

[DISCLAIMER]

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Additional disclaimer for SR TEG public agenda papers 25 October 2022

This paper is a draft [Draft] standard prepared by the EFRAG Secretariat for approval of SR TEG and, once approved, it forms the advice that according to EFRAG Due Process SR TEG delivers to SRB as recommended content of the [Draft] final standards to be delivered to the European Commission in November 2022.

This draft reflects the tentative decisions of the SRT in the meetings from June to October 2022 (and reflects the content of the Agenda Papers prepared for those meetings). It has been developed starting from the ESRS Exposure Draft of April 2022, taking into account:

- the revised CSRD text released at the end of June;
- alignment with EDs IFRS S1, S2 and GRI standards as required by the new CSRS whenever possible;
- feedback received from the public consultation.

This draft is an intermediate version of the [Draft] standard and quality checks are still in progress that will result in editorial changes and further presentation/language streamlining. This includes editorial and presentation review, consistency of language across the standards, update of the references to paragraphs/chapters/sessions within the standard and across all the standards, alignment of definitions and glossary across all standards, possible changes of terminology due to recent IFRS decisions. The items in yellow are also subject to change (reflecting the ongoing quality check or pending other external confirmations). In ESRS 2 items in grey mark the datapoints that have been added for alignment with IFRS S1.

Changes are also possible in the next steps of SRB deliberation and approval, including changes other than editorial.

Table of contents

Objective	3
Interactions with other ESRS	4
Disclosure Requirements	4
General, Strategy, Governance and Materiality assessment	4
Disclosure Requirement E5-1 – Policies related to resource use and circular economy	5
Disclosure Requirement E5-2 – Targets related to resource use and circular economy	5
Disclosure Requirement E5-3 – Action plans and resources in relation to resource use and circular economy	6
Performance measurement	7
Disclosure Requirement E5-4 – Resource inflows	7
Disclosure Requirement E5-5 – Resource outflows	7
Disclosure Requirement E5-6 – Financial effects from resource use and circular economy-related impacts, risks and opportunities	9
Appendix A: Defined terms	10
Appendix B: Application Requirement	13
General, Strategy, Governance and Materiality assessment	13
Resource use and circular economy-related specific application Requirement on ESRS 2	
Disclosure Requirements IRO on impacts, risks and opportunities	13
Policies, targets, action plans and resources	15
Disclosure Requirement E5-1 – Policies related to resource use and circular economy	15
Disclosure Requirement E5-2 - Targets related to resource use and circular economy	15
Disclosure Requirement E5-3 – Action plans and resources in relation to resource use and circular economy	16
Performance measurement	16
Disclosure Requirement E5-4 - Resource inflows	16
Disclosure Requirement E5-5 - Resource outflow	17
Disclosure Requirement E5-6 – Financial effects from resource use and circular economy-related impacts, risks and opportunities	18

Objective

1. The objective of this [draft] Standard is to specify disclosure requirements which will enable users of the sustainability statements to understand:
 - (a) how the undertaking affects resource use, including the depletion of non-renewable resources and the regenerative production of renewable resources (referred to in this [draft] standard as “resource use and circular economy”) in terms of positive and negative material actual or potential adverse impacts;
 - (b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential adverse impacts arising from resource use and circular economy, including its measures to help decoupling its economic growth from the use of materials;
 - (c) the plans and capacity of the undertaking to adapt its business model and operations in line with circular economy principles including minimising waste, maintaining the value of products, materials and other resources at their highest value and enhancing their efficient use in production and consumption.
 - (d) the nature, type and extent of the undertaking’s material risks and opportunities related to the undertaking’s impacts and dependencies, arising from resource use and circular economy, and how the undertaking manages them;
 - (e) the effects of risks and opportunities, related to the undertaking’s impacts and dependencies on resource use and circular economy, on the undertaking’s development, performance and position over the short, medium and long term and therefore on its ability to create enterprise value.
2. This [draft] Standard derives from the [draft] Corporate Sustainability Reporting Directive stating that the sustainability reporting standards shall specify information to disclose about “resource use and circular economy”.
3. This Standard sets out disclosure requirements related to “resource use” and “circular economy” and in particular on:
 - (a) resource inflows including the circularity of material resource inflows, considering renewable and non-renewable resources;
 - (b) resource outflows including information on products and materials and waste.
4. Circular economy means an economic system whereby the value of products, materials and other resources in the economy is maintained for as long as possible, enhancing their efficient use in production and consumption, thereby reducing the environmental impact of their use, minimizing waste and the release of hazardous substances at all stages of their life cycle, including through the application of the waste hierarchy.
5. The goal is to maximise and maintain the value of the resources, products and materials by creating a system that allows for renewability, long life optimal use or re-use, refurbishment, remanufacturing, recycling and biodegradation.
6. This [draft] Standard also builds on existing EU legislative frameworks and policies which are referred to in this Standard: the EU Green Deal, Regulation (EU) 2019/2088 (SFDR), Regulation (EU) 2020/852 (the EU Taxonomy), EU Circular Economy Action Plan¹, the Waste Framework directive and the EU industrial strategy.
7. To evaluate the transition from a “business as usual” to a circular economic system, this [draft] Standard relies on the identification of resources, materials and products physical flows used by

