

Der VSME-Standard als Ansatz für eine praxisgerechte Nachhaltigkeitsberichterstattung von KMU?

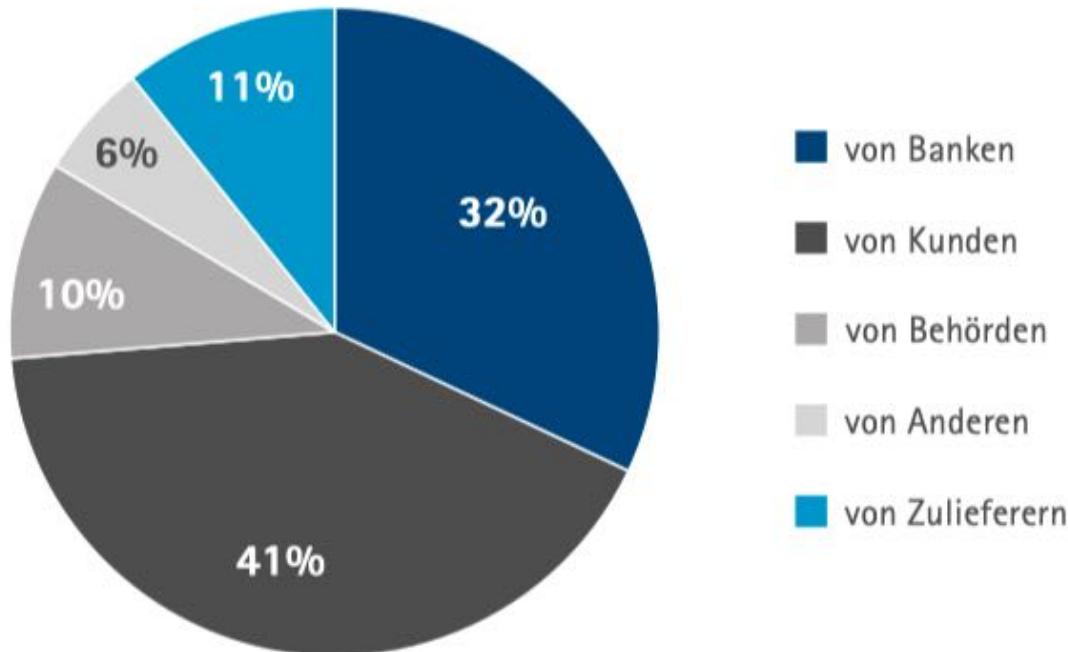
Industrie- und Handelskammer Nordschwarzwald in Pforzheim

Jan Greitens (Westfälische Hochschule)

26. Februar 2025

Trickle-Down Effekt: Indirekte Berichtspflichten für KMU

Bekommen Sie von Geschäftspartnern Anfragen zu Nachhaltigkeitsinformationen über Ihr Unternehmen?



Sustainable Finance im Mittelstand (2023)

<https://www.dihk.de/resource/blob/103344/d3fdf4c29d3078ac74981184cf245039/unternehmensentwicklung-dihk-broschu-re-sustainable-finance-mittelstand-data.pdf>

Hintergründe zum VSME

Ziele

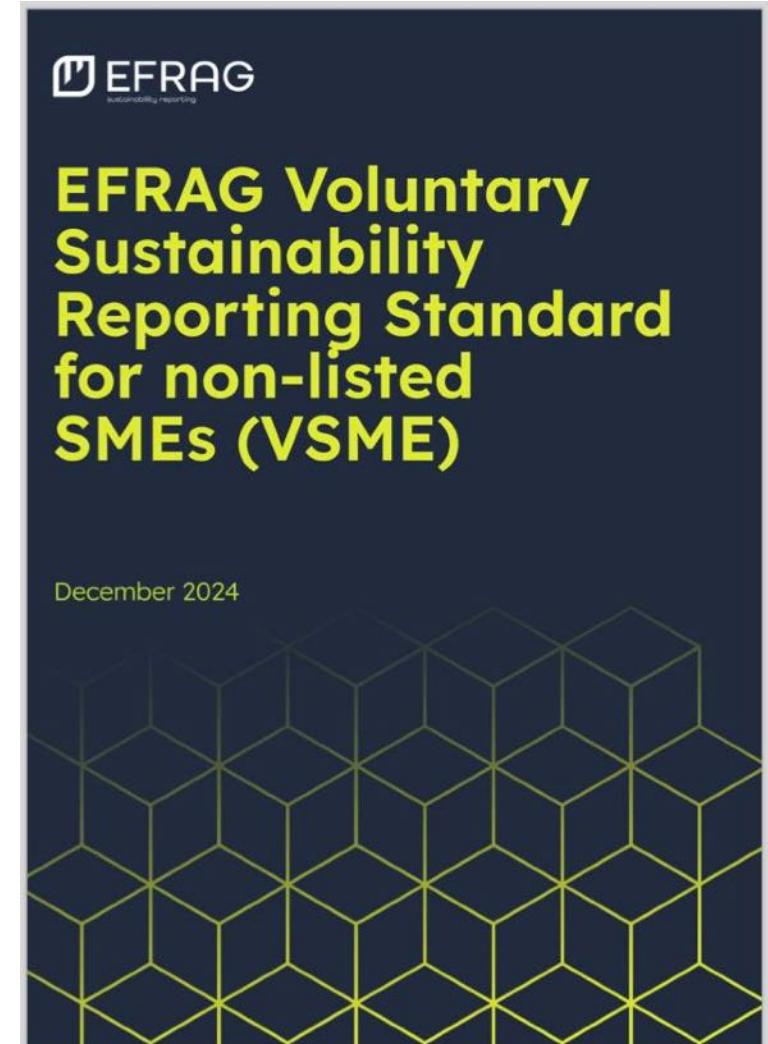
- Standardisierung der Anforderungen aus dem Trickle Down-Effekt
- Erleichterung des Zugangs zu nachhaltigen Finanzierungen
- Unterstützung des Managements für die Transformation

