



# Sustainability pills

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## **ESG: Europe simplifies sustainability reporting, Omnibus I approved with new CSRD thresholds and focus on SMEs**

Regulatory updates in the **ESG** field continue, with a key step for European companies: the **European Parliament** has approved the **Omnibus I simplification**, a proposal that amends the Corporate Sustainability Reporting Directive (**CSRD**), introducing more selective criteria and a more proportionate approach.

### **CSRD: who is required to report on sustainability**

The CSRD directive, implemented in Italy by **Legislative Decree 254/2016**, as amended by **Legislative Decree 125/2024** and subsequent additions, provides that the sustainability reporting obligation **will take effect from 2028**, with reference to the 2027 financial year, for European companies that meet **both** of the following requirements:

- **more than 1,000 employees** (annual average)
- **net turnover exceeding €450 million**

The obligation also extends to **branches and subsidiaries** which, although belonging to non-EU groups, generate a **turnover in the European Union exceeding € 200 million**.

This revision significantly reduces the number of companies subject to mandatory reporting, with the aim of **lightening the administrative burden** without compromising transparency on environmental, social and governance issues.

### **SMEs and companies with fewer than 1,000 employees: the role of VSME**

One of the main changes introduced concerns companies with **fewer than 1,000 employees**, which are **no longer subject to direct CSRD reporting obligations**. For companies with fewer than 250 employees, voluntary adoption of the **VSME standard** is recommended as a simplified and proportionate tool for responding to ESG information requests, particularly in the context of supply chain relationships with companies subject to CSRD.

The VSME is a strategic tool for:

- responding in a structured manner to ESG information requests from customers, partners and industry groups
- avoiding fragmented and particularly detailed requests from obligated companies



- improving competitive position within value chains.

For companies with **between 250 and 1,000 employees**, although excluded from the CSRD obligation, the adoption of more structured reporting frameworks, such as the **GRI Standards**, possibly integrated with the VSME principles, remains relevant in order to ensure the consistency, comparability and credibility of ESG information disclosed to the market. Pending the national transposition of Omnibus I, companies are therefore called upon to operate in a **transitional regulatory environment**, in which ESG reporting is taking on an increasingly strategic role: not only as a compliance tool, but also as a lever for dialogue with the market, risk management and value creation in the medium to long term.



### ***New EU rules against deforestation: what will change from 30 December 2026***

Regulation (EU) 2023/1115 (European Union Deforestation Regulation, EUDR) was adopted to address the problem of deforestation and forest degradation linked to the production of certain raw materials. In particular, the products covered by the EUDR are **cocoa, coffee, palm oil, rubber, soy, timber and cattle**.

The Regulation allows their import, placing on the Union market and export only if they are **deforestation-free and produced in accordance with the relevant legislation of the country of production**, as well as following a **due diligence process**.

The administrative burdens mainly affect those identified by the Regulation as **“operators”**, natural or legal persons who, in the course of a commercial activity, place the products concerned on the market or export them and who, according to the EUDR, must subject them to *due diligence* and submit the relevant declaration (*due diligence statement*, DDS). Operators are distinguished from **“micro or small primary operators”**, natural persons, micro-enterprises or small enterprises required to submit a simplified one-off declaration.

A further category is that of **“traders”**, persons in the supply chain who make the products concerned available on the market. The amendments made in December 2025 introduced **“downstream operators”**, i.e. entities that transform a product already subject to *due diligence* into another product falling within the scope of the legislation, or that export it. Traders and downstream operators are subject to the same obligations, namely the **collection of information** on



primary operators and the DDS associated with the products they intend to place or make available on the market or export.

With the recent amendment, traders and downstream operators - intervening at a secondary stage of the value chain - have been relieved of the responsibility of submitting the DDS, which now lies exclusively with those who first place the products covered by the EUDR on the market. In addition, printed books, newspapers, images and other printed products have been excluded from the scope of the Regulation.

Large operators and traders will have to apply the provisions of the Regulation from **30 December 2026**, while small operators will have until **30 June 2027**.



***PPWR: the new European turning point on packaging and waste***

**Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024** on packaging and packaging waste is now official, introducing a profound rethinking of the way packaging is designed, used and managed throughout its entire life cycle.

With the PPWR, the European Union is adopting rules that are directly applicable in all Member States, overcoming regulatory fragmentation and strengthening the objective of waste prevention and transition to circular economy models.

A first key element concerns **design requirements**: packaging must be designed from the outset to be recyclable and, where technically and economically feasible, also reusable. Design thus becomes a regulatory tool aimed at reducing waste and improving the efficiency of collection and recycling systems.

The Regulation also addresses the **reduction of unnecessary packaging** by introducing specific limits on the use of single-use packaging for certain categories of products, with the aim of combating excessive and unnecessary packaging and promoting more sustainable solutions.

Of particular importance are the **binding reuse targets** set for certain strategic sectors such as logistics, beverages and takeaways. In these areas, the reuse of packaging becomes a structural requirement, with direct impacts on the organisation of supply chains and business models.

The PPWR also introduces **mandatory minimum recycled content quotas**,



especially for plastic packaging, strengthening the demand for secondary raw materials and contributing to the development of a more robust and stable recycling market.

Another pillar of the Regulation is **the harmonised labelling** of packaging, designed to facilitate separate collection and ensure proper waste management by consumers, reducing errors and inefficiencies in recovery systems.

Finally, **Extended Producer Responsibility (EPR)** is strengthened, expanding the obligations on businesses in terms of financing, management and traceability of packaging waste, with a more consistent and uniform approach at European level.

Regulation (EU) 2025/40 makes packaging a strategic lever for sustainability, requiring companies not only to comply with new obligations, but also to rethink the entire life cycle of their products in terms of ESG.



### ***EU Taxonomy: simplifications coming in 2026***

The new Regulation updates and simplifies the EU Taxonomy (Regulation (EU) 2020/852), intervening on three key delegated acts:

- Delegated Regulation (EU) 2021/2178 (disclosure)
- Delegated Regulation (EU) 2021/2139 (climate objectives)
- Delegated Regulation (EU) 2023/2486 (non-climate environmental objectives).

The aim is to reduce the complexity of implementation while improving the quality and comparability of ESG information.

### **The main changes, which come into force on 28 January 2026 and apply from 1 January 2026, are as follows:**

- **Simplification of reporting requirements**, with a reduction in redundant information
- **Revision of economic indicators** (revenues, CapEx and OpEx) to enhance consistency and comparability
- **Introduction of a 10% materiality threshold:** non-financial companies may exclude from the assessment activities that do not exceed 10% of the denominator of the individual indicator
- **Reorganisation of reporting formats**, with simplification of technical annexes and reduction of overlaps
- **Refinement of DNSH criteria**, particularly on pollution prevention and control.



# The department

The Andersen team offers **integrated consulting services** to help clients understand the possibilities associated with sustainable innovation, seeking a **combination of ethics and business practice** within the current regulatory framework.

The department's **cross-cutting skills** enable business operations to be carried out in a responsible manner, thanks to assessments and measurements of the organisation, policies, expected and generated impacts, and stakeholder representation.

The result is the definition of new business models that focus on people and the environment with a view to innovation.



## Key Contacts



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