CSRD Adoption in the DAX40: A Second-Year Assessment

Evidence from the DAX40 (April 2026)

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Executive Summary

- We examine **changes in sustainability reporting between the first and second year** of CSRD application for DAX 40 firms.

- On average, 2025 reports are **slightly shorter** than 2024 reports (total words -5%). Firms with very long 2024 reports shorten the most (-10%).

- Volume changes **differ across topics**: While firms slightly expand environmental disclosures, on average, they reduce social and other (redundant) disclosures.

- Only few use quick-fix reliefs or restructure their reporting significantly. Many firms improved reporting quality through **restatements and streamlining**.

- These findings are comparable with those of the **EURO STOXX 50**.

Motivation and Context

- ESRS constitute the most comprehensive mandatory ESG reporting regime globally. Wave 1 firms have now completed their **second** full reporting year.
- This study **updates** our analysis of 2024 DAX40 reporting and complements our early evidence on the first 100 ESRS reports for 2025.
- It also complements our pre-registered **EU-wide study *Targeting Transparency***, which tracks disclosure changes for ~1,000 EU firms vs. Non-EU peers.
- The second reporting year coincides with the EU's **Omnibus changes**, which significantly narrow ESRS scope and requirements. This makes 2025 baseline evidence particularly policy-relevant: it documents what large listed firms actually disclose under the current regime, before any simplification takes effect.

Data and method

- Data:
  - We use the DAX40 (December FYE) CSRD reports from our report repository.
  - Our analyses are based on these firms' sustainability statements for 2024 and 2025.
  - Appendix A provides a list of companies and a breakdown of industries covered.

- Method:
  - Topic classification: We classify environmental and social text using automated topic-classification algorithms (Environmental and Social BERT; see Donau et al. 2025).
  - Text characteristics: We analyze sentiment, complexity of words, use of tables, numbers, and images, sentence redundancies.
  - Restatements: We identify restatements using keyword-searches (e.g., restatement)
  - Report structure: We identify structure changes by changes in topic-positioning.