¹ https://ec.europa.eu/environment/strategy/circular-economy-action-plan_en

the undertaking and the share of circularity achieved through Disclosure Requirement E5-4 Resource inflows and Disclosure Requirement E5-5 Resource outflows.

Interactions with other ESRS

8. Resource use and circular economy is closely connected to other environmental sub-topics such as climate change, pollution, water and marine resources and biodiversity. The circular economy is a system that tends towards a sustainable production and consumption. In doing so, the system brings multiple environmental benefits, in particular, the reduction of energy consumption and emissions into the air (carbon emission or other pollution), the limitation of water withdrawals and discharges and the regeneration of nature limiting the impact on biodiversity.
9. Thus, to provide a comprehensive overview of what could be material to resource use and circular economy, relevant disclosure requirements can also be found in other ESRS, and are referenced in this Standard, such as:
 - (a) ESRS E1 Climate change, which addresses in particular GHG emissions and energy resources (energy consumption);
 - (b) ESRS E2 Pollution, which addresses in particular emissions to water, air and soil as well as substances of concern;
 - (c) ESRS E3 Water and marine resources, which addresses in particular water resource (water consumption) and marine resources;
 - (d) ESRS E4 Biodiversity and ecosystems, which addresses in particular ecosystems and species and raw materials.
10. This [draft] Standard covers an environmental sub-topic, however as people benefit from nature, the undertaking' impacts on nature affect communities. Material negative impacts on affected communities from resource use and circular economy related impacts attributable to the undertaking are covered in ESRS S3 Affected communities.
11. The contents of this [draft] Standard on strategy and business model, governance and organisation and Impacts, risks and opportunities, as well as policies, targets, action plans and resources shall be read in conjunction respectively with cross-cutting standard ESRS 2 General disclosures.
12. This Standard covers sector-agnostic disclosure requirements. Sector-specific disclosure requirements are developed separately and in accordance with the classification following ESRS SEC 1 Sector classification².

Disclosure Requirements

General, Strategy, Governance and Materiality assessment

13. The provisions of this [draft] Standard shall be read in conjunction with and reported alongside the disclosure requirements of ESRS 2.

² ESRS SEC 1 to be issued at a later stage.

Disclosure Requirement IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

14. The undertaking shall describe the process to identify material impacts, risks and opportunities related to resource use and circular economy and in particular:
- (a) the methodologies and tools used to screen its assets and activities in order to identify its actual and potential risks in its own operations and value chain;
 - (b) the interconnection between risks and opportunities arising from impacts and dependencies;
 - (c) the process for conducting consultations and in particular with affected communities³.

