PLATING UP PROGRESS **BRIEFING**

POWER AND ACCOUNTABILITY:

The evolving landscape for corporate reporting

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EXECUTIVE SUMMARY

This investor briefing summarises the current reporting landscape and disclosure requirements for the environmental, social, and health impact of food and beverage businesses within the UK, as well as in the European Union (EU) and internationally. We look first at what requirements exist already in the UK or are soon to be implemented, before turning to look at those that already exist or which are incoming from European and international bodies. The latter, although not directly focused on UK operating businesses, are nevertheless still likely to impact UK based food and drink companies with global supply chains and operations as well as influencing the future direction of travel for UK company disclosure requirements.

We find that:

- **There is a very large number of existing, or soon-to-be implemented, corporate reporting regimes across the UK, Europe, and at a global level. Regardless of the decisions the Government makes on UK specific reporting demands, the direction of travel clearly points towards increasing requirements for large food and drink businesses to disclose and report on their progress towards more sustainable business practices.**

- **The majority of reporting requirements are at present focused on human rights and environmental sustainability, with an urgent need for forthcoming sector specific reporting regimes to cover nutrition and health data disclosure for food and beverage businesses.**

- **Of the 15 regimes this briefing looks at, only three are currently mandatory in the UK. The rest are voluntary, or partly mandatory (or expected to be), or could be mandatory once finalised.**

This briefing makes recommendations for investors looking to engage and optimise opportunities from current and future mandatory and voluntary reporting changes in the food and industry. We recommend that there is a need for reporting requirements to be well-designed and interoperable. Reporting requirements ought to be mandatory if they are truly to create a level playing field and encourage greater transparency, accountability, and progress towards more responsible business practices.

This is part of a series of investor briefings; our previous briefings can be found here.

GLOSSARY

CSDDD Corporate Sustainability Due Diligence Directive

CSRD Corporate Sustainability Reporting Directive

ESRS European Sustainability Reporting Standards

FLAG Forest, Land and Agriculture

FDTP Food Data Transparency Partnership

Interoperability The ability of a reporting framework to work effectively with others

ISSB International Sustainability Standards Board

NFRD Non-Financial Reporting Directive

SBTi Science Based Targets initiative

SDR Sustainability Disclosure Requirements

SDS Sustainability Disclosure Standards

SECR Streamlined Energy and Carbon Reporting

SFDR Sustainable Finance Disclosure Regulation

TCFD Taskforce on Climate-related Financial Disclosures

TISFD Taskforce on Inequality and Social-related Financial Disclosures

TNFD Taskforce on Nature-related Financial Disclosures

TPT Transition Plan Taskforce

INTRODUCTION

The food industry shapes our food environment which in turn has a significant impact on our diets and health, our environment, and the lives of those employed by food and beverage companies. Yet our current food system is driving both a health and climate crisis, calling into question food businesses' social license to operate.

The UK food system is responsible for 20% of domestic greenhouse gas (GHG) emissions and what we eat has become the biggest risk factor for preventable disease, taking a toll on our health and placing an unsustainable strain on health services[1–3]. Currently, the UK food system is dominated by a relatively small group of food companies who create and control supply chains and the food environment. Shifting the food system therefore needs action from a range of stakeholders, including the businesses themselves, but also investors and governments who play a crucial role in shifting the incentives and setting the standards in the system in which large businesses operate.

Transparent reporting by food corporations of business operations and employment practices, sourcing standards, and the health profile of the types of food sold, is therefore a key step on the road to understanding where progress needs to be made and in driving better business decisions and efficiencies. It also enables investors, civil society, and government to hold businesses to account. With increasing numbers of businesses setting ambitious Net Zero targets and highlighting their responsible business credentials to customers, accusations of greenwashing, lean washing, and health washing are only likely to grow unless businesses can demonstrate tangible proof of progress towards these commendable goals through accurate and transparent reporting. The impact of mandatory reporting, including on all businesses in the value chain to meet targets, can be seen as an opportunity for businesses to collaborate and identify new business models or financial mechanisms as they transition their current practices.

However, many food businesses are not currently, or consistently, reporting on whether their sales and businesses practices are effectively supporting more equitable access to healthy and sustainable food and better working conditions for employees across their operations and supply chains. This makes it nigh-on impossible to identify which companies are taking action to transition their business practices to deliver better health and environmental outcomes, and those that are not. It also makes it very difficult for investors to align their investments in the food industry with responsible stewardship objectives and to allocate capital accordingly. Given this lack of comparable and reliable data, policymakers are also unable to effectively design policies to accelerate change and create a level playing field for progressive business activity.

Recent years have therefore seen a notable rise in calls for businesses to disclose data on the potential sustainability risks of their operations. Globally, we have seen environmental, social and (to a lesser extent) health reporting rise up the regulatory agenda at both an international and national level. The resultant proliferation of different reporting requirements, frameworks, and benchmarks has led to a new focus on corporate reporting that seems unlikely to go away. A failure to engage or comply with reporting requirements is now an additional risk for businesses and their investors, with fines and legal action threatened for those businesses who do not comply. For businesses and investors this has created a new transitional risk to be considered, in addition to the significant systemic and material risks facing food businesses if they fail to transition their operations and supply chains towards more sustainable business practices[4]. Yet as well as risks there are opportunities to be had in this evolving landscape. For business and investors, disclosure is an opportunity to future-proof their businesses against climate change and regulatory changes, to gain insight into understanding where and how progress needs to be made, and of course in continuing to move forward on the road to better business practices. As the saying goes, nobody wants to own the last coal mine.

MANDATORY VERSUS VOLUNTARY APPROACHES TO REPORTING

Although there are many voluntary benchmarking and reporting initiatives in existence, government-led mandatory reporting requirements have been much more effective in increasing disclosure and in driving progress by businesses on social and environmental issues. Less progress has been seen in areas where there are no mandatory reporting requirements, less significant public pressure, technical challenges relating to lack of data, or lack of agreed approaches to measurement. For example, Plating Up Progress (PUP) analysis shows a number of UK retailers have committed to reporting on the proportion of healthy versus unhealthy food sales in recent years. However, progress in setting targets to increase sales of healthy food and disclosing data remains limited to the retail sector, with minimal commitments from within the Out of Home sector. Inconsistencies in the methodologies used have resulted in discrepancies in the data reported which makes it hard for investors and policymakers to accurately assess where and how progress is being made. Though voluntary approaches may seem attractive given the lower burden they place on businesses, a 2015 study of 161 voluntary schemes in the UK, EU and worldwide found that many schemes were undermined by a lack of industry engagement and the consequent lack of a 'level playing field' between those businesses that genuinely seek to make progress and those that do not[5].