Reports shortened slightly in 2025 after growing by 30% last year

Report Volume Average and Median by Year

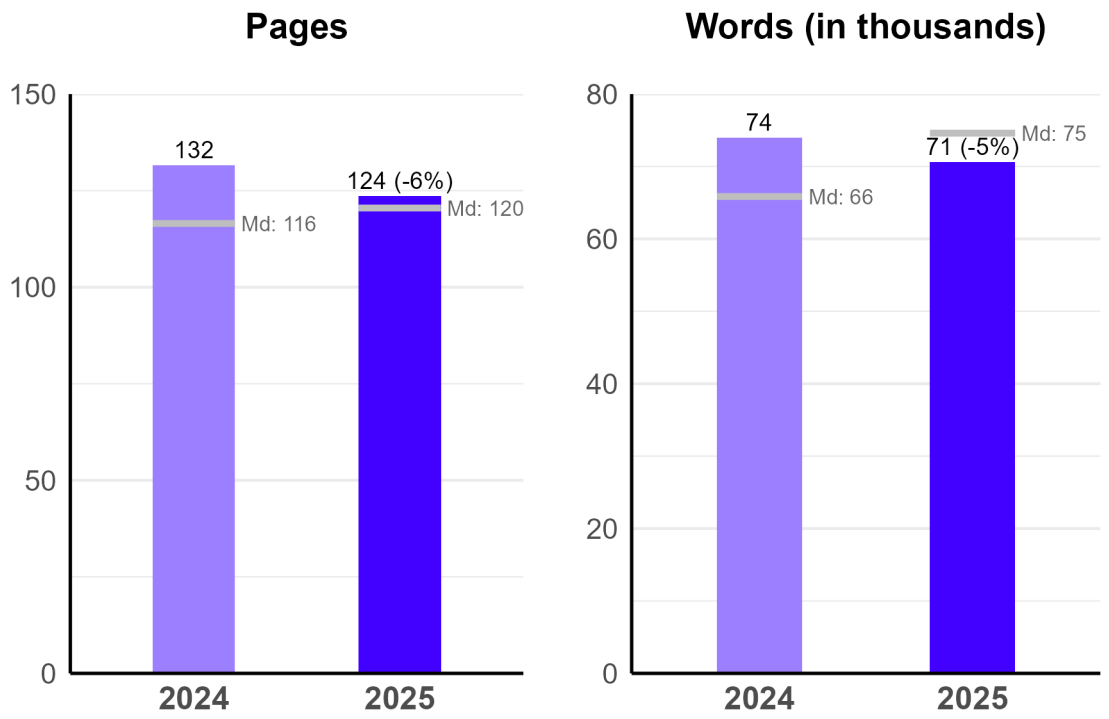

Fig 1. Change in reporting volume. This figure shows the average (median in a grey solid line) number of pages (left panel) and words (right panel) for firms' 2024 and 2025 sustainability statements. The differences between the years are not statistically significant.

Report length continues to vary substantially

Report Volume by Firm and Year

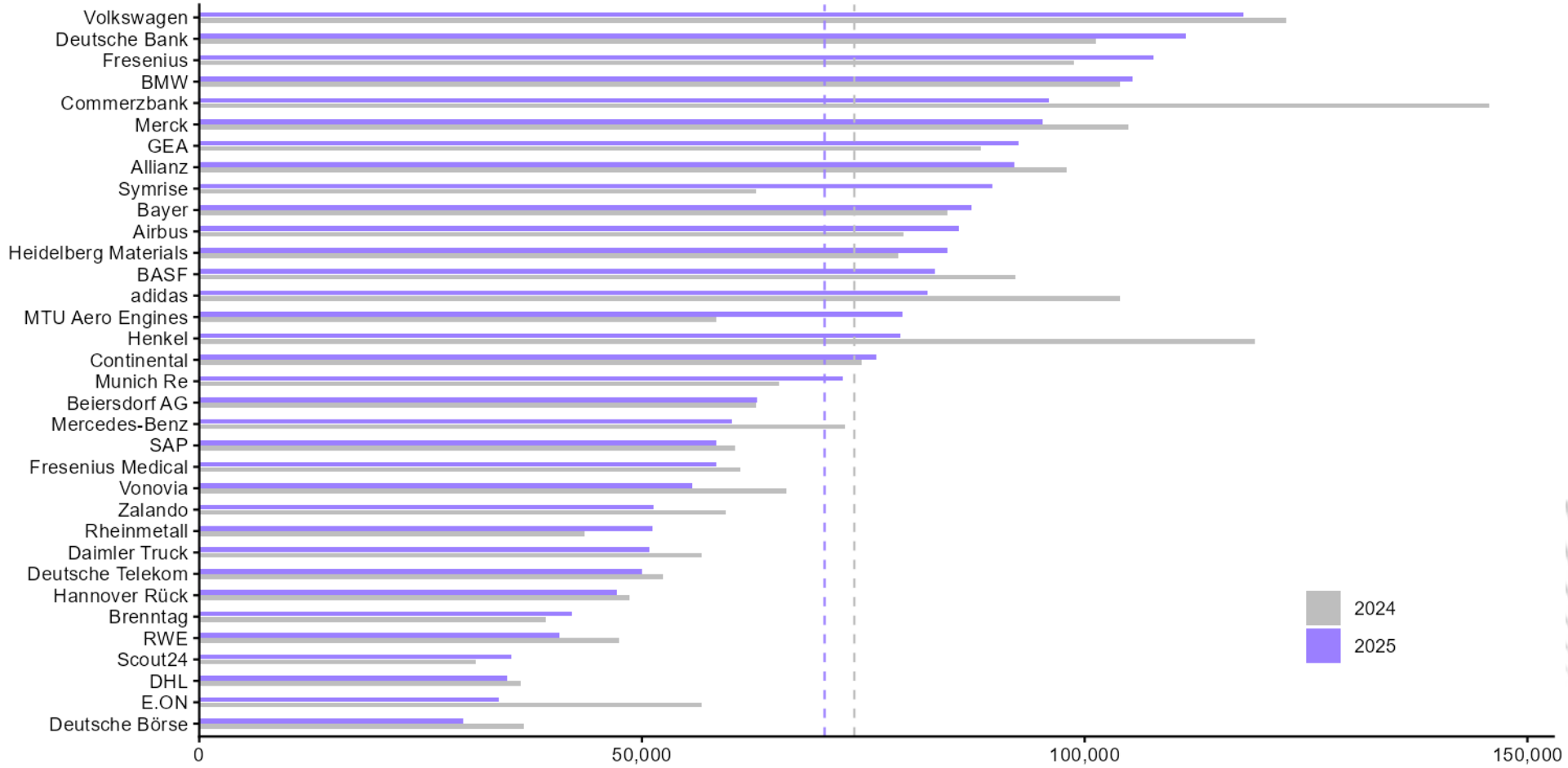

Fig 2. Total reporting volume. This figure shows the absolute length of sustainability reporting for each firm in 2024 and 2025 measured in number of words. The dashed lines indicates the sample averages.