Policies, targets, action plans and resources

Disclosure Requirement E5-1 – Policies related to resource use and circular economy

15. **The undertaking shall disclose its policies implemented to manage its material impacts, risks and opportunities related to resource use and circular economy.**
16. The objective of this Disclosure Requirement is to provide an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material impacts, risks and opportunities related to resource use and circular economy.
17. The summarised description of the policy shall contain the information required in ESRS 2 Disclosure Guideline IRO-DG1 – On policies adopted to manage material sustainability matters.
18. In the summary, the undertaking shall indicate whether and how its policies address the following areas where material:
- (a) transition away from extraction of virgin non-renewable resources;
 - (b) implement practices that secure and contribute to the regenerative production of renewable resources and the regeneration of ecosystems they are part of.
19. Policies shall address material impacts, risks and opportunities in its own operations and along the value chain.

Disclosure Requirement E5-2 – Targets related to resource use and circular economy

20. **The undertaking shall disclose the resource use and circular economy-related targets it has adopted.**
21. The objective of this Disclosure Requirement is to provide an understanding of the targets the undertaking has adopted to support its resource use and circular economy policy and address its material impacts, risks and opportunities.
22. The description of the targets shall contain the information requirements defined in ESRS 2, Disclosure Guideline MT- DG 1 on targets, progress and tracking effectiveness.
23. The disclosure required by paragraph 20 shall indicate whether and how its targets relate to:
- (a) outflows and waste (including in production, use phase and at end of functional life);

³ Source: IFC Performance Standard 6, 2012.

- (b) the increase of systemic circular design (including for instance product design);
- (c) the increase of circular material use rate;
- (d) the minimisation of virgin non-renewable raw material with possibly targets for virgin non-renewable raw material and targets for virgin renewable raw material; and
- (e) reversal of the depletion of the stock of renewable resources;
- (f) improvement of waste treatment;
- (g) other targets.

24. The undertaking shall specify to which layer of the waste hierarchy the target relates.

25. In addition to ESRS 2, MT- DG 1, the undertaking shall specify whether (local) ecological thresholds and organisation-specific allocations were taken into consideration when setting targets. If so, the undertaking should specify:

- (a) the ecological threshold identified and whether the threshold is organisation specific;
- (b) the methodology used to identify the threshold; and
- (c) how responsibility for respecting these thresholds is allocated to the organisational level.

Disclosure Requirement E5-3 – Action plans and resources in relation to resource use and circular economy

26. The undertaking shall disclose its resource use and circular economy action plans and the resources allocated to their implementation.

27. The objective of this Disclosure Requirement is to provide an understanding of the key actions taken and planned to achieve the resource use and circular economy related policy's objectives and targets.

28. The description of the resource use and circular economy-related action plans and resources allocated shall follow the principles defined in ESRS 2 IRO-DG2 – Action plans and resources in relation to policies and targets.

29. In addition to ESRS 2 IRO-DG2, the undertaking shall specify whether and how an action plan and resources cover:

- (a) one of the layer of the waste hierarchy: (a) prevention; (b) preparing for re-use; (c) recycling; (d) other recovery, e.g. energy recovery; and (e) disposal;
- (b) or a more detailed circular economy strategy throughout the value chain of the product: Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture and Repurpose), Recycle.⁴

The disclosure shall also include a description of the actions, including circularity measures, taken to prevent waste generation in the undertaking's upstream and downstream value chain and to manage significant impacts arising from waste generated.

⁴ [Categorisation system for the circular economy - Publications Office of the EU \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic_circular_economy_en.pdf)

Performance measurement

Disclosure Requirement E5-4 – Resource inflows

30. **The undertaking shall disclose information on its material resource inflows.**
31. The objective of this Disclosure Requirement is to provide an understanding of the resource use in the course of the undertaking's own operations and value chain.
32. The disclosure required by paragraph 30 shall include a description of its material inflows: products (including packaging) and materials, and property, plant and equipment used in the undertaking's own operations and along the value chain.
33. For undertakings for which inflows are material and those active in one of 'key products value chain' as defined in the EU Circular Economy action plan⁵ the undertaking shall include in tonnes on the reporting period:
- (a) the overall total weight of products and materials used during the reporting period;
 - (b) the weight in both absolute value and percentage of renewable input materials from regenerative sources used to manufacture the undertaking's products and services (including packaging); and
 - (c) the weight in both absolute value and percentage, of reused or recycled products and materials (*non-virgin*) used to manufacture the undertaking's products and services (including packaging).
34. The undertaking shall provide information on the methodologies used to calculate the data. It shall in particular specify whether the data is sourced from direct measurement or estimations and disclose the key assumptions used.