Slow progress through voluntary initiatives can also reinforce low levels of ambition for future progress as targets are kept low to persuade other businesses to join. By contrast, mandatory measures can quickly and effectively drive-up minimum standards across the board amongst businesses that are less engaged, levelling the playing field and avoiding the risk that ambitious commitments are not backed up with action. Government-led mandatory requirements can also help address challenges related to data availability and inconsistent reporting methodologies faced by voluntary schemes because mandatory reporting requirements would improve the Government's ability to collect accurate, consistent and streamlined data. This improves public accountability and provides a strong incentive to spur companies into taking action and has the potential to unlock significant progress[6].

Government-led mandatory reporting requirements have been much more effective in driving progress

Which domains are the main focus area(s) of the reporting regimes covered in this briefing

ENVIRONMENT 14

HUMAN RIGHTS 5

HEALTH 1

METHODOLOGY: THIS BRIEFING'S OVERVIEW OF CURRENT REPORTING REQUIREMENTS

The list of reporting requirements affecting the food and beverage industry is long, so in the interests of keeping this briefing digestible we have chosen to focus our attention on those that have been implemented most recently, are currently in development, and those that are on the horizon. We have also chosen to look at those that deal with more overarching corporate sustainability matters, rather than sub-topic specific issues, except where they are likely to have significant implications across a number of areas of businesses' operations (e.g. deforestation or scope 3 emissions). Finally, we have decided to include reporting requirements at the EU or international level that are likely to impact existing legislation (e.g. the International Sustainability Standards Board [ISSB] standards). The reporting requirements are ordered alphabetically under each section.

BREAKDOWN OF REPORTING REGIMES BY FOCUS AREA, MANDATORY VS VOLUNTARY, AND TO BUSINESSES VS INVESTORS IN THE UK

✗ VOLUNTARY
✓ MANDATORY
✓ EXPECTED TO BECOME MANDATORY

	TARGETING BUSINESSES	TARGETING INVESTORS
ENVIRONMENT	Mandatory: SECR, TCFD Expected to become mandatory: ISSB, TPT, SDS, FDTP, Forest Risk Commodities regulations Voluntary: CSDDD*, CSRD**, EUDR**, TNFD, SBTi	Mandatory: SECR, SDR, TCFD Expected to become mandatory: TPT, SDS Voluntary: CSDDD*, CSRD**, ISSB, SBTi, TNFD, SFDR***
HUMAN RIGHTS	Voluntary: CSDDD*, CSRD**	Mandatory: SDR Voluntary: CSDDD*, CSRD**, SFDR***
HEALTH	Voluntary: FDTP	

TISFD - No information on scope at the moment

**Expected to be mandatory for companies/investors that fall in scope. **Mandatory for entities that fall in scope ***Mandatory for those investors who fall in scope*

PART ONE

THE UK LANDSCAPE FOR CORPORATE REPORTING

The Food Data Transparency Partnership (FDTP)

GOV.UK

HEALTH; ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The FDTP is a partnership between government and industry. It aims to improve the availability, quality and comparability of data in the food supply chain to create a positive change in the food system towards the production and sale of more environmentally sustainable and healthier food and drink[7]. The FDTP was originally committed to in the Government's Food Strategy for England and was set to be implemented by the end of 2023. Although timelines and outcomes from FDTP remain unclear, the landscape could shift rapidly if a general election is announced.

The original proposal made by the government was to establish working groups on three key themes (health, environment and animal welfare) as well as a Data group and an End-Users group consisting of non-industry experts and stakeholders from academia and civil society. Originally, the objective of the FDTP was to increase transparency in the food industry via mandatory data disclosure and reporting by businesses across all three themes. This mandatory approach was a significant step forward as previous voluntary approaches to data disclosure and target setting for the food sector have had only limited success. However, after a number of delays it was decided in early 2023 that reporting for the health metrics/indicators would no longer be mandatory, but instead voluntary. This is in contrast to the eco working group which is developing consistent metrics for scope 3 reporting that are expected to be mandatory.

WHO'S WITHIN SCOPE?

The scope – recommended in the UK's National Food Strategy as being applicable to businesses with more than 250 employees – is still to be officially agreed but several large food businesses have already supported the call for mandatory reporting requirements, including Tesco, Sainsbury's and Greggs[8]. The FDTP health working group minutes from July 2023 state *"It was agreed that whilst emphasis is placed on voluntary reporting by large businesses (exact definition to be decided), small and medium sized enterprises (SMEs) are not precluded from voluntarily reporting and will feature as part of wider stakeholder engagement"*[9].

WHO'S RESPONSIBLE?

The work is being led by the Department for Environment, Food & Rural Affairs (DEFRA) and Department of Health and Social Care (DHSC) with working groups to consult industry and meetings with some civil society actors as part of developing proposals for the metrics:

- The Eco Working Group is developing the detail of proposals to measure and communicate carbon emissions in the food system, and a mandatory methodology for eco-labelling. Progress has not been transparent, with no meeting minutes having been made publicly available on the FDTP's webpage at the time of writing, but the group are expected to produce a roadmap shortly.
- The Health Working Group is considering metrics that support food and drink companies to voluntarily report on the healthiness of their sales in a consistent format. Minutes from the meetings are being published online.

There is also:

- A Data Working Group. This considers the FDTP's technical requirements. It provides advice on the technical feasibility and deliverability of FDTP policy proposals.
- A Design Partnership Group, which focuses on the operational feasibility of FDTP policy proposals for different business models and sectors.

ENFORCEMENT:

As the work of the FDTP is still ongoing, the enforcement details are not yet available.

MANDATORY IN THE UK?

Health metrics: ✗

Environment metrics: ✓ (not currently, but expected to be)

Forest Risk Commodities regulations

GOV.UK

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

Deforestation is strongly linked to land use for agriculture, particularly for the production of commodities such as cattle products (beef and leather), palm oil, soy, coffee and cocoa. The UK's imports of unsustainably produced foods and commodities are therefore a notable driver of global deforestation with an associated impact on biodiversity. During COP28, the UK government announced forthcoming due diligence on forest risk commodities under the Environment Act 2001. This means imports of cattle products (excluding dairy), cocoa, palm oil and soy produced on illegally deforested lands will be prohibited. The regulation will also include derived products such as chocolate and leather[10]. However, it's worth noting that the government's new regulation only covers illegal deforestation and does not include coffee within the list of regulated commodities, unlike the EU regulation which covers all deforestation and does include coffee.

WHO'S WITHIN SCOPE?

The upcoming regulations are applicable to UK businesses with global annual turnover of £50 million. However, those businesses who use 500 tonnes or less of each commodity annually are able to apply for an exception from the regulations. Businesses in scope are required to establish and implement a due diligence system for risk commodities and submit their report annually. They will be given a grace period to prepare for the new requirements before they start their first reporting period.

ENFORCEMENT:

A range of sanctions can be used for non-compliance and the government have set unlimited monetary penalties to deter violations. The new due diligence legislation will be 'laid when parliamentary time allows'. This means the proposed regulation must been laid to the House of Commons and House of Lords (usually twice) as well as the Bills Committee, which could take up to several months, before the regulation comes into effect.

WHO'S RESPONSIBLE?

As the regulation has not been laid to parliament yet, there are no further details on which department(s) will be responsible.