Struktur

- Basics-Module: Bericht für Kleinstunternehmen und Mindestanforderung für größere KMU
- Comprehensive Module: weitere Datenpunkte, die voraussichtlich von Banken, Investoren und Unternehmen in der Wertschöpfungskette zusätzlich zum Basis-Modul angefragt werden

Zeitplan

- Finaler Entwurf der EFRAG liegt vor.
- Baldige Empfehlung durch die EU-Kommission und später (vermutlich mit Änderungen) als Delegierter Rechtsakt.



Prinzipien des VSME

Doppelte Materialität / Wesentlichkeit:

- Outside-In: wie Umwelt- und soziale Fragen die finanzielle Lage des Unternehmens beeinflussen (Zielgruppe Investoren)
- Inside-Out: positive oder negative Auswirkungen auf Menschen oder die Umwelt (Zielgruppe Stakeholder)

⇒ Praktische Relevanz im VSME? Keine Wesentlichkeitsanalyse gefordert.

Strukturelle Abgrenzung:

- Konsolidiert für Gruppen
- Verweise auf andere Veröffentlichungen möglich
- Konsistenz zur finanziellen Berichterstattung (z.B. Geschäftsjahr)

VSME-Datenpunkte

Umwelt
Soziales
Governance

BASIC MODULE

- **B1** – Basis for preparation
- **B2** – Practices, policies and future initiatives for transitioning towards a more sustainable economy (YES/ NO dropdown menu)
- **B3** – Energy and greenhouse gas emissions
- **B4** – Pollution of air, water and soil
- **B5** – Biodiversity
- **B6** – Water
- **B7** – Resource Use, circular economy and waste management
- **B8** – Workforce – General characteristics
- **B9** – Workforce – Health and safety
- **B10** – Workforce – Remuneration, collective bargaining and training.
- **B11** – Convictions and fines for corruption and bribery



COMPREHENSIVE MODULE

- **C1** – Strategy: Business Model and Sustainability – Related Initiatives
- **C2** – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy (Semi-narrative - continuation of B2)
- **C3** – GHG reduction and climate transition
- **C4** – Climate risks
- **C5** – Additional (general) workforce characteristics
- **C6** – Additional own workforce metric - Human rights policies and processes
- **C7** – Incidents related to severe human rights cases
- **C8** – Revenues from certain sectors and exclusion from EU reference benchmarks.
- **C9** – Gender diversity ratio in governance body

Basic-Module – General Information

General Information	Paragraph	Disclosure	Description
B1 - Basis for Preparation	24	Always to be reported on	24. The undertaking shall disclose: (a) which of the following options it has selected: i. OPTION A: Basic Module (only); or ii. OPTION B: Basic Module and Comprehensive Module; (b) if the undertaking has omitted a disclosure as it is deemed classified or sensitive information (see paragraph 19), the undertaking shall indicate the disclosure that has omitted. (c) whether the sustainability report has been prepared on an individual basis (i.e. the report is limited to the undertaking's information only) or on a consolidated basis (i.e. the report includes information about the undertaking and its subsidiaries); (d) in case of a consolidated sustainability report, the list of the subsidiaries, including their registered address4, covered in the report; and (e) the following information: i. the undertaking's legal form; ii. NACE sector classification code(s); iii. size of the balance sheet (in Euro); iv. turnover (in Euro); v. number of employees in headcount or full-time equivalents; vi. country of primary operations and location of significant asset(s); and vii. geolocation of sites owned, leased or managed.
	25	If applicable	25. If the undertaking has obtained any sustainability-related certification or label, it shall provide a brief description of those (including, where relevant, the issuers of the certification or label, date and rating score).
B2 - Practices, policies and future initiatives for transitioning towards a more sustainable economy	26	If applicable	26. If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, it shall state so. The undertaking shall state whether it has: (a) practices. Practices in this context may include, for instance, efforts to reduce the undertaking's water and electricity consumption, to reduce GHG emissions or to prevent pollution, and initiatives to improve product safety as well as current initiatives to improve working conditions and equal treatment in the workplace, sustainability training for the undertaking's workforce and partnerships related to sustainability projects; (b) policies on sustainability issues, whether they are publicly available, and any separate environmental, social or governance policies for addressing sustainability issues; (c) any future initiatives or forward-looking plans that are being implemented on sustainability issues; and (d) targets to monitor the implementation of the policies and the progress achieved towards meeting such targets.
	27	If applicable	27. Such practices, policies and future initiatives include what the undertaking does to reduce its negative impacts and to enhance its positive impacts on people and the environment, in order to contribute to a more sustainable economy. Appendix B provides a list of possible sustainability issues that could be covered in this disclosure. The undertaking may use the template found in paragraph 78 to report this information.
	28	If applicable	28. If the undertaking also reports on the Comprehensive module, it shall complement the information provided under B2 with the data points found in C2.