Volume reductions driven by firms with the longest 2024 reports

Report Volume Average by Reporting Length Tercile in 2024 and Year

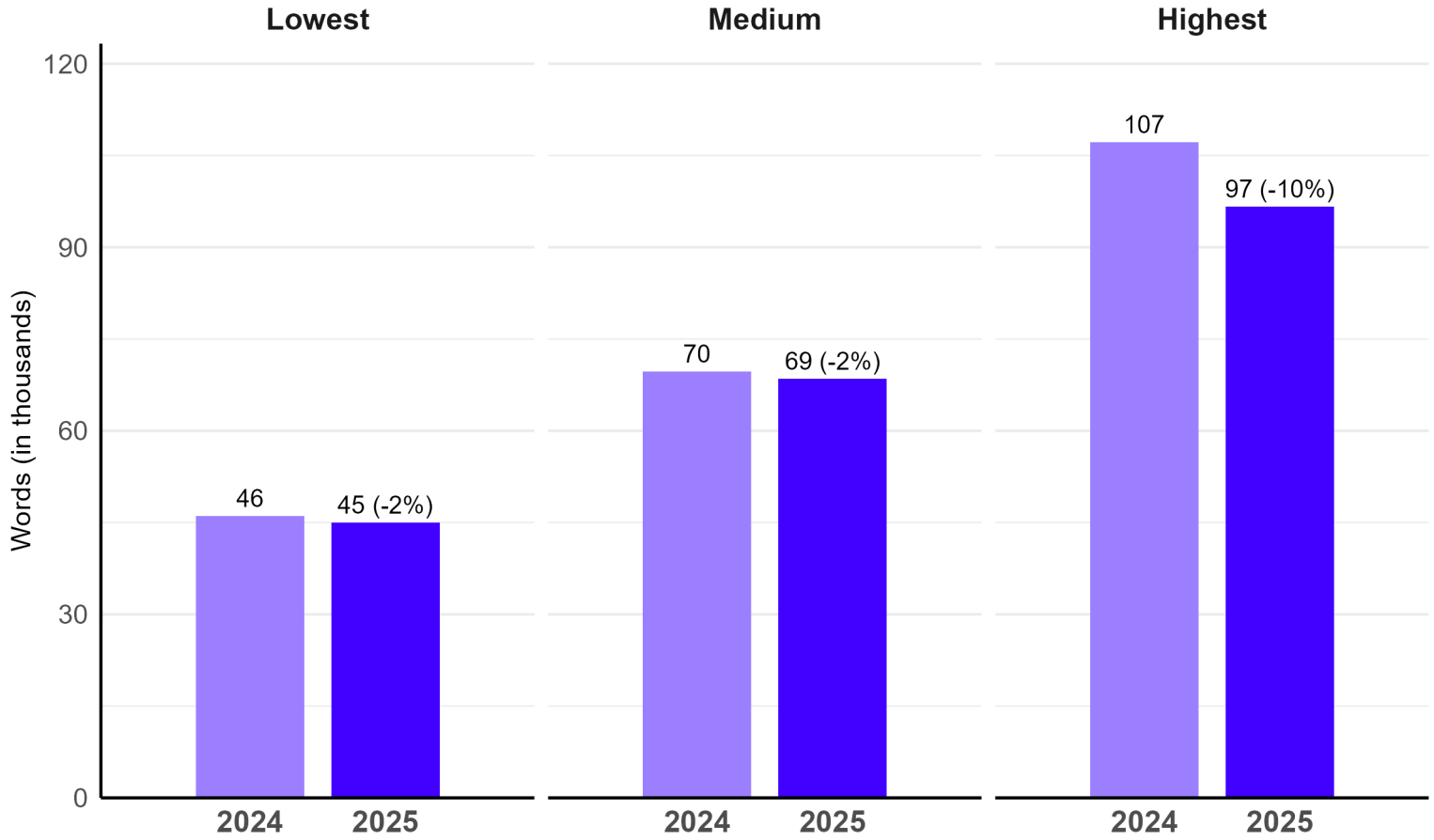

Fig 3. Reporting volume by 2024 levels. This figure shows the average number of words based on low, medium, and high 2024 reporting levels.