MANDATORY IN THE UK?

✓ (not currently, but if the regulation is approved by parliament, then businesses will be required to undertake due diligence and report annually)

Streamlined Energy and Carbon Reporting (SECR) - The Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018

legislation.gov.uk

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The SECR (UK legislation) is focused on company greenhouse gas emissions and came into effect in 2018. Scope 3 emissions reporting is not yet mandatory although is strongly encouraged. Companies need to provide SECR-accordant information in their Director's Report every financial year, including information on energy use and associated Greenhouse Gas (GHG) emissions, intensity metrics and steps taken to improve energy efficiency[11]. The UK government has stated that it plans to endorse the International Sustainability Standards Board (ISSB) standards in 2024, which cover scope 3 emissions[12].

From 19 October to 14 December 2023 the UK government ran a consultation on the costs, benefits and practicalities of scope 3 emissions reporting to help inform the government's decision on whether to make mandatory the currently voluntary scope 3 emissions reporting in the SECR. The results of the consultation have yet to be published, but the government aims to publish its response to the consultation within 12 weeks of the closing date, so the outcome is expected soon.

WHO'S WITHIN SCOPE?

The SECR is applicable to: companies listed on a public exchange; large unquoted companies; and large Limited Liability Partnerships (LLPs). Under the SECR's definition, companies and LLPs are considered "large" if they meet two or more of the following criteria: a turnover of £36 million or more; a balance sheet of £18 million or more; or 250 employees or more.

ENFORCEMENT:

The Conduct Committee of the Financial Reporting Council (FRC) can issue fines for non-compliance, and Companies House can reject a company's annual accounts if the information provided is deemed to be inadequate. Businesses could be liable for fines (ranging from £150-£7,500) in the form of late deadline penalties when they come to resubmit their annual accounts[11].

WHO'S RESPONSIBLE?

FRC; Companies House.

MANDATORY IN THE UK?

✓

Sustainability Disclosure Requirements (SDR)

FCA FINANCIAL CONDUCT AUTHORITY

ENVIRONMENT; HUMAN RIGHTS

WHAT IS IT AND WHY DOES IT MATTER?

The Financial Conduct Authority (FCA) published its final Sustainability Disclosure Requirements (SDR) rules in November 2023 and firms are, or should be, preparing to comply. The SDR rules are significant because they will require greater scrutiny by investors - which in turn ought to mean greater disclosure against metrics and targets by businesses.

The SDR rules cover five main areas of sustainability claims, which are:

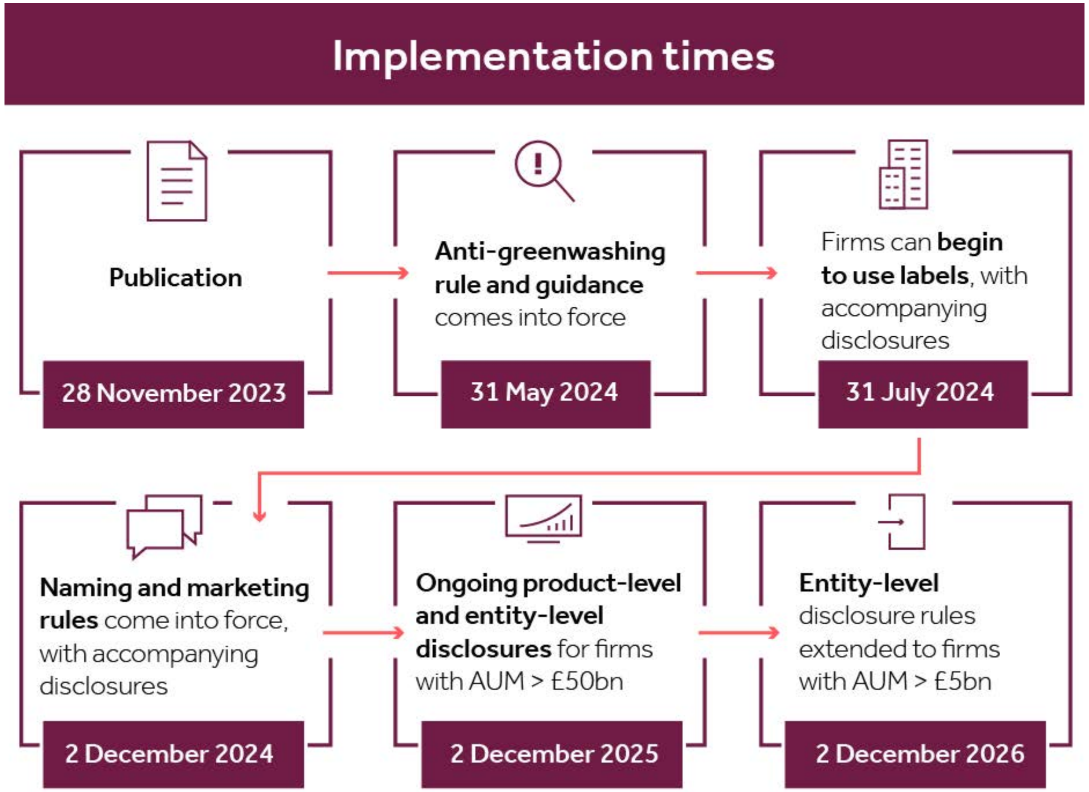
1. the anti-greenwashing rule will apply to all FCA- and Prudential Regulation Authority-authorised firms when they (i) communicate with a UK client in relation to a product or service; or (ii) when they communicate a financial promotion to a person in the UK[13];
2. four new sustainability-related labels to help consumers understand the sustainable investment products market;
3. restrictions on the use of sustainability-related terms in names and marketing materials;
4. four types of sustainability-related disclosures; and
5. new rules that will apply to distributors of investment products to retail investors, including a notice on overseas products stating that any that are not subject to the SDR[13,14]. The UK government has also recently confirmed that it plans to consult on whether the SDR should be extended to overseas funds[15].

The four sustainability labels, restrictions on the use of sustainability-related terms in products' names and marketing materials and the sustainability-disclosure requirements will apply only to UK Undertakings for the Collective Investment in Transferable Securities (UCITS) management companies when managing a UK UCITS, and full-scope and small authorised UK Alternative Investment Fund (AIF) managers when managing UK AIFs. The FCA has decided not to apply some of these aspects to firms conducting portfolio management[13].

The new rules will be phased in from 31 May 2024; from 31 July 2024 firms will be able to use the labels and associated disclosures (numbers 2 and 4), and the remaining rules will be phased in from December 2024 to December 2026[13].

>

FIGURE 1: SDR implementation timeline – FCA



There are areas of alignment, but also areas of divergence with the EU's Sustainable Finance Disclosure Regulation (SFDR). Future developments have already been indicated by the FCA, for example possible incorporation with the work of the International Sustainability Standards Board (ISSB) and the UK Green Taxonomy[16].

WHO'S WITHIN SCOPE?

The SDR's application will vary depending on the type of firm and measure in question – see above[13].