Basic-Module – Environment metrics

B3 - Energy and greenhouse gas emissions	29	Always to be reported, breakdown if available	29. The undertaking shall disclose its total energy consumption in MWh, with a breakdown as per the table below, if it can obtain the necessary information to provide such a breakdown:
	30	Always to be reported on	30. The undertaking shall disclose its estimated gross greenhouse gas (GHG) emissions in tons of CO ₂ equivalent (tCO ₂ req) considering the content of the GHG Protocol Corporate Standard (version 2004), including: (a) the Scope 1 GHG emissions in tCO ₂ req (from owned or controlled sources); and (b) the location-based Scope 2 emissions in tCO ₂ req (i.e. emissions from the generation of purchased energy, such as electricity, heat, steam or cooling).
	31	Always to be reported on	31. The undertaking shall disclose its GHG intensity calculated by dividing gross greenhouse gas (GHG) emissions' disclosed under paragraph 30 by 'turnover (in Euro)' disclosed under paragraph 24(e)(iv)5.
B4 - Pollution of air, water and soil	32	If applicable	32. If the undertaking is already required by law or other national regulations to report to competent authorities its emissions of pollutants, or if it voluntarily reports on them according to an Environmental Management System, it shall disclose the pollutants it emits to air, water and soil in its own operations, with the respective amount for each pollutant. If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.
B5 - Biodiversity	33	If applicable	33. The undertaking shall disclose the number and area (in hectares) of sites that it owns, has leased, or manages in or near a biodiversity sensitive area.
	34	May disclosure	34. The undertaking may disclose metrics related to land-use. (a) total use of land (in hectares); (b) total sealed area; (c) total nature-oriented area on-site; and (d) total nature-oriented area off-site.
B6 - Water	35	Always to be reported on	35. The undertaking shall disclose its total water withdrawal, i.e. the amount of water drawn into the boundaries of the organisation (or facility); in addition, the undertaking shall separately present the amount of water withdrawn at sites located in areas of high water-stress.
	36	If applicable	36. If the undertaking has production processes in place which significantly consume water (e.g. thermal energy processes like drying or power production, production of goods, agricultural irrigation, etc.), it shall disclose its water consumption calculated as the difference between its water withdrawal and water discharge from its production processes.
B7 - Resource use, circular economy and waste management	37	If applicable	37. The undertaking shall disclose whether it applies circular economy principles and, if so, how it applies these principles.
	38 (a)	Always to be reported on	38. The undertaking shall disclose: (a) the total annual generation of waste broken down by type (non-hazardous and hazardous);
	38 (b)	Always to be reported on	(b) the total annual waste diverted to recycling or reuse; and
	38 (c)	If applicable	(c) if the undertaking operates in a sector using significant material flows (for example manufacturing, construction, packaging or others), the annual mass-flow of relevant materials used.

Basic-Module – Social metrics / Governance metrics

B8 - Workforce - General characteristics	39 (a)	Always to be reported on	39. The undertaking shall disclose the number of employees in headcount or full-time equivalent for the following metrics: (a) type of employment contract (temporary or permanent);
	39 (b)	Always to be reported on	(b) gender; and
	39 (c)	If applicable	(c) country of the employment contract, if the undertaking operates in more than one country.
	40	To be reported on when above the threshold	40. If the undertaking employs 50 or more employees, it shall disclose the employee turnover rate for the reporting period.
B9 - Workforce - Health and safety	41	Always to be reported on	41. The undertaking shall disclose the following information regarding its employees'. (a) the number and rate of recordable work-related accidents; and (b) the number of fatalities as a result of work-related injuries and work-related ill health.
B10 - Workforce - Remuneration, collective bargaining and training	42 (a)	Always to be reported on	42. The undertaking shall disclose: (a) whether the employees receive pay that is equal or above applicable minimum wage for the country it reports in, determined directly by the national minimum wage law or through a collective bargaining agreement;
	42 (b)	To be reported on when above the threshold	(b) the percentage gap in pay between its female and male employees. The undertaking may omit this disclosure when its headcount is below 150 employees noting that this threshold will be reduced to 100 employees from 7 June 2031;
	42 (c)	Always to be reported on	(c) the percentage of employees covered by collective bargaining agreements; and
	42 (d)	Always to be reported on	(d) the average number of annual training hours per employee, broken down by gender.
Governance metrics			
B11 - Convictions and fines for corruption and bribery	43	If applicable	43. In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and antibribery laws.