Disclosure Requirement E5-5 – Resource outflows

35. **The undertaking shall disclose information on its material resource outflows, including waste.**
36. The objective of this Disclosure Requirements to provide an understanding of:
- (a) how the undertaking contributes to circular economy by 1) designing products and materials in line with circular principles and 2) the extent to which products, materials and waste processing are recirculated in practice after first use;
 - (b) the undertaking's waste management strategy and the extent to which the undertaking knows how its waste is managed in its own activities.

Products and materials

37. The undertaking shall provide a description of the key products and materials that come out of the undertaking's production process and that are designed along circular principles, including durability, reusability, reparability, disassembly, remanufacturing, refurbishment, recycling or other optimisation of the use of the resource.

⁵ [A new Circular Economy Action Plan \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic_circular_economy_action_plan_2020.pdf)

- (d) the total amount and percentage of non-recycled waste⁷.
40. The undertaking shall also disclose the total amount of hazardous waste and radioactive waste generated by the undertaking, where radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom⁸.
41. The undertaking shall provide contextual information on the methodologies used to calculate the data. It shall in particular specify whether the data is sourced from direct measurement or estimations and disclose the key assumptions used. **Error! Reference source not found. Error! Reference source not found.**

Disclosure Requirement E5-6 - Financial effects from resource use and circular economy-related impacts, risks and opportunities

42. **The undertaking shall disclose its potential financial effects of risks and opportunities arising from resource use and circular economy -related impacts and dependencies.**
43. The objective of this Disclosure Requirement is to provide information on:
- (a) potential negative financial effects due to risks arising from resource use and circular economy -related impacts and dependencies is to provide an understanding of how these risks may affect the undertaking's financial performance and position over the short-, medium-, and long-term.
 - (b) potential positive financial effects due to opportunities arising from resource use and circular economy -related material impacts is to allow an understanding of how the undertaking may financially benefit from material resource use and circular economy -related opportunities.
44. The disclosure shall include:
- (a) a quantification of the potential financial effects in monetary terms, or where impracticable qualitative information;
 - (b) a description of the effects considered, the impacts and dependencies to which they relate and the time horizon in which they are likely to materialise;
 - (c) the critical assumptions used in the estimate, as well as the sources and level of uncertainty attached to those assumptions.
45. In the context of this Disclosure Requirement, potential financial effects shall include financial effects that do not meet the recognition threshold for inclusion in the financial statement line items and notes to the financial statements.
46. For the first three years of application of this ESRS, to comply with this Disclosure Requirement the undertaking may provide qualitative information only.

⁷ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 as reflecting an additional principal adverse impact as set out by indicator #13 in Table 2 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments.

⁸ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 as reflecting a mandatory principal adverse impact as set out by indicator #9 in Table 1 of Annex 1 of the related Delegated Regulation with regard to disclosure rules on sustainable investments.

Appendix A: Defined terms

This appendix is an integral part of the [draft] ESRS E5.