ENFORCEMENT:

The FCA has a range of enforcement mechanisms – such as imposing financial penalties, prohibiting individuals from carrying out regulated activities, public censure and prosecution – in its arsenal for non-compliance[17].

WHO'S RESPONSIBLE?

The FCA.

MANDATORY IN THE UK?

✓

Taskforce on Climate-related Financial Disclosures (TCFD)

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The Financial Stability Board (FSB) created the TCFD in 2015 to improve and increase reporting of climate-related financial information. It was intended to provide recommendations on the types of information that companies should disclose to support investors in appropriately assessing and pricing a specific set of risks related to climate change[18]. TCFD covers scope 3 emissions.

WHO'S WITHIN SCOPE?

The TCFD is already in UK law. The Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2021 and the Limited Liability Partnerships (Climate-related Financial Disclosure) Regulations 2022 incorporated the TCFD into UK legislation. Now, listed companies with over 500 employees – alongside private companies and Limited Liability Partnerships (LLPs) with more than 500 employees and a turnover of over £500 million – must disclose their governance, strategy, risk management and use of metrics and targets regarding climate risks and opportunities within their annual Strategic Report. This needs to include the use of scenario analysis. These requirements apply for accounting periods starting on or after 6 April 2022. UK premium listed companies are also required to provide TCFD disclosures as part of the FCA's Listing Rules. This now also includes standard listed issuers, and there are new rules for asset managers, life insurers and FCA-regulated pension providers, which apply for accounting periods beginning on or after 1 January 2022[19].

ENFORCEMENT:

The FRC is responsible for monitoring the contents of Strategic Reports and can ask the courts for a declaration that a company's annual report and accounts, or a Strategic Report or a Directors' Report, do not comply with the requirements of the Companies Act. The court can order revised accounts be prepared and other such matters as the court sees fit[20]. Companies House can reject a company's annual accounts if the information provided is inadequate. Businesses could be liable for fines (ranging from £150-£7,500) in the form of late deadline penalties when they then come to resubmit their annual accounts[11,21]. The FCA has a range of enforcement mechanisms in its arsenal for non-compliance[17].

WHO'S RESPONSIBLE?

FCA, FRC and Companies House in the UK. Following the release of the Task Force's 2023 Status Report, the TCFD has been disbanded. The International Financial Reporting Standards (IFRS) Foundation have taken over monitoring the progress of companies' climate-related disclosures.

MANDATORY IN THE UK?

✓

PART TWO

THE EUROPEAN LANDSCAPE FOR CORPORATE REPORTING

Corporate Sustainability Due Diligence Directive (CSDDD)

European Commission

HUMAN RIGHTS; ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

It is fair to say that this EU Directive has had a bumpy ride of late. The Corporate Sustainability Due Diligence Directive (CSDDD) aims to *"foster sustainable and responsible corporate behaviour and to anchor human rights and environmental considerations in companies' operations and corporate governance."* In addition to this, the Directive will legally oblige EU corporations under scope to develop transition plans to ensure that their business strategy is compatible with limiting global warming to 1.5 °C in line with the Paris Agreement[22]. The CSDDD will complement existing corporate disclosure rules in the EU, i.e., the CSRD (Corporate Sustainability Reporting Directive) that entered into force in January 2023. The CSDDD can be seen as part of the mainstreaming of the UN Guiding Principles on Business and Human Rights into legislation[23].

WHO'S WITHIN SCOPE?

The CSDDD as originally proposed would have applied to EU companies and parent companies with over 500 employees and a net turnover of €150m globally. It would also have applied to non-EU companies and parent companies who have an equivalent turnover in the EU. Similarly to the CSRD, the CSDDD would also have been applicable for companies with over 250 employees and €40m turnover if half of that is generated in high-risk sectors[24,25]. However, following the failure of the CSDDD to secure a majority of votes by EU Member States on 28 February 2024, the text was changed before it was again voted on. The revised text, which was approved on 15 March 2024 by the EU's Committee of Permanent Representatives (COREPER) meeting, has been significantly watered down in scope. It will now apply to companies with over 1000 employees, the turnover threshold has jumped from €150m to €450m and the European Coalition for Corporate Justice estimates that the changes will decrease the total number of EU companies covered by the CSDDD from roughly 16,000 to under 5,500. Non-EU companies fall within scope if they have a €450m turnover in the EU. The new text excludes some downstream activities from due diligence duties, there will be a staged approach for implementation, and the financial incentives for directors to promote transition plans being implemented has been removed[26,27]. Financial institutions will only have to carry out due diligence for their upstream operations although it is likely this will be part of the planned review of the directive[24].

ENFORCEMENT:

In light of the concerns from various countries about the directive's provisions – reportedly around bureaucracy implications, reduced business competitiveness, plus some political wrangling within and between states, the vote by EU Member States on the CSDDD was postponed from 9, then to 14, February 2024 and finally rearranged for 28 February, when it failed to pass[28–33]. It finally passed the COREPER on 15 March 2024, and the final step will be a vote by the EU Parliament, likely in April (although there is still no guarantee it will pass)[26]. If and when adopted, the CSDDD will be mandatory and provide for possible financial penalties of up to 5% of a company's global turnover[34].

WHO'S RESPONSIBLE?

If and when officially adopted the Directive will have to be transposed into domestic laws within two years by EU Member States[35].

MANDATORY IN THE UK?

✗ (except for companies/investors that will fall within scope)

Corporate Sustainability Reporting Directive (CSRD)

European Commission

HUMAN RIGHTS; ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The Corporate Sustainability Reporting Directive (CSRD) replaced and builds on the Non-Financial Reporting Directive (NFRD). The CSRD entered into force on 5 January 2023 and companies will report against the European Sustainability Reporting Standards (ESRS), which are designed to be interoperable with the ISSB standards[34]. The ESRS were due to be mandatory, but the European Commission decided in July 2023 to move away from mandatory core sustainability disclosures. The first set of 12 sector-agnostic ESRS was adopted in July 2023. The European Financial Reporting Advisory Group (EFRAG) is continuing to work on the development of the sector-specific ESRS and has recently published two working papers on these (see here and here)[36]. The Agriculture, Farming and Fisheries ESRS are currently in the early drafting phase, and the Food and Beverage ESRS are currently in the research stage[37,38]).

WHO'S WITHIN SCOPE?

The CSRD applies to: large, listed and non-listed, EU companies; listed EU small and medium-sized enterprises (SMEs); and non-EU companies with at least one EU subsidiary or branch. For the purposes of the CSRD,

"large" is considered to mean two or more of: 250 employees; €20 million in balance sheet total; €40 million in net turnover. The non-EU parent company must have at least €150 million turnover in the EU, while its EU-listed subsidiary must be large and/or its EU branch must have at least €40 million turnover in the EU. This means that around 50,000 companies across Europe have to disclose information on business model and strategy, policies, risks, targets and due diligence relating to environmental (including scope 3 emissions if they are material), social and employee matters, respect for human rights, anti-corruption and bribery issues, and diversity in their board of directors[12,39].

