FEDIL

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FEDIL POSITION PAPER ON THE COMMISSION'S OMNIBUS I PROPOSAL

Amendments to the CSRD, CSDDD and EU Taxonomy

This position paper sets out FEDIL's views on the European Commission's proposal for a Directive amending several key EU legislative acts under the Omnibus I package (the "Amendment Directive"). It outlines the main content revisions proposed by the Commission and highlights the practical implementation challenges that companies are likely to face across the EU.

FEDIL welcomes the Commission's efforts to streamline and simplify sustainability-related legislation and remains ready to support the achievement of the objectives underpinning this legislative framework.

However, FEDIL urges that the simplification and harmonisation agenda be extended to include the other core components of EU sustainable finance legislation, such as the Sustainable Finance Disclosure Regulation, the Benchmark Regulation, the Capital Requirements Regulation and the Capital Requirements Directive. True simplification must be built on access to reliable, standardised data, as persistent gaps continue to represent a structural obstacle to effective compliance, particularly under the CSRD. Broadening the scope of this reform is essential to avoid regulatory overlap, reduce uncertainty, and enhance coherence across the EU legislative framework.

Equally important are clear and predictable implementation timelines, which are crucial to safeguarding legal certainty and supporting investor confidence.

Finally, preventing fragmentation within the Single Market is of critical importance. FEDIL emphasises the urgent need to address the incomplete Single Market clause in the CSDDD. The current wording still allows Member States to adopt stricter national rules, which could result in 27 diverging due diligence regimes. This risks raising compliance costs, increasing legal uncertainty, and distorting fair competition across the EU. As currently drafted, the Omnibus I proposal does not sufficiently resolve this concern. FEDIL therefore calls for the inclusion of a robust and comprehensive Single Market clause covering the directive's scope, definitions, due diligence steps,

supervisory powers, transition plan requirements, and stakeholder engagement rules.

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