Associated process materials	Materials that are needed for the manufacturing process but are not part of the final product, such as lubricants for manufacturing machinery.
By-product	That a substance or object resulting from a production process the primary aim of which is not the production of that substance or object is considered not to be waste, but to be a by-product if the following conditions are met: (a) further use of the substance or object is certain; (b) the substance or object can be used directly without any further processing other than normal industrial practice; (c) the substance or object is produced as an integral part of a production process; and (d) further use is lawful, i.e. the substance or object fulfils all relevant product, environmental and health protection requirements for the specific use and will not lead to overall adverse environmental or human health impacts. (EU Waste Framework Directive)
Circular economy	Circular economy means an economic system whereby the value of products, materials and other resources in the economy is maintained for as long as possible, enhancing their efficient use in production and consumption, thereby reducing the environmental impact of their use, minimising waste and the release of hazardous substances at all stages of their life cycle, including through the application of the waste hierarchy.
Circular economy principles	The circular economy is based on three principles, driven by design: (i) eliminate waste and pollution; (ii) circulate products and materials at their highest value; and (iii) regenerate nature. (Ellen MacArthur Foundation)
Circularity enabler	The services, products or Business models that enable circular systems to be created including cross value chain initiatives.
Circular material use rate	Recirculation of materials, components and products in practice after first use employing the following strategies (in order of preference): - maintenance/prolonged use; - reuse/redistribution; - refurbishment/remanufacturing; - recycling, composting, or anaerobic digestion. The use rate is defined as the ratio of circular use of materials to overall use of materials.
Durability	The ability of a product, component or material to remain functional and relevant when used as intended.
Ecological (or socio-ecological) breakpoint or threshold	The point at which a relatively small change in external conditions causes a rapid change in an ecosystem. When an ecological threshold has been passed, the ecosystem may no longer be able to return to its state by means of its inherent resilience. (IPBES online glossary)
Hazardous/ non-hazardous waste	Hazardous (non hazardous) waste possesses (does not possess) any of the characteristics contained in Annex III of the Basel Convention, or that is (that is not) considered to be hazardous by national legislation.

Incineration with (without) energy recovery	Incineration is the controlled burning of waste at high temperature. It is with energy recovery when the energy created in the combustion process is harnessed for re-use, for example for power generation. It is without energy recovery when the heat generated by combustion is dissipated in the environment.
Landfilling	A waste disposal site for the deposit of the waste onto or into land ⁹ .
Linear economy	An economy in which finite resources are extracted to make products that are used - generally not to their full potential - and then thrown away ('take-make-waste'), leading to waste, pollution, and the degradation of natural systems. They could be understood as <u>business as usual</u> .
Longevity	Designed for maintenance and durability in such a way that encourages longer use than the industry standard in practice and at scale and in such a way that does not compromise circular treatment at the end of functional life. (Circulytics Definition List)
Natural Resource	Natural assets (raw materials) occurring in nature that can be used for economic production or consumption. (OECD Glossary of Statistical Terms)
Non-renewable material	Resources that are not able to be renewed or replenished on timescales relevant to the economy, i.e., not geological timescales, such as minerals, metals, oil, gas or coal. (Source: GRI 301 and BS 8001 Circular Economy and EMF)
Packaging	Product to be used for the containment, protection, handling, delivery, storage, transport and presentation of goods, from raw materials to processed goods, from the producer to the user or consumer, including processor, assembler or other intermediary. (ISO 21067-1:2016, Packaging — Vocabulary — Part 1: General terms)
Primary products	Grown, harvested or extracted raw materials. (inspired by GRI 306: Waste 2020)
Recovery	Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations ¹⁰ .
Recyclable materials	Materials which may be collected, separated or processed and returned to the economic mainstream in the form of secondary raw materials or products.
Recycling	Reduce a product all the way back to its basic materials, reprocessing and using them to make new products, components or materials. (Circulytics Definitions List)
Regeneration	Promotion of self-renewal capacity of natural systems with the aim of reactivating ecological processes damaged or over-exploited by human action (Ellen MacArthur Foundation)
Renewable materials	Material that is derived from resources that are quickly replenished by ecological cycles or agricultural processes, so that the services provided by these and other linked resources are not endangered and remain available for the next generation. (GRI 301: Materials 2016)

⁹ See EU, 1999, Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste.

¹⁰ See DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008

Resource use optimisation	To design, produce and distribute materials and products with the objective to keep them in use at their highest value. Eco-design and design for longevity, repair, reuse, repurposing, disassembly, remanufacturing are examples of tools to prevent from a quick and limited use of materials and products.
Resource inflows	Resource that enters the organisation's infrastructure. (inspired by Circulytics Definitions List)
Resource outflows	Resource that leaves the organisation's infrastructure. (inspired by Circulytics Definitions List)
Reuse	The repeated use of a product or component for its original intended purpose without significant modification, but potentially involving cleaning or small adjustments so it is ready for the next use. (Circulytics Definitions List)
Waste	Any substance or object which the holder discards or intends or is required to discard. (Article 3(1) of Directive 2008/98/EC of the European Parliament and of the Council)
Waste hierarchy	The following waste hierarchy shall apply as a priority order in waste prevention and management legislation and policy: (a) prevention; (b) preparing for re-use; (c) recycling; (d) other recovery, e.g. energy recovery; and (e) disposal ¹¹ .