Comprehensive Module - General information

C1 - Strategy: Business Model and Sustainability - Related Initiatives	47 (a)	Always to be reported on	47. Depending on the type of activities carried out by the undertaking, disclosing a quantification of its Scope 3 GHG emissions can be appropriate (see paragraph 10 of this Standard) to yield relevant information on the undertaking's value chain impacts on climate change. (a) a description of significant groups of products and/or services offered;
	47 (b)	Always to be reported on	(b) a description of significant market(s) the undertaking operates in (such as B2B, wholesale, retail, countries);
	47 (c)	Always to be reported on	(c) a description of main business relationships (such as key suppliers, customers distribution channels and consumers); and
	47(d)	If applicable	(d) if the strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements.
C2 - Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	48	If applicable	48. If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, which it has already reported under disclosure B2 in the Basic Module, it shall briefly describe them. The undertaking may use the template found in paragraph 213 for this purpose.
	49	If applicable + may disclose	49. The undertaking may indicate, if any, the most senior level of the undertaking accountable for implementing them.

Comprehensive Module - Environmental Metrics

C3 - GHG reduction targets and climate transition	54	If applicable	54. If the undertaking has established GHG emission reduction targets, it shall disclose its targets in absolute values for Scope 1 and Scope 2 emissions. In line with paragraphs 50 to 53 above and if it has set Scope 3 reduction targets, the undertaking shall also provide targets for significant Scope 3 emissions. In particular, it shall provide: (a) the target year and target year value; (b) the base year and base year value; (c) the units used for targets; (d) the share of Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns; and (e) a list of main actions it seeks to implement to achieve its targets.
	55	If applicable + may disclosure	55. If the undertaking that operates in high climate impact sectors has adopted a transition plan for climate change mitigation, it may provide information about it, including an explanation of how it is contributing to reduce GHG emissions.
	56	If applicable	56. In case the undertaking operates in high-climate impact sectors and does not have a transition plan for climate change mitigation in place, it shall indicate whether and, if so, when it will adopt such a transition plan.
C4 - Climate risks	57	If applicable	57. If the undertaking has identified climate-related hazards and climate-related transition events, creating gross climate-related risks for the undertaking, it shall: (a) briefly describe such climate-related hazards and climate-related transition events; (b) disclose how it has assessed the exposure and sensitivity of its assets, activities and value chain to these hazards and transition events; (c) disclose the time horizons of any climate-related hazards and transition events identified; and (d) disclose whether it has undertaken climate change adaptation actions for any climaterelated hazards and transition events.
	58	May disclosure	58. The undertaking may disclose the potential adverse effects of climate risks that may affect its financial performance or business operations in the short-, medium- or long-term, indicating whether it assesses the risks to be high, medium, low.

Comprehensive Module - Social Metrics

C5- Workforce (General) Additional characteristics	59	May disclosure + threshold included	59. If the undertaking employs 50 or more employees, it may disclose the female-to-male ratio at management level for the reporting period.
	60	May disclosure + threshold included	60. If the undertaking employs 50 or more employees, it may disclose the number of those self-employed without personnel who are working exclusively for the undertaking, and temporary workers provided by undertakings primarily engaged in 'employment activities'.
C6 - Additional own workforce information - Human rights policies and processes	61 (a)	Always to be reported on	61. The undertaking shall disclose an answer to the following questions. Does the undertaking have a code of conduct or human rights policy for its own workforce? (YES/NO)
	61(b)	If applicable	(b) If yes, does this cover: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/NO); iv. discrimination (YES/NO); v. accident prevention (YES/NO); or vi. other? (YES/NO – if yes, specify).
	61(c)	Always to be reported on	(c) Does the undertaking have a complaints-handling mechanism for its own workforce? (YES/ NO)
C7 - Severe negative human rights incidents	62(a)	Always to be reported on	62. The undertaking shall disclose an answer to the following questions: (a) Does the undertaking have confirmed incidents in its own workforce related to: i. child labour (YES/ NO); ii. forced labour (YES/ NO); iii. human trafficking (YES/ NO); iv. discrimination (YES/ NO); or v. other? (YES/NO – if yes, specify).
	62 (b)	If applicable	(b) If yes, the undertaking may describe the actions being taken to address the incidents described above.
	62 (c)	If applicable	(c) Is the undertaking aware of any confirmed incidents involving workers in the value chain, affected communities, consumers and end-users? If yes, specify.

Comprehensive Module - Governance Metrics

C8 - Revenues from certain sectors and exclusion from EU reference benchmarks	63	If applicable	63. If the undertaking is active in one or more of the following sectors, it shall disclose its related revenues in the sector(s): (a) controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); (b) the cultivation and production of tobacco; (c) fossil fuel (coal, oil and gas) sector (i.e. the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, oil and gas; or (d) chemicals production if the undertaking is a manufacturer of pesticides and other agrochemical products.
	64	Always to be reported on	64. The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement as described in paragraph 241 of the guidance.
C9 - Gender diversity ratio in governance body	65	If applicable	65. If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.



Link zur inoffiziellen
Übersetzung der
Entwurfsversion des
VSME von Anfang 2024.

