldwide net turnover, with the European Commission to issue guidelines in this regard. The harmonised EU civil liability regime has been removed; however, national tort law continues to apply and affected parties may still bring claims under national law.

Timing

18 March 2026

Entry into force: 18 March 2026

19 March 2027

Deadline for the EU member states to transpose CSRD-related amendments into national law: 19 March 2027

26 July 2028

Deadline for EU member states to transpose CS3D-related amendments into national law: 26 July 2028 — one year before in-scope companies are required to comply (26 July 2029)

Do you have questions about the applicability of this Omnibus Directive, introducing a simplified CSRD or CS3D to your organisation, the obligations arising from these changes, or the steps you can take now to prepare? Please do not hesitate to get in touch — we would be happy to assist.

ESG Team



Lisette Bieleveld
Lawyer | Partner
bieleveld@vandoorne.com
[+31 \(0\)6 21 89 25 75](tel:+31621892575)



Femke Beelen
Lawyer | Senior Associate
beelen@vandoorne.com
[+31 \(0\)6 11 14 47 17](tel:+31611144717)



Tom Nijenhuis
Lawyer | Senior Associate
nijenhuist@vandoorne.com
[+31 \(0\)6 51 01 99 85](tel:+31651019985)



●
+31 20 6789 123
info@vandoorne.com

The Netherlands

Amstelveenseweg 638-710
1081 JJ Amsterdam

United Kingdom

100 Bishopsgate
EC2N 4AG Londen

Van Doorne is already working for tomorrow today.

Van Doorne