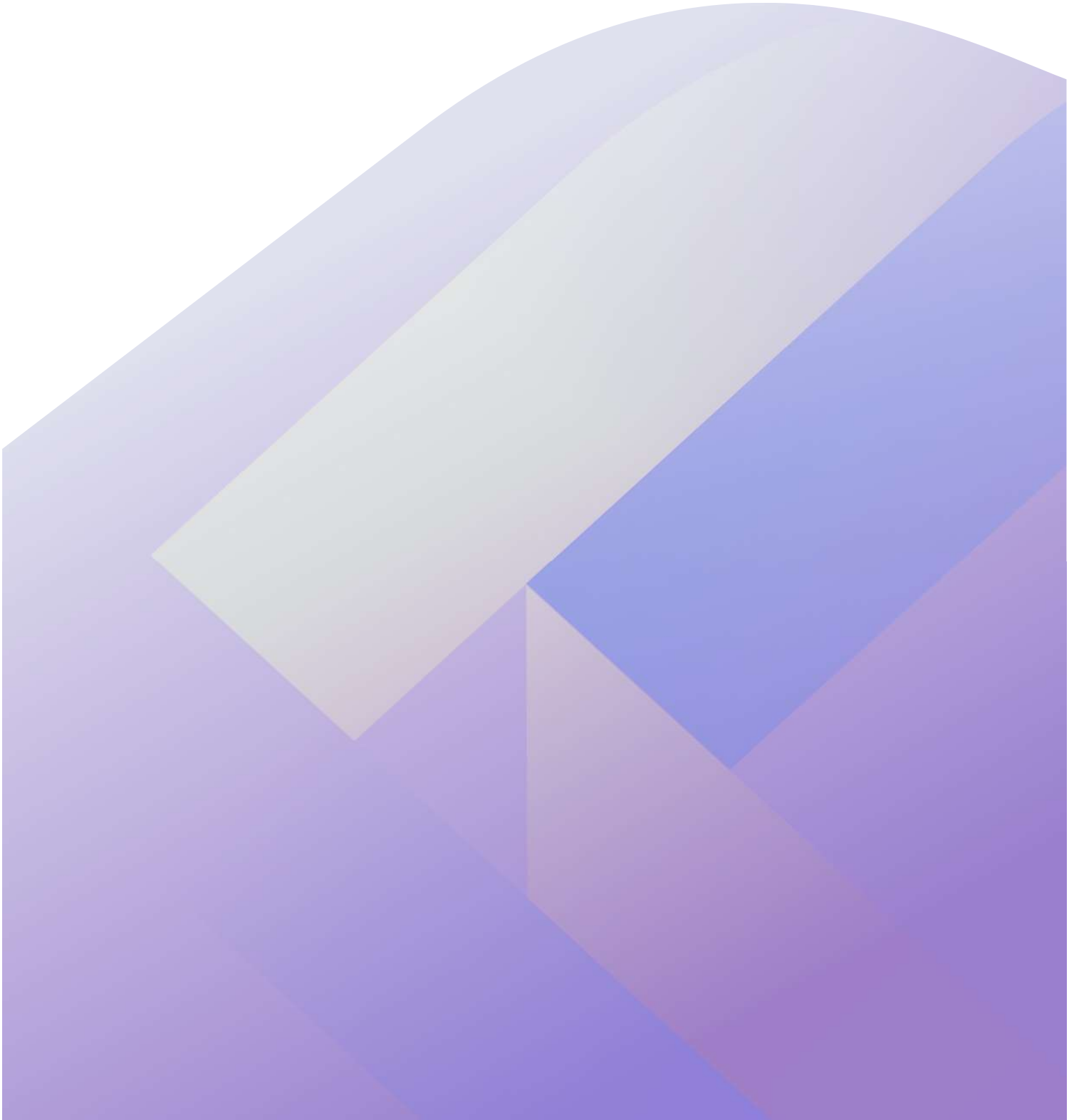
2 May 2025
ESMA84-858037815-683

Reply form

for the Consultation Paper on Technical Standards under the Regulation on transparency and integrity of Environmental, Social and Governance (ESG) rating activities



Responding to this paper

ESMA invites comments on all matters in this consultation paper and in particular on the specific questions. Comments are most helpful if they:

- respond to the question stated;
- indicate the specific question to which the comment relates;
- contain a clear rationale; and
- describe any alternatives ESMA should consider.