VSME: Value Chain Cap

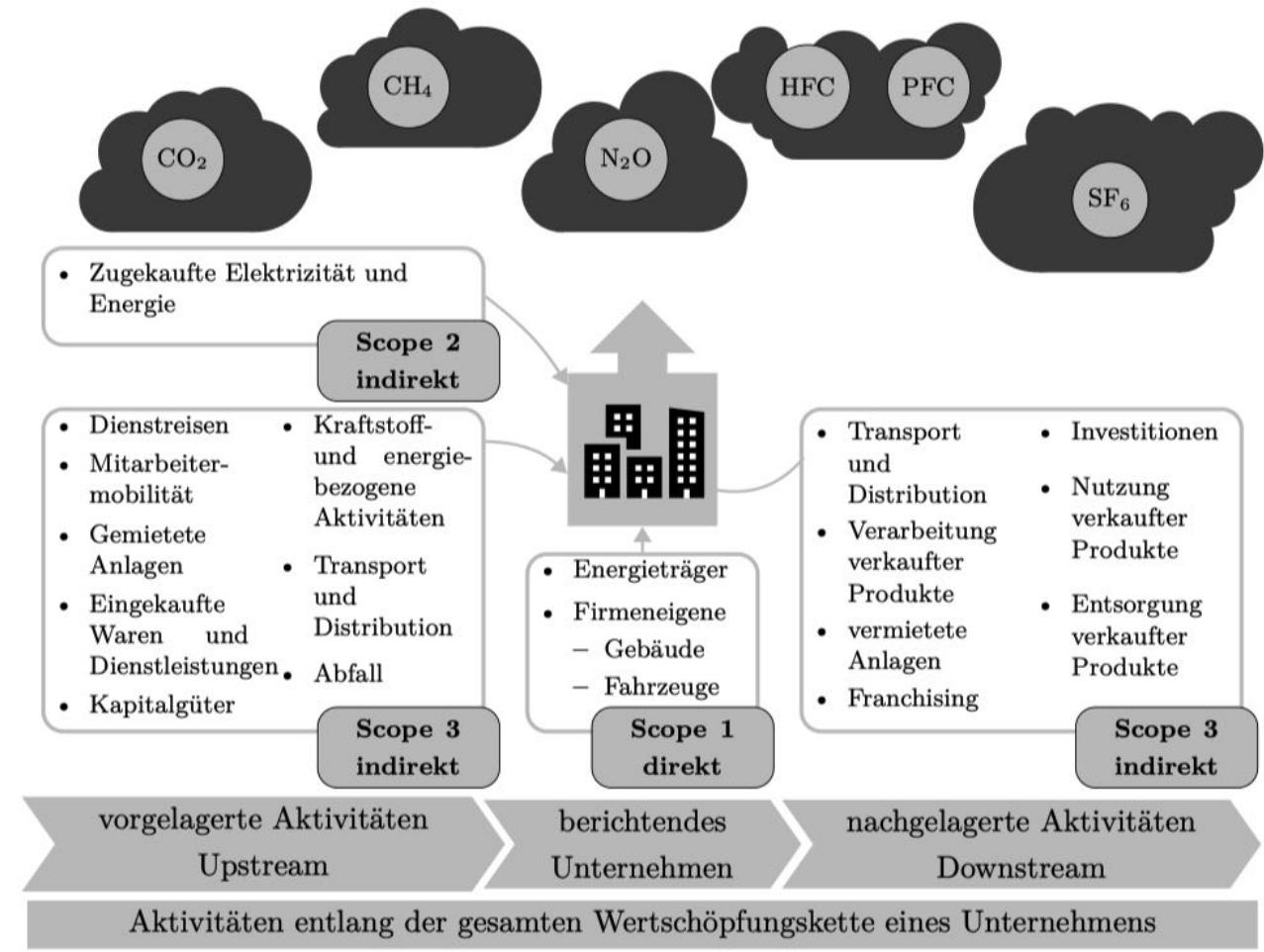
Hauptproblem des VSME: Marktakzeptanz!

- Artikel 29b (4) in der CSRD besagt, dass der Nachhaltigkeitsberichtsstandard für kapitalmarktorientierte KMU (LSME) gesetzlich die Informationen begrenzt, die große Unternehmen von KMU in ihren Wertschöpfungsketten verlangen müssen.
- Es wird daher gehofft, dass der VSME der Marktstandard für Kreditgeber, Investoren und Unternehmen wird, wenn es darum geht, Nachhaltigkeitsdatenanforderungen an KMU zu erfragen.
- Die EU-Kommission möchte im Rahmen der Omnibus-Gesetzgebung (Stand 26.2.2025) den VSME anstelle des LSME zum „Value Chain Cap“ in der CSRD machen. Das Gesetzgebungsverfahren dazu beginnt jetzt.

Ausgewählte Datenpunkte: CO2-Emissionen (B3)

- Die Angabe der Scope 1 und 2-Treibhausgasemissionen wird von allen Unternehmen gefordert.
- Abhängig von der Art der Tätigkeiten (das betrifft insb. Fertigung, Agrar- und Lebensmittelwirtschaft, Bauwesen sowie Verpackungsprozesse) ist auch die Offenlegung von Informationen zu Scope 3-Treibhausgasemissionen angemessen, um relevante Informationen über die Auswirkungen der Wertschöpfungskette des Unternehmens auf den Klimawandel bereitzustellen.
- Wenn das Unternehmen beschließt, diese Kennzahl offenzulegen, sollte es die 15 Typen von Scope-3-Emissionen umfassen, die vom GHG Protocol Corporate Standard beschrieben sind.