The first companies will have to apply the rules for the first time in the 2024 financial year, for company reports published in 2025[22]. Listed SMEs will be in scope from 2026 and their first CSRD report due in 2027, with a possibility of voluntary opt-out from reporting until 2028. However, it is possible that the deadline for non-EU companies in scope and the adoption of the sector-specific standards could be postponed to June 2026[40].

ENFORCEMENT:

The CSRD does provide for penalties for non-compliance; however, the provision and enforcement of penalties is currently at the discretion of each individual Member State, meaning that there could be significant variation in the penalties imposed.

WHO'S RESPONSIBLE?

Each EU Member State has to transpose the CSRD into their national legislation by July 2024, but so far only France and Finland have done so, although Italy is shortly expected to release draft legislation to transpose the CSRD into national law[41]. The Czech Republic looks likely to miss the deadline, and Sweden has recently proposed postponing the application of the CSRD by a year for the largest companies in scope[42].

MANDATORY IN THE UK?

✗ (except for companies/investors that fall within scope)

EU deforestation regulation (EUDR)

European Commission

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The EU implemented a new regulation on deforestation-free production in June 2023 to combat climate change and biodiversity loss[43]. The regulation prohibits the use of seven commodities linked to deforestation or forest degradation, which includes cattle, cocoa, coffee, palm oil, rubber, soya and wood and derived products.

WHO'S WITHIN SCOPE?

Operators and traders[i] are to establish and maintain due diligence systems to adhere to the new mandatory regulations. Relevant products cannot be placed into the EU market or exported from the UK unless they meet the following criteria:

- Product is deforestation free, which means the relevant commodities that were produced on land have not been subject to deforestation or forest degradation after 31 December 2020.
- They are in legal accordance with the relevant legislation in the country of production.
- They are covered by their own due diligence statement and must keep all documentation for a minimum of 5 years.

Operators and traders have until December 2024 to comply, and micro or small businesses have until June 2025 to do so[44]. Due diligence statements need to be submitted by businesses to their Member State through a system which is to be established by the European Commission by the end of 2024. Before the information is made publicly available, it will be anonymised and commercially sensitive data will be removed.

ENFORCEMENT:

EU Member States are responsible for carrying out inspections in line with the EUDR using a risk-based approach. This means it will be more rigorous for commodities produced in high-risk areas, while inspections will be simpler for commodities imported from low-risk areas. The European Commission will publish a list of countries that are low or high risk by the end of 2024.

For operators and traders who are non-compliant, Member States are able to apply a range of penalties such as fines, confiscation of non-compliant products and the revenues gained, temporary exclusion for a maximum period of 12 months from public procurement, and temporary bans from exporting and importing the commodities in question.

WHO'S RESPONSIBLE?

The responsibility to complete due diligence and report on a product's compliance with the EUDR sits with the companies. Implementing the regulation and ensuring full compliance lies with the Member States. The European Commission and Member States are also responsible for identifying further developments in the specifications as required in the future, for example through expanding the scope of commodities.

MANDATORY IN THE UK?

✗ (except for operators, traders and commodities that fall within scope)

[i] *Operators are any individual, company or business that imports relevant products into the EU market or exports them for commercial activity. Traders are any individual in the supply chain (except the operator) who supply the relevant products on the market for consumption, distribution or use on the EU market.*

PART THREE

THE GLOBAL LANDSCAPE FOR CORPORATE REPORTING

International Sustainability Standards Board (ISSB) standards

IFRS FSB

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

In 2021 the International Financial Reporting Standards (IFRS) Foundation launched the International Sustainability Standards Board (ISSB), aiming to create a baseline globally for corporate sustainability reporting[45]. The ISSB General Requirements for Disclosure of Sustainability-related financial information (IFRS S1), and the requirements for Climate-related Disclosures (IFRS S2; includes scope 3 emissions), were launched in mid-2023[12]. These standards are voluntary and build on the work of the TCFD, which was incorporated into the ISSB in 2023 and the IFRS Foundation has now taken over the monitoring of the progress of companies' climate-related disclosures[34,46]. The IFRS launched a consultation on the ISSB's priorities for the next two years, which closed on 1 September 2023. The results are still being analysed but it is widely expected that there will be alignment with the work of the Taskforce on Nature-related Financial Disclosures (TNFD).

WHO'S WITHIN SCOPE?

Although voluntary, several countries are in the process of introducing or exploring reporting based on the ISSB's two initial standards. Responsible Investor have created a tracker to monitor which countries are adopting them[45]. Turkey (has introduced mandatory standards), and Hong Kong, Singapore, Republic of Korea, Japan, Canada, Australia, Nigeria and Malaysia are in various stages of exploration or consultation on the introduction of the ISSB standards in their countries' legislation[28,34,37,47,48].

ENFORCEMENT:

The UK government has stated that it plans to endorse the ISSB standards in 2024 – expected to be by July – and that it will only differ from the ISSB standards "if absolutely necessary"[12]. From 19 October to 14 December 2023 the UK government ran a consultation on the costs, benefits and practicalities of scope 3 emissions reporting to help inform the government's decision on whether to endorse the ISSB standards and potentially make mandatory the currently voluntary scope 3 emissions reporting in the SECR. The results of the consultation have yet to be published; the government aims to publish its response to the consultation within 12 weeks of the closing date, so the outcome should be expected soon.

