Institute of Directors Ireland

forvis mazars

This briefing was produced by the Institute of Directors Ireland in association with Forvis Mazars for use in Ireland. Forvis Mazars is a leading international audit, tax, advisory and consulting firm. With over 900 staff across offices in Dublin, Galway, Limerick and Cork the Irish firm draws on the expertise of more than 40,000 professionals in over 100 countries to assist major international corporates, SMEs, financial institutions and public bodies to achieve their strategic and business goals.

# Briefing: CSRD: ‘Stop-the-clock’ Directive transposed into Irish Law

## INTRODUCTION

The Minister for Enterprise, Tourism and Employment has officially introduced in Ireland new rules that delay the application and clarify how the EU Corporate Sustainability Reporting Directive (‘CSRD’) applies in Ireland.

**The Statutory Instrument No. 309/2025 was published on the 11th July 2025 and introduced a number of key changes:**

- The S.I. postpones the application of the CSRD by two years for large companies (now for FY 2027) and for SMEs with securities listed on an EU regulated market, small and non-complex institutions, captive insurance and reinsurance undertakings (now for FY 2028).
- The S.I. modifies the definition of turnover relevant to the assessment of the size criteria under the CSRD scoping rules. The new definition removes the reference to revenue from “the making or holding of investments” for entities with such primary activities.
- The S.I. removes the automatic inclusion in scope for CSRD of ineligible entities that are defined under Schedule 5 of the Companies Act 2014. Now, an ineligible entity will adopt and comply with the CSRD only if it meets the standard size tests (in terms of revenue, total assets and employee numbers).
- The S.I. allows for a company that is part of a larger EU group to avail of the subsidiary exemption, if a group-level EU sustainability report is already prepared by its parent in line with CSRD requirements.
- The S.I. requires that an Irish subsidiary that is in scope for the CSRD itself, prepares a sustainability report in line with CSRD requirements at group level in situations where the group, headed by a non-EU parent undertaking, is generating more than €150 million in the EU for each of the preceding two consecutive years.

Institute of Directors Ireland
Indigo Building, Whitaker Square,
Sir John Rogerson’s Quay,
Dublin 2, D02 P2X8

+353 (0) 1 411 0010
info@iodireland.ie
iodireland.ie

Briefing prepared for
Institute of Directors Ireland

## WHAT'S COMING NEXT?

Sustainability reporting requirements continue to develop at the EU level.

- The European Commission has adopted a 'quick fix' for companies already presenting sustainability information in accordance with the CSRD. Targeted changes to the existing European Sustainability Reporting Standards would allow companies to continue to omit certain disclosures. This delegated act will come in force after publication in the OJEU.
- The European Financial Reporting Advisory Group ('EFRAG') Sustainability Reporting Board has approved its work plan for the revision of the sector agnostic ESRS. The first step in the workplan will cover reporting simplification, followed by consideration of stakeholder feedback.
- In addition to the Stop-the-Clock Directive, EU lawmakers are discussing a plan to simplify reporting rules and reduce the number of companies affected which will form part of what is referred to as the Content Directive, the second directive part of the Omnibus package.

**Further information is available from:**


**Laura Angelin**
Partner | Head of Sustainability Assurance
Langelin@mazars.ie

**Johnny Meehan**
Head of Sustainability Consulting
johnny.meehan@mazars.ie