Mögliche Tools zur Unterstützung:
<https://www.ecocockpit.de/>



Hannen (2021): Transformationstrategien zum Co2-neutralen Unternehmen, S. 10

Ausgewählte Datenpunkte: Arbeitsunfälle (B9)

- Bei Telearbeit gelten Verletzungen und Erkrankungen als arbeitsbedingt, wenn sie direkt mit der Arbeitsleistung und nicht mit der allgemeinen häuslichen Umgebung zusammenhängen.
- Bei Verletzungen und Erkrankungen während einer Dienstreise gelten diese als arbeitsbedingt, wenn der Mitarbeiter zum Zeitpunkt der Verletzung oder Erkrankung im Interesse des Arbeitgebers tätig war.
- Unfälle, die sich auf dem Arbeitsweg zwischen Wohnort und Arbeitsplatz ereignen, unterliegen den geltenden nationalen Gesetzen, die regeln, ob sie als arbeitsbedingt angesehen werden oder nicht.
- Psychische Erkrankungen gelten als arbeitsbedingt, wenn sie vom betreffenden Mitarbeiter freiwillig gemeldet wurden und eine Bewertung durch einen zugelassenen Gesundheitsdienstleister vorliegt, die bestätigt, dass die Erkrankung tatsächlich arbeitsbedingt ist.
- Gesundheitsprobleme, die durch Rauchen, Drogen- und Alkoholmissbrauch, Bewegungsmangel, ungesunde Ernährung sowie arbeitsunabhängige psychosoziale Faktoren entstehen, werden nicht als arbeitsbedingt betrachtet.

Kennzahl: Anzahl der arbeitsbedingten Unfälle pro 100 Vollzeitbeschäftigte

(Annahme: Vollzeitbeschäftigte arbeitet 2.000 Stunden pro Jahr arbeitet oder Nutzung der tatsächlich geleisteten Arbeitsstunden)

$$\frac{\text{Anzahl aller Arbeitsunfälle im Berichtsjahr}}{\text{Summe aller Arbeitstunden aller Mitarbeiter im Berichtsjahr}} * 200.000$$

Beispiel:

Unternehmen A meldete drei arbeitsbedingte Unfälle im Berichtsjahr. Unternehmen A hat 40 Mitarbeiter, die insgesamt 80.000 Stunden (40×2.000) im Jahr gearbeitet haben. Die Rate der arbeitsbedingten Unfälle beträgt: $3/80.000 \times 200.000 = 7,5$.

Ausgewählte Datenpunkte: Transitionspläne

	B2: Haben Sie bestehende Nachhaltigkeitspraktiken/-richtlinien/ zukünftige Initiativen, die sich mit einem der folgenden Nachhaltigkeitsthemen befassen? [JA/NEIN]	C2: Falls Sie in der Offenlegung B2 mit JA auf bestehende Praktiken/ Richtlinien/ zukünftige Initiativen geantwortet haben, beschreiben Sie diese bitte kurz zusammen mit den daraus resultierenden Maßnahmen.	C2: Falls Sie in der Offenlegung B2 mit JA auf zukünftige Initiativen/ Ziele geantwortet haben, geben Sie diese bitte an.	B2: Sind sie öffentlich zugänglich? [JA/NEIN]	B2: Haben die Richtlinien Ziele? [JA/NEIN]	C2: Sie können die höchste Führungsebene im Unternehmen angeben, die für deren Umsetzung verantwortlich ist [falls definiert].
Klimawandel	[JA/NEIN]			[JA/NEIN]	[JA/NEIN]	
Umweltverschmutzung	[JA/NEIN]			[JA/NEIN]	[JA/NEIN]	
Wasser- und Meeresressourcen	[JA/NEIN]			[JA/NEIN]	[JA/NEIN]	
Biodiversität und Ökosysteme	[JA/NEIN]			[JA/NEIN]	[JA/NEIN]	
etc.	[JA/NEIN]			[JA/NEIN]	[JA/NEIN]	

C3: Ziele zur Reduzierung der Treibhausgasemissionen und Klimatransition

- (a) Basisjahr und Basiswert, sowie Zieljahr und den Zielwert für die betrachteten Unternehmenseinheiten
- (b) Scope 1, Scope 2 und, falls offengelegt, Scope 3, auf die sich das Ziel bezieht
- (c) Liste der Hauptmaßnahmen, um die Ziele zu erreichen

Erstellung von Transitionsplänen

Projekt „Vom Transitions- zum Finanzierungsplan:
Orientierungshilfe von DIHK, VÖB und UNK zur
Transitions- und Finanzierungsplanung“

Ziele

- Möglichst praxisnah mit Checklisten und Tipps zur Umsetzung
- Erarbeitet mit nicht-berichtspflichtigen KMU unterschiedlicher Branchen und Vorerfahrung

⇒ Generisches Vorgehen

Link zu den Ergebnissen (PDF-Dateien und Excel):
<https://www.klimaplattform.de/klimaguide/guideinhalte/artikel/vom-transitions-zum-finanzierungsplan>

Kredit Nr. 292

KfW-Energieeffizienzprogramm – Produktionsanlagen/-prozesse

Energiekosten im laufenden Betrieb einsparen

Das Wichtigste in Kürze

- Förderkredit ab 2,86 % ① effektivem Jahreszins
- bis zu 25 Mio. Euro Kreditbetrag
- für Neuinvestitionen und Modernisierungen im In- und Ausland
- für Unternehmen und Freiberufler

Antrag vorbereiten ▾

...