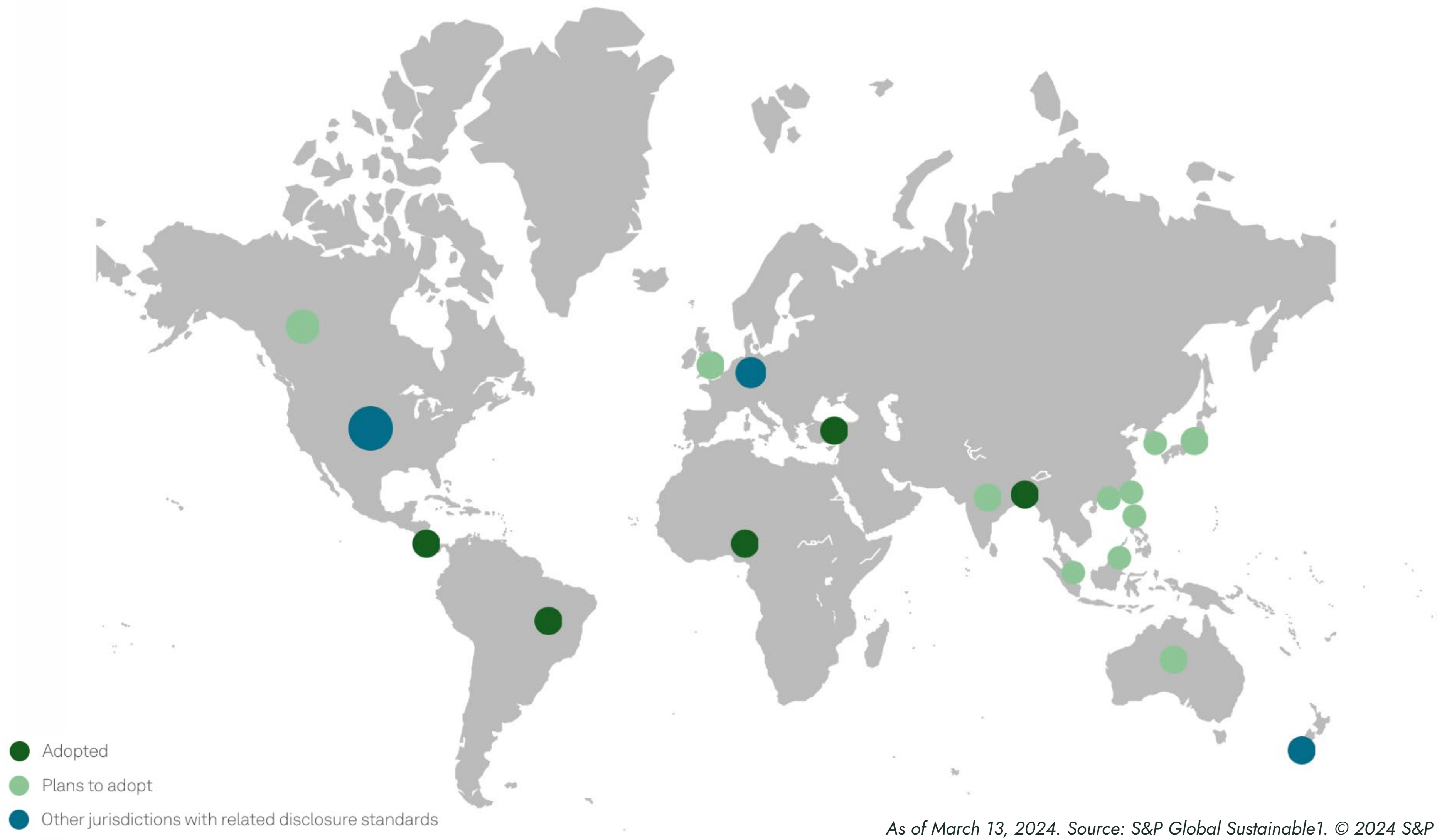
WHO'S RESPONSIBLE?

Although the UK has yet to officially endorse the ISSB standards, the Department for Business and Trade, FCA and FRC are all involved in the endorsement process[49]. The IFRS Foundation is responsible globally for the ISSB standards.

MANDATORY IN THE UK?

✓ (expected to be)

FIGURE 2: S&P GLOBAL SUSTAINABLE1 - THE ISSB'S DISCLOSURE STANDARDS AND THEIR ADOPTION GLOBALLY



As of March 13, 2024. Source: S&P Global Sustainable1. © 2024 S&P Global[73]

Science-Based Targets

SCIENCE BASED TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

In 2018 the Intergovernmental Panel on Climate Change (IPCC) warned that global temperature rises must not exceed 1.5 °C beyond pre-industrial levels if we are to avoid climate catastrophe. This is widely referred to as the Paris Agreement. Businesses and financial institutions have vital roles to play in driving down Greenhouse Gas (GHG) emissions and building a resilient net-zero economy. Science Based Targets (SBTs) provide a roadmap for businesses to reduce their GHG emissions and are increasingly regarded by businesses as the North star in helping them achieve net-zero.

The Science Based Target Initiative (SBTi) is a global body that demonstrates best practice and provides support and independent verification for businesses who set SBTs[50]. Their goal is to accelerate companies across the world to halve emissions by 2030 and meet net-zero by 2050. SBTi give companies two years to have their target accredited after they signal their intention to do so publicly. Companies who do not have their targets approved are listed as having 'commitment removed' on their dashboard, which is updated weekly. Food companies JBS and Yum Brands are the most recent food companies to have been publicly named for their failure to set approved climate reduction targets within the two year time frame[51].

Since 2019, the concept of net-zero has been gaining traction. In 2021 70% of the global economy had pledged to be net-zero by 2050[52]. The problem is that there is no clear definition of what net-zero means, or how to get there. The SBTi has responded to this criticism and in 2021 launched the SBTi Net-Zero Standard[53].

The SBTi is now in the process of developing a Net-Zero Standard for Finance Institutions (FINZ Standard)[54]. The goal is for financial institutions to set emission reduction targets that are consistent with the wider net-zero by 2050 targets across their portfolio. As with the business sector, there has been a failure to agree a consistent and independent way of validating net-zero pledges. The purpose of the Financial Institution Net-Zero Standard is to define the basis of a target-setting standard, provide clarity on key concepts, and establish qualitative and quantitative criteria for assessing financial net-zero targets. The SBTi has been overseeing a consultation and is currently assessing feedback with the aim of developing a FINZ Standard that will be launched sometime in 2024.

There are several incentives for businesses to set SBTs. These include:

- **Staying ahead of regulatory developments**. Countries are announcing climate targets that will become embedded in the regulatory landscape that a company operates in. Businesses need to stay ahead of policy developments by setting their own targets.
- **Competition**. Businesses can stay ahead of the game by taking advantage of opportunities within the transformation to net-zero (e.g. developing low-carbon solutions).
- **ESG**. Investors, customers and employees have increasing expectations on businesses to have net-zero targets and strategies in place on how to get there.

WHO'S WITHIN SCOPE?

Any company wishing to set SBTs can work with the SBTi to do so. SBTs have gained significant currency within the business community. As of March 2023, the SBTi has approved over 2,300 science-based targets. Their 2021 progress report showed that one third of global market capitalisation has committed to climate action through the SBTi and 1.5 billion tonnes of CO2 are covered by the SBTi[55].

ENFORCEMENT:

SBTs are voluntary, and as such there is no enforcement mechanism; however, the Net-Zero Standard provides a robust framework that companies can use to ensure that their net-zero targets are aligned with climate science and can be achieved in the near and long-term.

WHO'S RESPONSIBLE?

SBTi oversees the targets validation process.

MANDATORY IN THE UK?

✗

The Taskforce on Nature-related Financial Disclosures (TNFD)

Taskforce on Nature-related Financial Disclosures

ENVIRONMENT

WHAT IS IT AND WHY DOES IT MATTER?

The first UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report, released in 2019, called attention to the sharp decline of the world's natural capital. It asserted that ecosystems, social stability, and the world economy would be seriously disrupted by deforestation, land degradation and biodiversity loss if systemic action was not taken[56].

The TNFD was established as a science-based, market-led, and government-supported global initiative to develop and disseminate a global framework for organisations with a risk management and disclosure framework to assess and act on evolving nature-related dependencies, impacts, risks and opportunities. Their guidance is designed to help businesses consider the financial materiality and impacts of biodiversity loss, with the aim of supporting a shift in global financial flows away from nature-negative outcomes and toward nature-positive outcomes[57].

