

Why are Danish CSRD reports so much shorter than German reports?

Simon Taylor

Senior Director, Co-founder and Reporting Practice Lead

Position Green



We've supported hundreds of companies

Sustainability advisory and software

Powered by top advisors, AI, and customer collaboration for real impact.

CSRD & ESRS experts

Expert support from double materiality to assurance-ready reporting

Trusted to deliver

Purpose-built for sustainability since 2015, trusted by 1,000+ customers

TELE2

GETINGE

Lindab®

TIDEWATER

heijmans

BORG
AUTOMOTIVE NEWMAN

CITI

MTG

ellos

Vestas.

VIVA
VIVA WINES

CAIA

BioMar



KINNEVIK

ARJO

Boozt

sobi

STENA

BOS

Norvestor



Scandi
Standard

Everything you need for efficient sustainability management



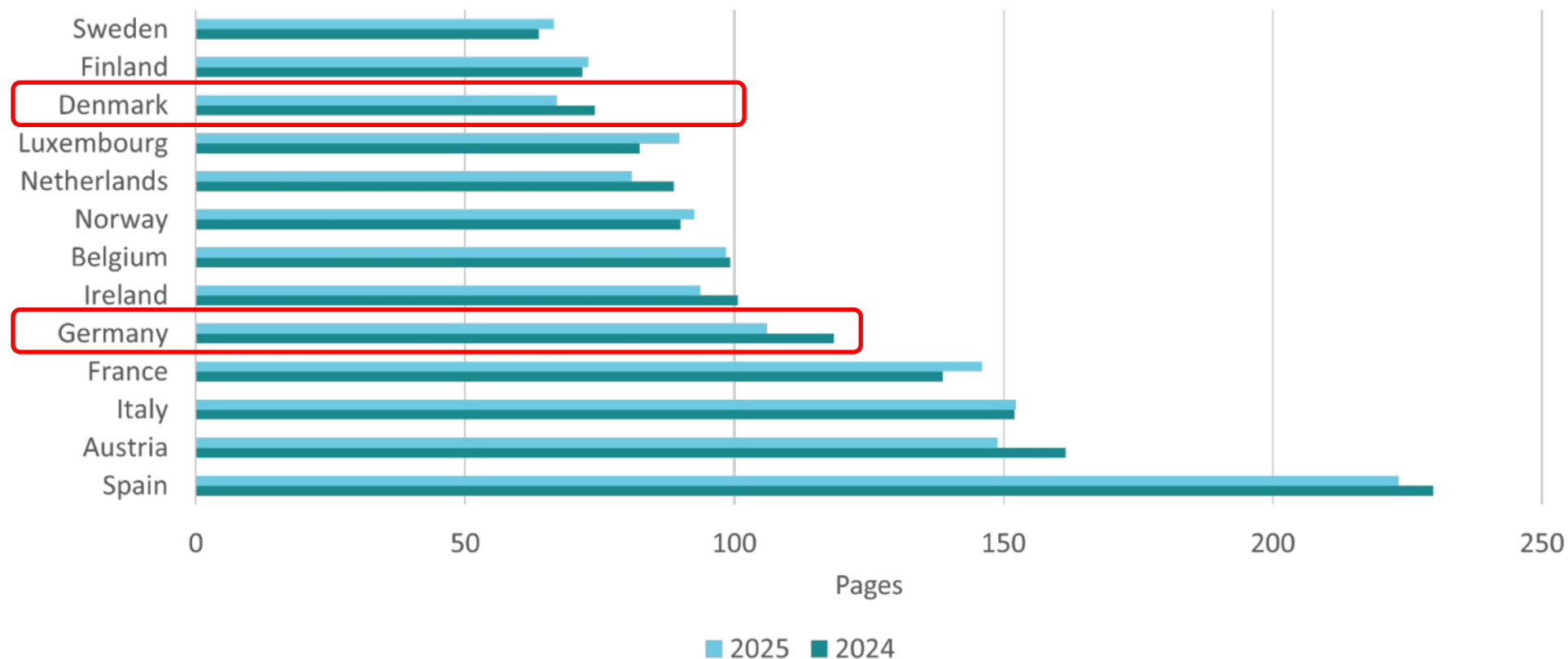
Plus hands-on support from experienced sustainability advisors

ARE DANISH REPORTS REALLY SHORTER?