– So funktioniert's

Empfehlung: Planen Sie Ihr Vorhaben mit einem qualifizierten Experten für Energieeffizienz.



So beantragen Sie Ihren KfW-Kredit

1 Antrag vorbereiten mit dem KfW-Förderassistenten

Ihren Kredit beantragen Sie nicht direkt bei der KfW, sondern bei Ihrer Bank ①. Mit dem KfW-Förderassistenten können Sie Ihren Antrag schon jetzt vorbereiten – damit das folgende Bankgespräch schneller zum Ziel führt.

› [KfW-Förderassistent starten](#)

2 Finanzierungspartner finden

Bevor Sie mit den Arbeiten beginnen, sprechen Sie mit einem Finanzierungspartner Ihrer Wahl.

› [Finanzierungspartner finden und Termin anfragen](#)

↳ [Tipps fürs Beratungsgespräch \(PDF, 115 KB, barrierefrei\)](#)

3 Kredit beantragen

Das übernimmt Ihr Finanzierungspartner für Sie.

Transformationsplan

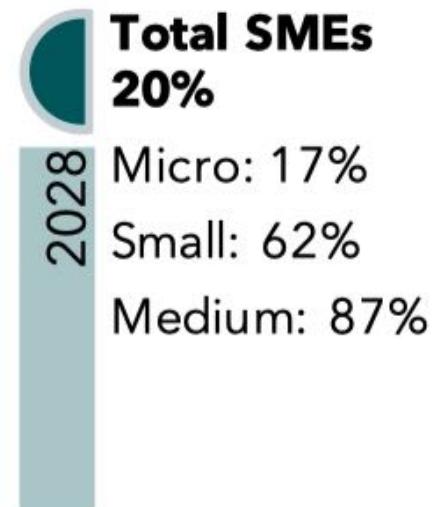
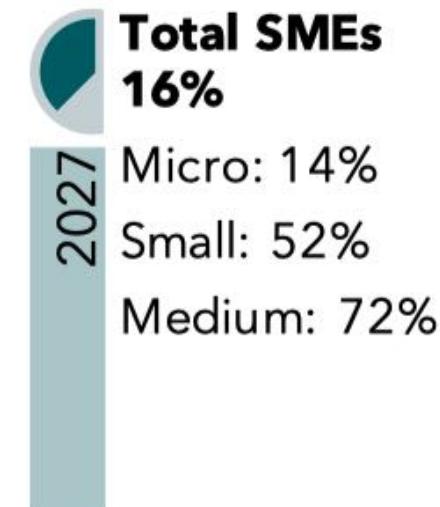
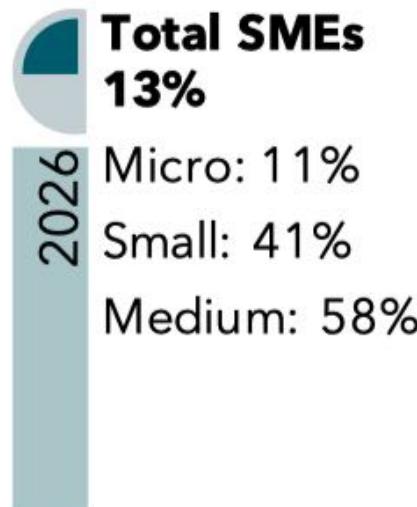
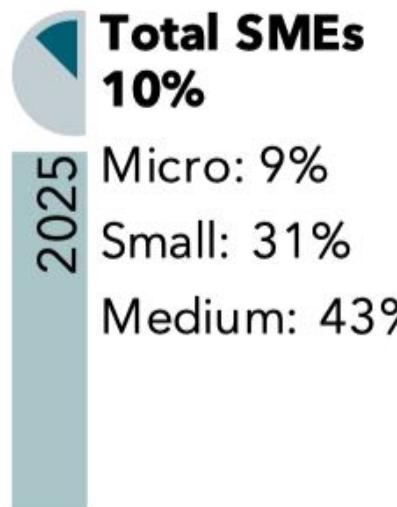
Für die Förderung Ihrer Investitionen benötigen Sie einen Transformationsplan.

Auf der Website des Bundesverbands Öffentlicher Banken Deutschlands (VÖB) finden Sie einen Leitfaden, der Sie Schritt für Schritt bei der Erstellung Ihres Transformationsplans unterstützt.