ESMA will consider all comments received by **20 June 2025.**

Instructions

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

1. Insert your responses to the questions in the Consultation Paper in the present response form.

2. Use this form and send your responses in Word format (**pdf documents will not be considered except for annexes**);

3. Please do not remove tags of the type <ESMA_QUESTION _ESGR_1>. Your response to each question has to be framed by the two tags corresponding to the question.

4. If you do not wish to respond to a given question, please do not delete it but simply leave the text "TYPE YOUR TEXT HERE" between the tags.

5. When you have drafted your response, name your response form according to the following convention: ESMA_EUGB_nameofrespondent_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESMA_ESGR_ABCD_RESPONSEFORM.

6. Upload the form containing your responses, **in Word format**, to ESMA's website (www.esma.europa.eu under the heading "Your input – Open Consultations" -> Consultation Paper on technical standards on the European Green Bonds Regulation").

Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publically disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA's Board of Appeal and the European Ombudsman.

Data protection

Information on data protection can be found at www.esma.europa.eu under the heading Legal Notice.

Who should read this paper

All interested stakeholders are invited to respond to this Consultation Paper. In particular, ESMA encourages entities that intend to apply for registration as external reviewers of European Green Bonds, as well as financial market participants who have or intend to issue or invest in green bonds or sustainability-linked bonds, to participate.

General information about respondent

Name of the company / organisation	Per Consulting Srl
Activity	Audit/Legal/Individual
Are you representing an association?	☐
Country/Region	Italy

Questions

Q1 Do you agree with ESMA's proposals for the draft technical standard under Articles 6(3) and 12(9)?

<ESMA_QUESTION_ESGR_1>

Yes I do

<ESMA_QUESTION_ESGR_1>

Q2 Do you agree with ESMA's proposals for the draft technical standard under Article 16(5)?

<ESMA_QUESTION_ ESGR_2>

Yes I do

<ESMA_QUESTION_ ESGR_2>

Q3. Do you agree with ESMA's proposals for the draft technical standard under Articles 23(4) and 24(3)?

<ESMA_QUESTION_ ESGR_3>

Yes I do

<ESMA_QUESTION_ ESGR_3>

Q4. Do you consider that the draft technical standards under Articles 23(4) or 24(3) should instead provide an expanded table in Annex proposing a sequence and structure for all disclosures to be made under parts 1 and 2 of Annex III? If yes, please explain the benefits of such an approach.

<ESMA_QUESTION_ ESGR_4>

Yes, Enhanced Clarity and Consistency An expanded table would act as a standardized disclosure framework, helping entities understand:

- **What** needs to be disclosed,
- **Where** to disclose it, and
- **In what order or structure** the information should appear.

This would improve comparability and consistency across disclosures by different reporting entities, reducing interpretive discrepancies.

- **2. Reduced Compliance Risk**

By offering a clear structure:

- Entities are less likely to omit required disclosures inadvertently.
- It helps ensure completeness, reducing the risk of non-compliance with the technical standards under Articles 23(4) or 24(3).
- **3. Streamlined Reporting Process**

For preparers of disclosures:

- A sequenced table serves as a **checklist and roadmap**.
- It saves time and effort by providing a predefined format, rather than leaving entities to structure the disclosures themselves.
- **4. Facilitates Stakeholder Review**

For auditors, regulators, and investors:

- A common structure supports **easier review and analysis** of disclosures.
- It reduces confusion and increases transparency across reports.
- **5. Supports Digital Reporting and XBRL Tagging**

If the structure is standardized, it aligns more easily with taxonomy mapping for digital reporting (e.g., in ESEF or XBRL formats), supporting automation and interoperability.

Conclusion:
Yes, the inclusion of an expanded table would improve the usability, reliability, and comparability of disclosures. It aligns with the broader objectives of transparency, standardization, and efficiency under the EU sustainable finance framework.

<ESMA_QUESTION_ ESGR_4>

Q5 Do you agree with ESMA's proposed cost benefit analysis? If not, please explain.

<ESMA_QUESTION_ ESGR_5>

Yes I do

<ESMA_QUESTION_ ESGR_5>