¹¹ See art. 4 of the Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008.

Appendix B: Application Requirement

This appendix is an integral part of the proposed [draft] ESRS E5 Resource use and circular economy. It describes the application of the requirements set for in paragraphs 1–47 and has the same authority as the other parts of the [draft] ESRS Standard.

General, Strategy, Governance and Materiality assessment

Disclosure Requirement IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

- AR 1. When conducting a materiality assessment on environmental subtopics, the undertaking shall consider the four phases below, also known as the LEAP approach, proposed by the Taskforce on Nature-Related Financial Disclosures¹²:
- a) locate where in the own operations and along the value chain happen the interface with nature are the priority locations;
 - b) evaluate the resource use and circular economy -related dependencies and impacts;
 - c) assess the material risks and opportunities;
 - d) prepare and report the results of the materiality assessment.
- AR 2. The materiality assessment for ESRS E5 corresponds to the first three phases of this LEAP approach, the fourth phase addresses the outcome of the process. Further guidance and materials about this approach can be found in TNFD Nature-Related Risk & Opportunity Management and Disclosure Framework.
- AR 3. The process to assess the materiality of impacts, dependencies, risks and opportunities shall consider the provisions in ESRS 2 Disclosure Requirement IRO 1 and IRO 2.
- AR 4. The sub-topics covered by the materiality assessment under ESRS E5 include:
- a) the contribution to direct impact drivers (Resource use other than water use or raw materials (considered respectively under ESRS E3 and ESRS E4);
 - b) dependencies on ecosystem services.
- AR 5. Under paragraph a) ,the undertaking shall consider first **locating** where there are areas at risks for inflows, but also for outflows and in particular circular economy strategies and waste treatment in its own operations and along the value chain.
- AR 6. Under paragraph AR1 b the undertaking shall then consider **evaluating** impacts and dependencies. When disclosing information under paragraph AR1 c the undertaking may rely on primary, secondary or modelled data collection or other relevant approaches to assess material impacts, dependencies, risks and opportunities.
- AR 7. Based on the results of Phase 1 and 2, the undertaking shall finally consider **assessing** under paragraph c) material risks and opportunities:

- a) identifying transition risks and opportunities in its own operations and its upstream and downstream value chain by the category, including the risk of staying in a business as usual scenario:
 - (i) policy and legal, e.g. bans on the extraction and use of non-renewable resources;
 - (ii) technology;
 - (iii) market;
 - (iv) reputation (use of raw materials);
- b) identifying physical risks including depletion of stock and use of virgin and non-virgin renewable resources, decrease of virgin and non-virgin renewable resources;
- c) identifying opportunities categorized by^{13,14}:
 - (i) resource efficiency: e.g. transition to more efficient services and processes requiring less resources, eco-design for longevity, repair, reuse, recycle, by-products, take-back systems, decoupling activity from extraction of materials, intensifying circular material use; practices to ensure products and materials are collected, sorted, and reused, repaired, refurbished, remanufactured;
 - (ii) markets: e.g. development of less resource-intensive products and services, diversification of business activities, new business models such as product-as-a-service, pay-per-use, sharing, leasing);
 - (iii) financing: e.g. access to green funds, bonds or loans;
 - (iv) resilience: e.g. diversification of resources and business activities (e.g. start a new business unit on ecosystem restoration), investing in green infrastructures, adopting recycling and circularity mechanisms that reduce the dependencies, capability of the undertaking to safeguard future stocks and flows of resources; and
 - (v) reputation.