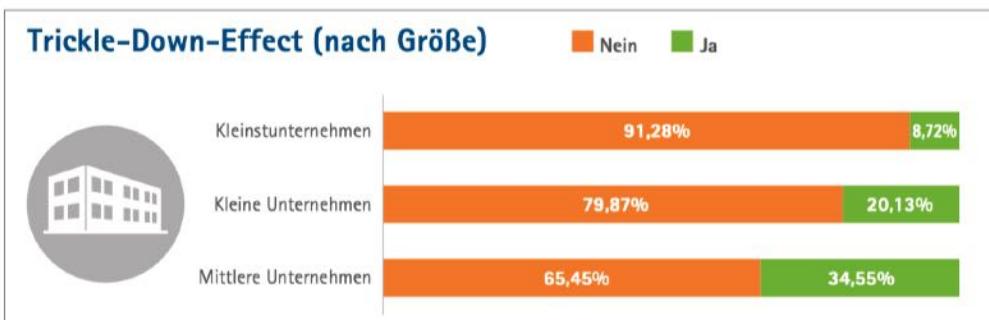
↗ [Zum VÖB](#)

VSME: Schätzung des Anwenderkreises

Figure 4. Potential population of prepares upon request



zum Vergleich 2023:



Europaweit: 20% von 32 Mio. KMU = 6,4 Mio.
=> Vermutlich in der Praxis viele tausende Unternehmen

Table 14. Cost parameters - Basic module

Basic module	Micro & Small (less than 20 employees)		Small (20 employees or more) & Medium	
	First year	Following years	First year	Following years
Accountants	1,000 - 2,000	500 - 1,000	3,000 - 6,000	1,500 - 3,000
Consultants	-	-	5,000 - 10,000	2,500 - 5,000
Platforms	300 - 600	600	1,000 - 3,500	1,000 - 3,500
Internal personnel - Outsourcing	10 days of a clerk, 5 days of a manager 3,000 Range: 1,100 - 7,100	5 days of a clerk, 2.5 days of a manager 1,500 Range: 600 - 3,500	15 days of a clerk, 10 days of a senior professional 4,200 Range: 1,500 - 9,100	7.5 days of a clerk, 5 days of a senior professional 2,100 Range: 800 - 4,600
Internal personnel - In house	-	-	25 days of a clerk, 15 days of a senior professional 6,800 Range: 2,500 - 14,400	12.5 days of a clerk, 7.5 days of a senior professional 3,400 Range: 1,200 - 7,200

Notes. Extreme values removed based on SCM methodology; figures rounded to the hundreds EUR. For internal personnel costs, the ranges are calculated based on the highest (LU) and lowest (BG) salaries; central estimates are calculate based on the average EU salaries for the professional figures identified. Source: targeted consultation, Field Test, Eurostat mean annual earnings by sex, age and occupation

Table 15. Other cost parameters

Other costs and fees	Additional costs	Notes
DRs from the PAT module included in the basic module after the revision	1,000	Includes both internal and external costs; 50% decrease in subsequent years. Only applies to larger preparers, due to the fact that the PAT DRs would not apply to most of micro and small companies.
Comprehensive module - Micro enterprises & Small enterprises with less than 20 employees	5,000	Includes both internal and external costs; 50% decrease in subsequent years.
Comprehensive module - Small enterprises with 20 employees or more and medium enterprises	10,000	

Source: Authors' elaboration on targeted consultation

Kosten-Nutzen-Abschätzung

Schätzung des Nutzens:

- Vorteile in der Finanzierung:
 - Greenium: 5-25 Basispunkte
 - Zugang zu Kredit-/Förderprogrammen
- Partizipation in Wertschöpfungsketten

Plattform des Deutschen Nachhaltigkeitskodex (DNK) für Nachhaltigkeitsberichte

- Für Unternehmen kostenlos, gefördert durch das BMWK.
- Fokus auf Benutzerfreundlichkeit und Verständlichkeit.
- Für CSRD aktuell als Testversion, offizielle Version ab 11. März 2025.
 - Keine technische Unterstützung der Wesentlichkeitsanalyse
- VSME-Tool voraussichtlich ab Sommer 2025 (abhängig von EU-Entwicklung).

The screenshot shows a user interface for reporting obligations. At the top, there are two toggle buttons: 'Unwesentliche Inhalte anzeigen' (deselected) and 'Optionale Inhalte anzeigen' (selected). Below this is a section titled 'Berichterstattungsvorgaben (ESRS 1)' which includes a link to 'Wesentlichkeitsanalyse/Phase-In'. A sidebar on the left lists various sections under 'Allgemeines': DNK 1 Allgemeine Informationen, Grundlagen, Angabepflicht BP-1, DNK 2 Besonderheiten, DNK 3 Zentrale Verantwortung, DNK 4 Anreizsysteme, DNK 5 Management und interne Kontrolle, and DNK 6 Unternehmensstrategie, Geschäftsmodell und Wertschöpfungskette. The main content area is titled 'Angabepflicht BP-1: Allgemeine Grundlagen für die Erstellung der Nachhaltigkeitserklärungen'. It contains a 'Darum geht's' section (ESRS 2 Abs. 3) explaining the general principles of the report, and an 'Aspekt 1' section (ESRS 2 Abs. 5) asking if the declaration was prepared on a consolidated or individual basis, with a dropdown menu showing 'Konsolidiert'.

=> Es gibt auch Angebote von privaten Unternehmen.