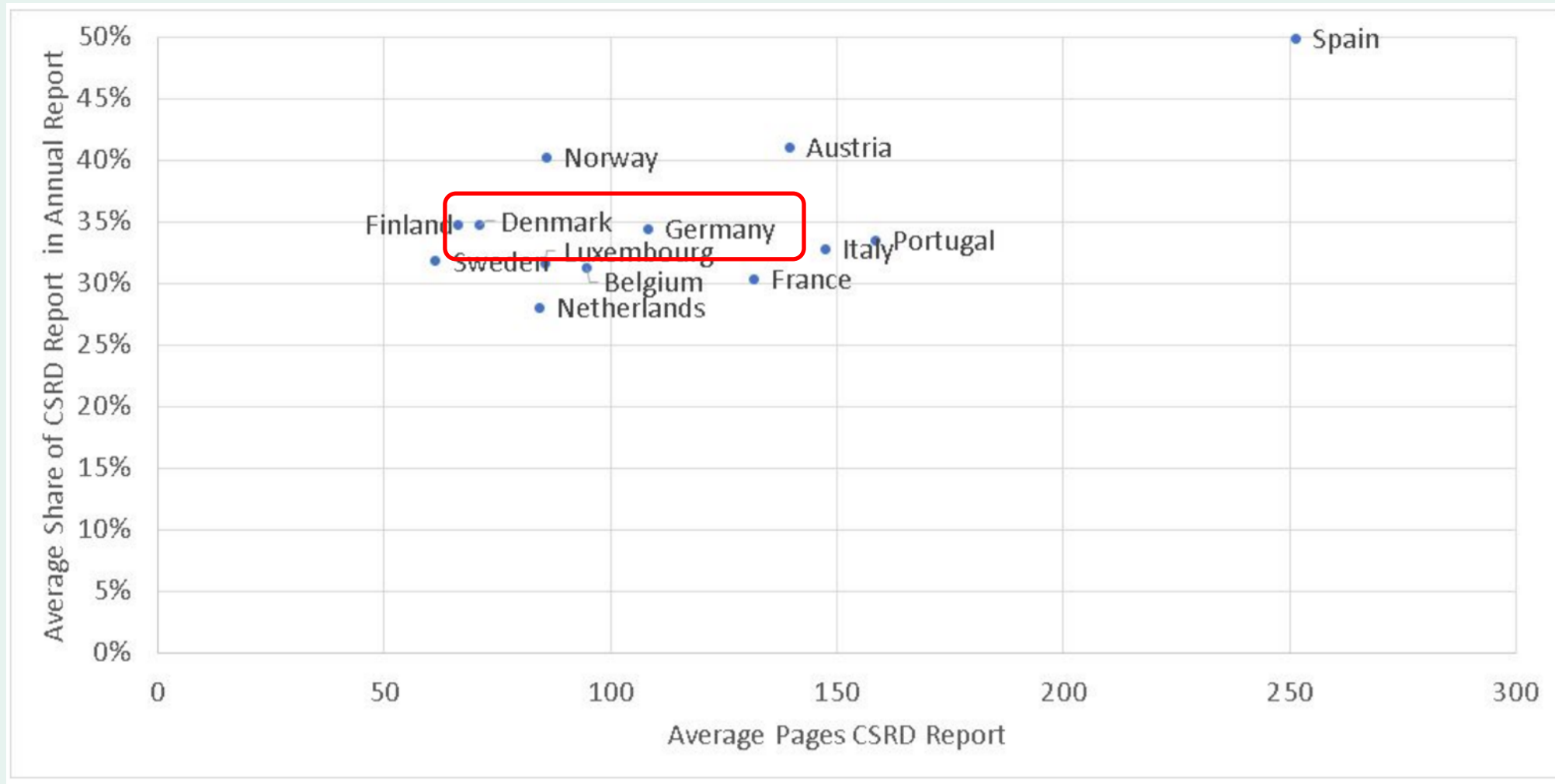
Yes, Danish reports are shorter than German reports