AR 8. When assessing material impacts, risks and opportunities, the undertaking shall consider the sub-subtopics of resource use and circular economy:

- a) resource inflows as regards the circularity of material resource inflows, considering separately renewable and non-renewable resources;
- b) resource outflows including products and materials and waste taking into account the waste hierarchy;
- c) resource use optimisation as regards the intensity of materials and products use;
- d) the creation of circular systems including cross value chain initiatives;
- e) waste management (hazardous and non-hazardous wastes) while specifying the potential adverse or beneficial other environmental impacts (climate change, water, pollution, biodiversity).

¹³ Source: TNFD, 2022, p.37

¹⁴ Source: CDSB Biodiversity Application Guidance 2021

- AR 9. The undertaking may consider the following methodologies to assess its impacts, risks and opportunities on its own operations and along its value chain: product and/or Organizational Environmental Footprint (PEF, OEF), Material Flow Analysis (MFA), Life Cycle Assessment.
- AR 10. When providing information on the outcome of the materiality assessment, the undertaking shall consider:
- a) a list of business units associated to resource use and circular economy material impacts, risks and opportunities in the context of the products and services of the undertaking and the waste it generates;
 - b) a list and prioritisation of the material resources used by the undertaking;
 - c) the material impacts and risks of staying in business as usual;
 - d) the material opportunities related to a circular economy;
 - e) the material impacts and risks of a transition to a circular economy; and
 - f) the stages of the value chain where resource use, risks and negative impacts are concentrated.

Policies, targets, action plans and resources

Disclosure Requirement E5-1 – Policies related to resource use and circular economy

- AR 11. The policies described under this Disclosure Requirement may be integrated in broader environmental or sustainability policies covering different subtopics.
- AR 12. When providing information on its policies, the undertaking shall consider whether and how its policies address:
- (a) the waste hierarchy: (a) prevention; (b) preparing for re-use; (c) recycling; (d) other recovery, e.g. energy recovery; and (e) disposal. In this context, the waste treatment cannot be considered as a recovery;
 - (b) the prioritization of strategies to avoid or minimise waste (Refuse, Rethink, Reduce, Re-use, Repair, Refurbish, Remanufacture and Repurpose) over waste treatment strategies (Recycling). The concepts of eco-design¹⁵, waste as a resource or post-consumer waste (at the end of a consumer-product lifecycle), should also be taken in consideration.
- AR 13. When defining its policies, the undertaking may consider the Paper on ‘Categorisation system for the circular economy’¹⁶, which describes circular design and production models, circular use models, circular value recovery models and circular support along the principles of the nine circular economy “R” strategies or principles: refuse, rethink, reduce, re-use, repair, refurbish, remanufacture, repurpose and recycle.

Disclosure Requirement E5-2 - Targets related to resource use and circular economy

- AR 14. When determining (local) ecological thresholds to set targets, the undertaking may refer to the guidance provided by the Science-Based Targets Initiative for Nature (SBTN) or any other guidance with a scientifically acknowledged methodology that allows to set science-based targets by identifying ecological thresholds and, if applicable, organisation-specific allocations.

¹⁵ As established by the Directive 2009/125/EC

¹⁶ [Categorisation system for the circular economy - Publications Office of the EU \(europa.eu\)](#)

- AR 15. When providing information on targets, the undertaking shall prioritise targets in absolute value.
- AR 16. When providing information under paragraph 23 (b), the undertaking shall specify whether the increased circular material use rate is additional, i.e. based on the development of secondary material sources or the production of circular products for example.
- AR 17. The targets may cover own operations and/or the value chain.

Disclosure Requirement E5-3 – Action plans and resources in relation to resource use and circular economy

- AR 18. When providing information under paragraph 0 and considering that resources are shared and that circular economy strategies may require collective actions, the undertaking shall specify the actions taken to engage with its upstream and downstream value chain and/or its local ecosystem on the development of collaborations or initiatives increasing the circularity of products and materials.
- AR 19. In particular, the undertaking may specify the following:
- a) how it contributes to circular economy, including for instance smart waste collection systems;
 - b) the other stakeholders involved in the collective actions: competitors, suppliers, retailers, customers, other business partners, local communities and authorities, government agencies;
 - c) a description of the organisation of the project including the specific contribution of the undertaking and the roles of the different stakeholders in the project: sponsors and other participants.
- AR 20. The action plans may cover the own operations and/or the value chain.

