



31.10.2025

RE: Swift approval of the Delegated Act regarding the EU Taxonomy

Dear Madam / Sir,

As a forum comprising 60 large, multinational industrial companies headquartered in Europe, the European Round Table for Industry (ERT) welcomes the simplifications outlined in the Delegated Act regarding EU Taxonomy which was adopted by the European Commission on 4 July 2025.¹

The introduction of materiality thresholds for all three EU Taxonomy KPIs, the voluntary reporting of the OPEX KPI if non-material, and the changes to Appendix C are useful first steps to increase the usability of the EU Taxonomy and to reduce unnecessary reporting burden for preparers.

Even though, as argued in previous [papers](#), more simplifications to the EU Taxonomy are necessary to reduce the overall reporting burden on companies by at least 25% and to improve the usability of the EU Taxonomy, it is now essential that the Delegated Act is not rejected. Companies need legal certainty as quickly as possible.

ERT member companies have strong concerns regarding the European Parliament's decision to extend the scrutiny period of the Delegated Act until 5 January 2026. It creates high legal uncertainty and potentially avoidable effort for all European companies as they are already in the process of preparing their annual financial statement and sustainability reports for financial year 2025.

The Council's approval of the Delegated Act would be a crucial step in providing companies with the certainty they need to meet their reporting obligations.

Likewise, a swift and positive decision by the European Parliament would give the necessary legal clarity and effectively reduce the reporting burden for preparers.

Otherwise, it will remain unclear if the Delegated Act can be legally implemented already for financial year 2025 if it is only published in the Official Journal in January 2026.

¹ Commission delegated regulation amending Commission Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Commission Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives [2025/2806(DEA)].

We therefore would kindly urge you to speed up the legislative process and swiftly vote on the new EU Taxonomy Delegated Act.

This would bring necessary relief to European preparers.

Sincerely,

Walter Merti

Member of the Board of Management of BMW AG, Finance
Chair, ERT CFO Platform