Reports were shorter in FY2025 in both countries

600 Firms reporting on FY 24 & 25



But both represent around 35% of the annual report
Suggesting Danish annual reports are shorter as well



**WHAT IS DRIVING
THAT DIFFERENCE?**

Novo Nordisk and Vestas have redefined ESRS reports

Most companies iterated in FY2025, they took a fundamentally different approach



Word count

-5%

71,000

-20%

47,000

-35%

25,000

Page count

-6%

124 pages

-21%

63 pages

-29%

38 pages

Compliance remained the baseline. Decision-usefulness became the filter that shaped reporting decisions.

Decision usefulness is a key concept in the draft simplified ESRS

Draft ESRS 1 Objective

3. The objective of the sustainability statement, taken as whole, is to present fairly (see Chapter 2) all the undertaking's material sustainability-related impacts, risks and opportunities and how the undertaking manages them. **The reported information shall be decision-useful for the users of general-purpose sustainability statements.**

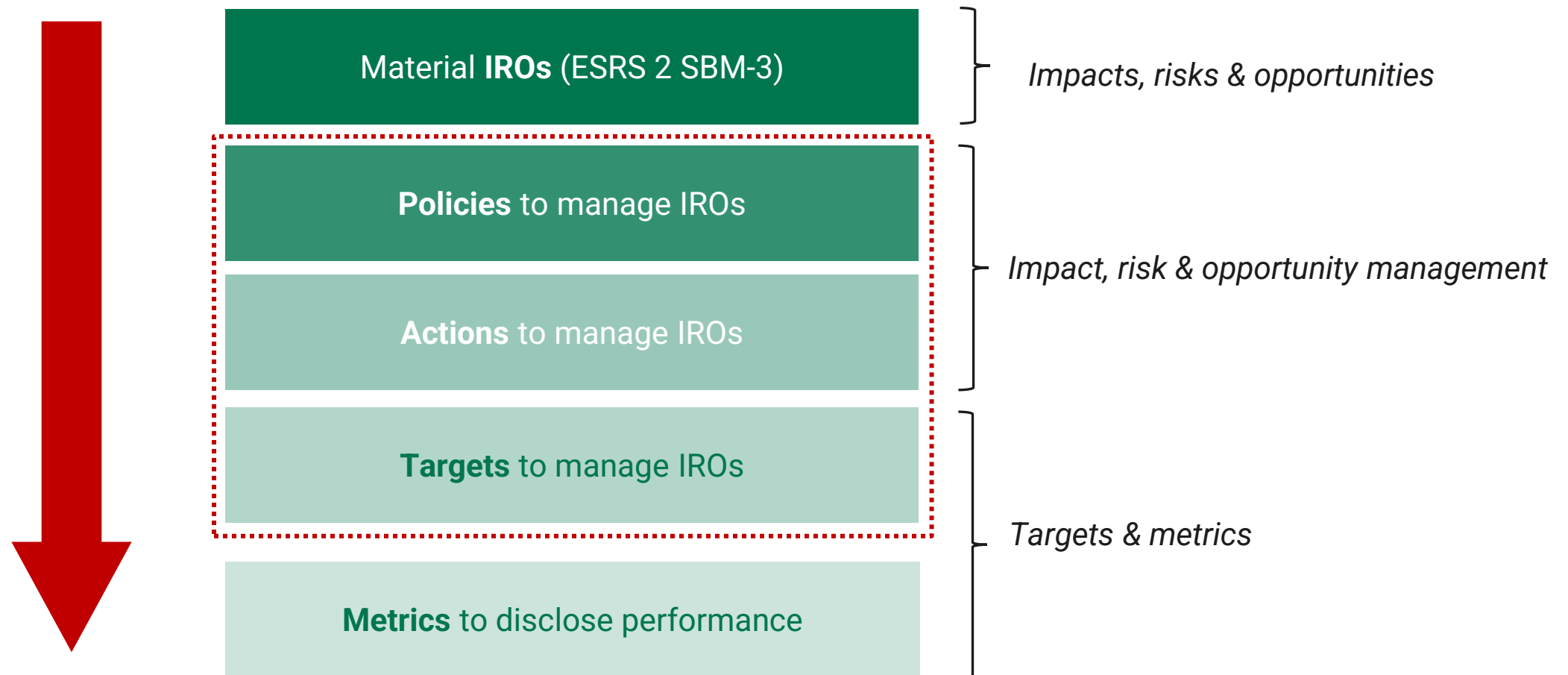
AR 1 for para 4:

- (b) consider the decision-useful information that groups of users need, without aiming to meet all the specific information needs of each individual user.

Both reports had a strong IRO “red thread”

Create a traceable chain to improve credibility, audit and decision-usefulness

IRO red thread



What did they remove?

Reduced

Result

Repetition



Better use of cross-references and incorporation by reference

ESRS boilerplate language



Shorter, stronger disclosures

Voluntary disclosures that did not improve decision-usefulness



Stronger focus on material information

Stand-alone initiatives and low-impact actions



Stronger focus on performance

TWO REPORTING INNOVATIONS

Prioritising S4, S1, E1 & E5 shifts structure to a **strategy-led narrative**

- S2 Workers in the value chain
- E3 E4 Nature
- E2 Pollution
- G1 Business conduct

- Innovation
- Social responsibility
- Patient protection

2. Patient protection and quality of life

Material impacts, risks and opportunities

As a pharmaceutical company, our end-users not only include the people we serve and our patients, but also clinical trial participants, healthcare providers and systems. While the following chapter primarily refers to patients, the IROs should be understood in the broader context of all our end-users. To address our patient-related sustainability matters, we have split the chapter into three connected sections, each addressing specific IROs. We take the point of departure in how we develop innovative treatments (*Innovation*) to support long-term health. *Social responsibility: prevention and access* covers the initiatives and programmes enabling those treatments to reach the patients who need them. *Patient protection* is the guiding principle throughout our operations, ensuring that safety and quality standards govern every stage from discovery to delivery.

Innovation

Novo Nordisk adds value to society and creates material positive impacts for people through discovering and developing innovative products to address unmet medical needs. As we continuously strive to set new standards for innovation through AI-supported R&D and digital technologies, we strengthen our ability to innovate, discover and create opportunities to improve the lives of patients.

Social responsibility: prevention and access

Novo Nordisk takes a comprehensive approach to social responsibility, combining preventive efforts with actions to improve the access to and affordability of our products. Defeating chronic diseases depends on tackling root causes, which is why we focus on prevention. With a focus on children and vulnerable populations, our initiatives have the potential to positively impact society and patients by improving health and wellbeing, and addressing shared risk factors across cardiometabolic diseases.

We remain committed to creating positive impact by expanding access to our products, improving affordability as well as supporting vulnerable populations and children with serious chronic diseases in low- and middle-income countries. Access is also central to our clinical enabling our clinical programmes to adequately represent the patient population affected by the diseases we study and treat. We recognise that persistent health inequities pose material reputational risks, and we continue to collaborate with relevant stakeholders, such as policymakers and health authorities, to expand access to affordable care.

Patient protection

Safeguarding patient safety and product quality is our highest priority. We strive to mitigate negative health impacts associated with clinical trial participation or marketed products. This includes our continuous fight against illicit trade to protect patients from serious health risks from counterfeit, diverted or illicitly compounded medicines.