It is structured around four pillars (governance, strategy, risk & impact management, metrics & targets), consistent with the Task Force on Climate-related Financial Disclosures (TCFD) and the International Sustainability Standards Board (ISSB). They accommodate the various current approaches to materiality and are aligned with the goals and targets of the Kunming-Montreal Global Biodiversity Framework[57].

WHO'S WITHIN SCOPE?

In January 2024, the TNFD announced the first cohort of Early Adopters - 320 organisations from over 46 countries, who intend to begin making disclosures aligned with the TNFD Recommendations in their corporate reporting by the financial year 2024 (or earlier) or 2025[58]. Notable UK-headquartered Early Adopters include the London Stock Exchange, Fidelity International, Federated Hermes, Schroders, PwC, Heathrow Airport Holdings Ltd, AstraZeneca and the BBC[59].

ENFORCEMENT:

TNFD currently operates a voluntary disclosure framework, so there is no enforcement mechanism. The UK Government has been urged by major companies and financial institutions (such as Lloyds Banking Group, KPMG and Tesco) to establish a roadmap for the enforcement of mandatory disclosures aligned with the TNFD framework, with the aim of accelerating widespread industry adoption[60].

WHO'S RESPONSIBLE?

TNFD.

MANDATORY IN THE UK?

✗

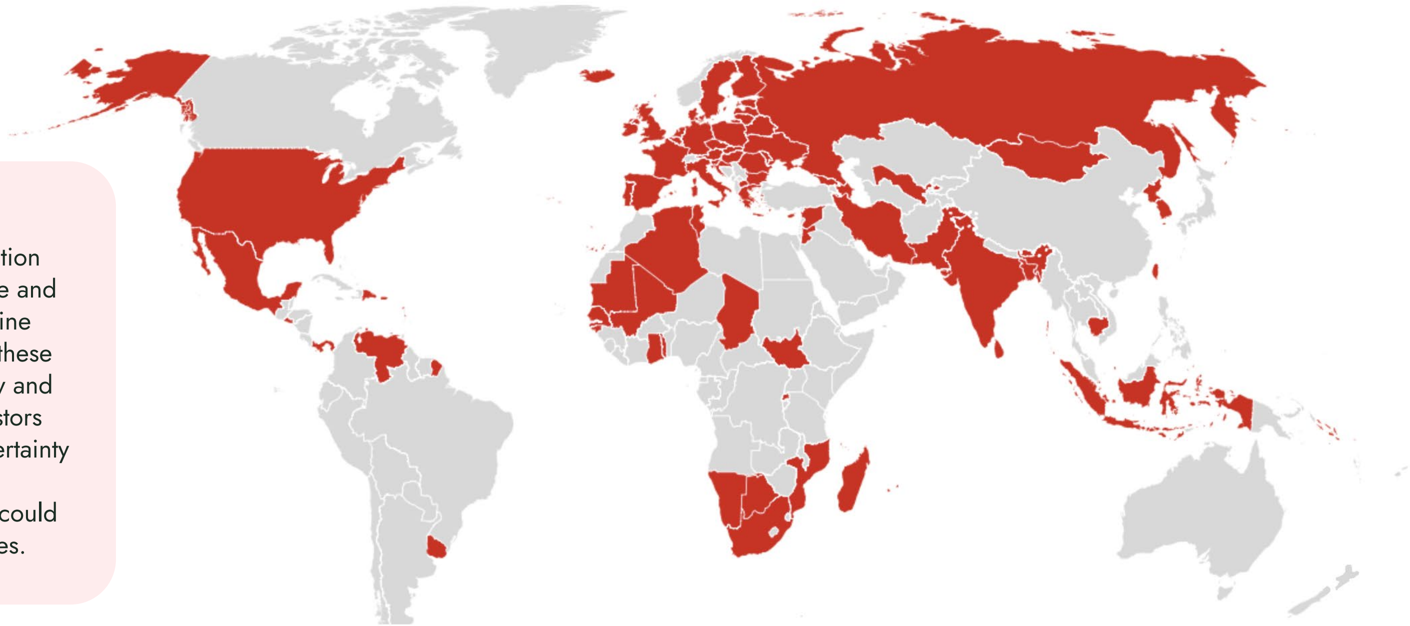
Why do the EU and global reporting requirements matter for the UK?

It might not always be immediately obvious to most of us, as we stand in front of the supermarket shelves choosing what we want to have for dinner, but our food system is inherently global. Consider all of the upstream and downstream operations involved in producing, packaging, transporting and consuming food. Food companies and their supply chains are frequently operating across continents, as are the investors providing the capital to the businesses. This means that reporting requirements at the EU or global level are likely to touch on some part or another of a food company and its supply chain, and UK businesses and investors will need to be aware of how regulations set elsewhere will impact on businesses' operations globally.

PART FOUR

HORIZON-SCANNING: AN EVOLVING POLITICAL AND REGULATORY LANDSCAPE

FIGURE 3:
Elections around the world in 2024 — Time[62]



Elections
2024 will see almost half of the world's population head to the polls, including in the USA, Europe and the UK, against a backdrop of democratic decline in many parts of the globe[61]. The outcomes of these elections could mean a rapidly-changing policy and regulatory landscape which could lead to investors and businesses having to adapt quickly to uncertainty and changing priorities (see, for example, the journey of the CSDDD in recent weeks) which could pose transition risks for investors and businesses.

TARGETING INVESTORS

Sustainable Finance Disclosure Regulation (SFDR)

European Commission

HUMAN RIGHTS; ENVIRONMENT

The SFDR is a key pillar of the EU's Sustainable Finance agenda; it came into effect in March 2021 and its provisions have been in force fully since January 2023. The aim of the SFDR is to reduce greenwashing across financial products, and to improve transparency on how sustainability risks are considered and managed by investment firms, so that consumers and investors can make more informed decisions. The European Commission is currently carrying out an assessment of the SFDR, which could lead to a legislative review over the next couple of years[63].

Taskforce on Inequality and Social-related Financial Disclosures (TISFD)

HUMAN RIGHTS

The Taskforce on Inequality-related Financial Disclosures (TIFD) and Taskforce on Social-related Financial Disclosures (TSFD) were two initiatives that were developing in parallel but were merged in mid-2023 to become a "Taskforce on Inequality and Social-related Financial Disclosures" (TISFD) that considers social- and inequality-related financial risks and opportunities. The plan is for the TISFD framework to be interoperable within existing frameworks and standards such as the TNFD and ISSB standards. The TISFD expects to launch in September 2024 and start developing a disclosure framework[64].