Performance measurement

Disclosure Requirement E5-4 - Resource inflows

- AR 21. Resource inflows indicators refer to all products and materials used for production and packaging of products and services including materials (raw, associated process materials, and semi-manufactured goods or parts), products, packaging, plant property and equipment. It may cover the following categories: IT equipment, textiles, furniture, buildings, heavy machinery, mid-weight machinery, light machinery, heavy transport, mid-weight transport, light transport and warehousing equipment.
- AR 22. The list of 'key products value chain' as defined in the EU Circular Economy¹⁷ mentioned in paragraph 33 is the following:
- 1. electronics and ICT;
 - 2. batteries and vehicles;
 - 3. packaging;
 - 4. plastics;

¹⁷ [A new Circular Economy Action Plan \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic_circular_economy_action_plan_en.pdf)

5. textiles;
6. construction and buildings;
7. food, water and nutrients.

AR 23. When an undertaking is subject to paragraph 33, it may also provide transparency on the materials that are sourced from by-products/waste stream (e.g. offcuts of a material that has not previously been in a product).

AR 24. The denominator of the percentage indicator required under paragraphs 33(b) and 33(c) is the overall total weight of materials used during the reporting period.

AR 25. The reported usage data are to reflect the material in its original state, and not to be presented with further data manipulation, such as reporting it as “dry weight”.

AR 26. In cases where reused, recycled, renewable categories overlap, the undertaking shall specify how double counting was avoided and choices that were made.

Disclosure Requirement E5-5 - Resource outflow

Products and materials

AR 27. Products and materials information to be provided under paragraph 37 refer to all materials and products that come out of the undertaking’s production process and that a company puts on the market (including packaging).

AR 28. When compiling the percentage indicator, the undertaking shall use as denominator the overall total weight of materials used during the reporting period.

AR 29. Products and services referred to in paragraph 38(b) may cover for instance:

- a) prevention of waste and pollution by customers (e.g. smart waste collection system);
- b) increase of the longevity of other products further down in the value chain;
- c) increase recycling yield (quantity and quality) of products further down in the value chain (e.g. materials that separate adhesives from cardboard);
- d) decrease the level of post-consumer waste.

AR 30. The undertaking may also provide information on its products and materials that are actually recirculated in practice through strategies described under paragraphs 38 (a) ii to 38 (a) v.

Waste

AR 31. When reporting composition of the waste, the undertaking shall specify:

- a) the waste streams, relevant to its sector or activities (e.g., tailings for an undertaking in the mining sector, electronic waste for an undertaking in the consumer electronics sector, or food waste for an undertaking in the agriculture or in the hospitality sector); and
- b) the materials that are present in the waste (e.g., biomass, metals, non-metallic minerals, plastics, textiles).

- AR 32. Besides incineration and landfilling, the undertaking may specify the other types of disposal operations such as dumping, open burning, or deep well injection.
- AR 33. When providing contextual information under paragraph 41 the undertaking may:
- a) explain the reasons for high weights of waste directed to disposal (e.g., local regulations that prohibit landfilling of specific types of waste);
 - b) describe sector practices, sector standards, or external regulations that mandate a specific disposal operation; and
 - c) specify whether the data has been modelled or sourced from direct measurements, such as waste transfer notes from contracted waste collectors.

Disclosure Requirement E5-6 - Financial effects from resource use and circular economy-related impacts, risks and opportunities

- AR 34. The quantification of the potential financial effects in monetary terms under paragraph 44(a) may be a figure or a range of figures.
- AR 35. When providing information under paragraph 44(b), the undertaking may illustrate and describe the business model to strengthen value retention.
- AR 36. The undertaking may include an assessment of its related products and services at risk over the short-, medium-, and long-term, explaining how these are defined, how financial amounts are estimated, and which critical assumptions are made.



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