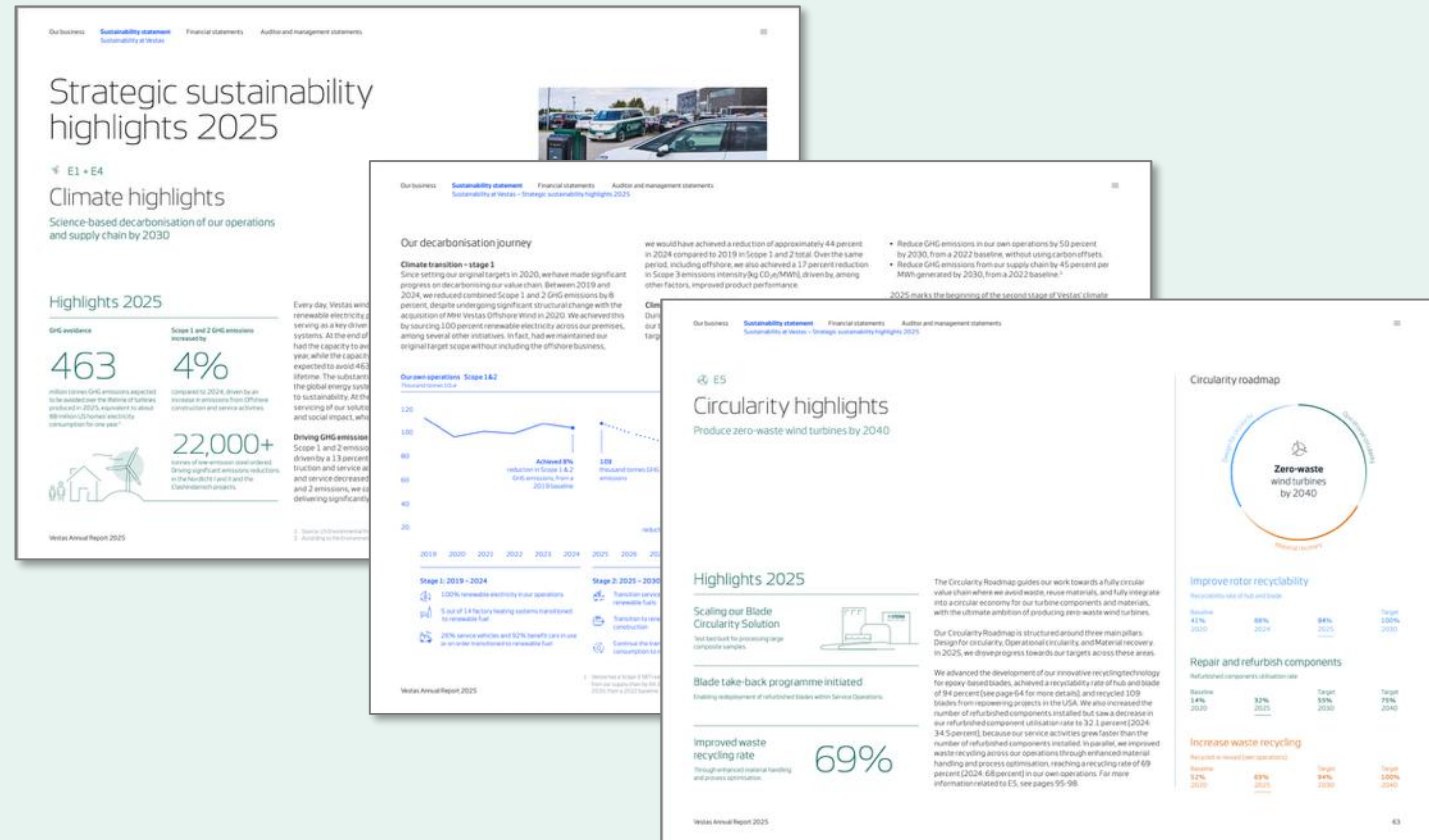
Protecting patients from information-related impacts, such as data privacy and adequate information, is central to our business. As we rely on health data in research and increasingly adopt AI in our operations, we remain committed to safeguarding personal data. We aim to provide transparent and responsible information on our products and clinical trials to support optimal treatment choices. Any failure to protect patients would represent both a material negative impact and a risk to Novo Nordisk's business and reputation. For this reason, we compromise on safeguarding patients from adverse impacts.