Transition Plan Taskforce (TPT)

TPT Transition Plan Taskforce

ENVIRONMENT

UK Sustainability Disclosure Standards (SDS)

GOV.UK

ENVIRONMENT

The Transition Plan Taskforce (TPT) was announced at COP26 and launched by HM Treasury in April 2022 with a two-year mandate to develop a "gold standard" for private sector climate transition plans. The TPT Disclosure Framework was launched in October 2023 and has been developed in alignment with the ESRS and ISSB. Final Sector Guidance and additional information on nature, adaptation, just transition, emerging markets, developing markets and SMEs will launch in Spring 2024 (for example, the Food and Beverage sector guidance, published in April 2024: https://transitiontaskforce.net/wp-content/uploads/2024/04/Food-and-Beverage.pdf), and a "Forward Pathway" on transition plans will be published in Summer 2024[65]. The TPT framework is expected to become mandatory in the UK, likely according to the same timeline that the ISSB standards are expected to be made compulsory (July 2024)[66].

According to the UK government, the "UK Sustainability Disclosure Standards (SDS) will set out corporate disclosures on the sustainability-related risks and opportunities that companies face. They will form the basis of any future requirements in UK legislation or regulation for companies to report on risks and opportunities relating to sustainability matters, including risks and opportunities arising from climate change." The SDS will be based on the ISSB standards, and as highlighted earlier in the briefing, the UK government stated that it plans to endorse the ISSB standards to create UK SDS in 2024 – expected to be by July – and that it will only differ from the ISSB standards "if absolutely necessary." The aim is for the information disclosed by companies under the SDS to be globally comparable and useful for investors' decision-making[12,67]. The timing for reporting is yet to be confirmed but could be as early as January 2025[68].

The need for interoperability

In recent years there has been an explosion in the number of sustainability reporting standards as various bodies have responded to increased demand for information from market stakeholders and the increasingly urgent need to reduce greenhouse gas emissions. It is estimated that between 2013 and 2016 alone, the number of sustainability reporting frameworks doubled to almost 400[69]. Different stakeholders requesting data according to different frameworks places a heavy reporting burden on companies, leading to resource concerns, unnecessary costs, inefficiencies and wide variations in data accuracy. Yet well-designed regulation creates an essential enabling environment for businesses seeking to build long-term thinking and sustainability into their business models. It also creates a level playing field for companies, incentivising them to shift their product portfolios to healthier options, something which is difficult for companies to address in isolation. And it facilitates the allocation of capital toward more sustainable investment opportunities and supports the transition to a sustainable, affordable and healthy food system. Interoperability is therefore crucial in reducing the reporting burden and allowing for accurate and comparable information to be disclosed[70].

RECOMMENDATIONS

- Businesses are increasingly being held to account for their progress on sustainability by citizens, governments and investors. These measurement frameworks can help companies manage their businesses, as implementing these frameworks can help track progress and adjust where necessary. A lack of progress could lead to increased litigation brought using regulatory frameworks[36]. Businesses should start implementing reporting frameworks, even if not perfectly implemented initially, and use the opportunity to learn and improve[12,70].

- UK businesses with EU subsidiaries or operations should check to what extent the CSRD will apply to them; EFRAG has provided guidance that businesses can refer to[71].

- Irrespective of the outcome on the CSDDD, businesses – no matter how large – should work to ensure accountability, transparency and awareness of environmental and human rights due diligence throughout their operations and supply chains[35,72]. Indeed, many businesses will have already been doing so using some principles or frameworks already in existence, such as the UN Guiding Principles on Business and Human Rights and/or the OECD Guidelines for Multinational Enterprises.

- Investors should also work to ensure accountability, transparency and awareness of environmental and human rights due diligence throughout their operations as well as throughout their investee companies[72].

- Investors use data to understand risks and opportunities facing companies and support their investment and engagement decision making. Investors should engage with government, businesses and initiatives like the Investor Coalition on Food Policy to advocate for well designed, streamlined and interoperable reporting regulation that will facilitate their investment and engagement decision making.

- In their advocacy on well-designed reporting regulation, investors should advocate for corporate reporting to be made mandatory. Voluntary approaches to data disclosure have had only limited success in increasing transparency in the food industry. Standardised and mandatory reporting would be transformative in terms of increasing the comparability of data on food businesses' targets, commitment, and progress, as well as reducing the reporting burden on businesses who currently could be asked to report against a myriad of different frameworks.

FIGURE 4: Status of reporting initiatives in the UK in relation to the companies benchmarked in the Plating Up Progress (PUP) analysis

		ALDI	ASDA	CO-OP	ICELAND	LIDL	M&S	MORRISONS	OCADO	SAINSBURYS	TESCO	WAITROSE	ARAMARK	COMPASS GROUP	ELIOR	ISS	SODEXO	MITCHELLS& BUTLERS	NANDOS	THE RESTAURANT GROUP	JD WETHERSPOON	WHITBREAD	BURGER KING	DOMINOS	GREGGS	KFC	MCDONALDS	SSP	BIDFOOD	BRAKES	NESTLE	UNILEVER	MARS	NOMAD FOODS	PREMIER FOODS	GREENCORE	SAMWORTH BROTHERS
FDTP*	Health	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
	Eco	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Forest Risk Commodities regulations		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
SECR		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
TCFD		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
ISSB		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
SBTi		Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
TNFD		Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
TISFD*		Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
TPT		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
SDS		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow

Red: VOLUNTARY ONLY
Orange: IN DEVELOPMENT; EXPECTED TO BE VOLUNTARY
Yellow: NOT YET FINALISED / ENDORSED BUT EXPECTED TO BE MANDATORY
Green: MANDATORY AND IN FORCE

In development

FIGURE 5: Status of reporting initiatives in the EU and their applicability to companies benchmarked in the PUP analysis

	ALDI	ASDA	CO-OP	ICELAND	LIDL	M&S	MORRISONS	OCADO	SAINSBURYS	TESCO	WAITROSE	ARAMARK	COMPASS GROUP	ELIOR	ISS	SODEXO	MITCHELLS& BUTLERS	NANDOS	THE RESTAURANT GROUP	JD WETHERSPOON	WHITBREAD	BURGER KING	DOMINOS	GREGGS	KFC	MCDONALDS	SSP	BIDFOOD	BRAKES	NESTLE	UNILEVER	MARS	NOMAD FOODS	PREMIER FOODS	GREENCORE	SAMWORTH BROTHERS
CSDDD	✓	✓*	✗	✓*	✓	✓	✗	✓*	✗	✓	✓*	✓*	✓	✓	✓	✓	✓*	✓*	✓*	✓*	✓*	✓	✓*	✗	✓	✓	✓	✓	✓	✓	✓	✓*	✓	✓*	✓*	✗
CSRD	✓	✓*	✗	✓*	✓	✓	✗	✓*	✗	✓	✓*	✓*	✓	✓	✓	✓	✓*	✓*	✓*	✓*	✓*	✓	✓*	✗	✓	✓	✓	✓	✓	✓	✓	✓*	✓	✓*	✓*	✗
EU deforestation regulation*	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

MANDATORY AND IN FORCE (dark green: CSRD, EU deforestation regulation*)
APPROVED AND MANDATORY BUT NOT YET COMPLETED LEGISLATIVE PROCESS (light green: CSDDD)

**** business should check extent of applicability to them***

SDR and SFDR not included because they are applicable to investment firms, which are not assessed in PUP.

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