Vestas provided an 11-page executive summary

This guides the reader to what matters most, improving decision-usefulness

CONTENTS

- Sustainability strategy
- Highlights 2025:
 - E1 + E4
 - E5
 - S1 + S2 + S3
 - G1 + Cyber security
- Value chain
- DMA



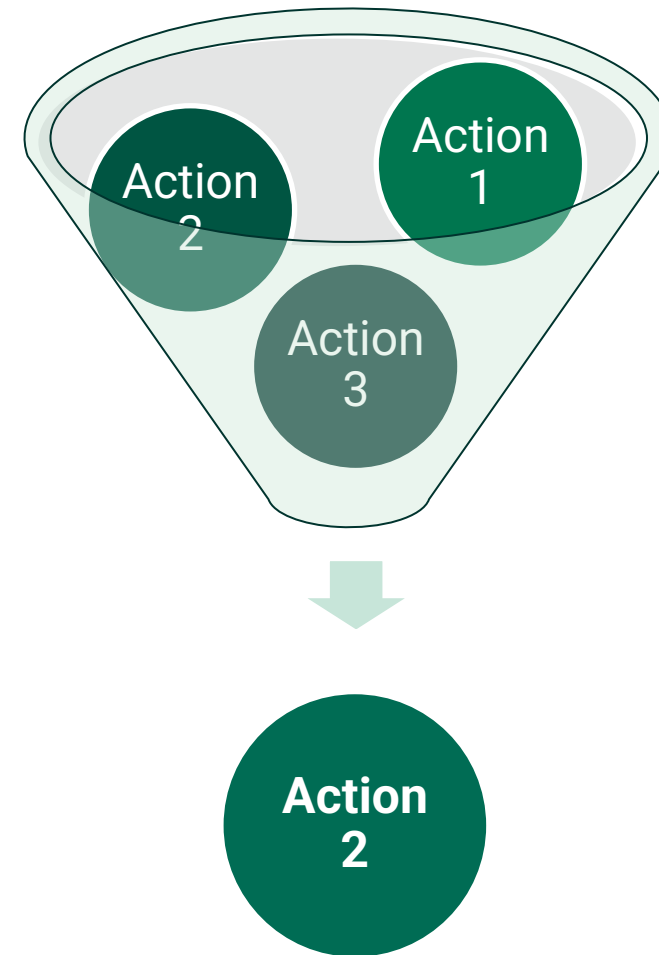
STRONGER PERFORMANCE NARRATIVE

Fewer actions: shift from activity reporting to performance

Novo Nordisk and Vestas reduced reporting of actions by ~20% year-on-year

Clear filters were applied:

- Only actions that are linked to IROs
- Actions must contribute to targets
- Removal of “standalone initiatives”



**HOW DID THEY GET THIS BY
THEIR AUDITORS?**

Both companies had extensive dialogue with their auditor



Was required to provide a clear DMA visual to clarify the prioritisation and ordering of topics, along with additional navigational cues to help readers orient themselves despite the non-standard ESRS structure.



Faced constraints in its executive summary: it could include only information already disclosed in the sustainability statement and had to present a balanced view, avoiding cherry-picked highlights.

Innovation within ESRS is possible, but it requires strong governance, clear rationale, and close collaboration with auditors.

**WHAT DOES THIS MEAN FOR
FY2026 REPORTING?**

Key trends for FY2026 reporting

The gap between compliance-focused reports and decision-useful reports will widen

- 1 Compliance remains the baseline. Decision-usefulness becomes the objective.
- 2 The DMA increasingly drives reporting priorities.
- 3 Sustainability statements become more management report-like.
- 4 Sustainability performance replaces activity reporting
- 5 Adoption of the simplified ESRS creates greater differentiation between reports.



Simon Taylor

Senior Director, Co-founder & Reporting Practice Lead

Position Green

<https://www.linkedin.com/in/simonphiliptaylor/>

Position Green[•]