Environmental content keeps growing, Social and other decline

Topic Share Averages by Pillar and Year

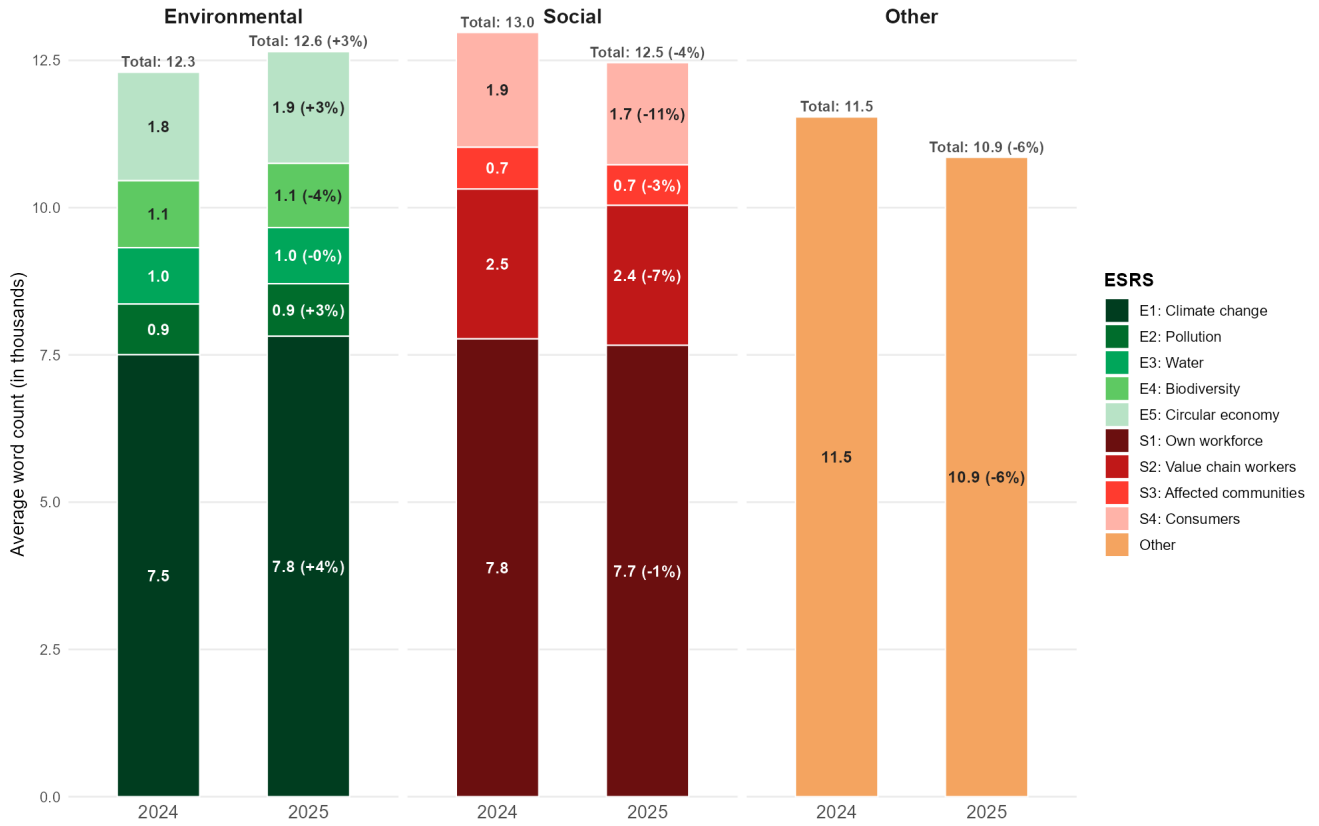

Fig 4. Reporting volume by ESRS standard. This figure shows the average number of words in 2024 and 2025 per ESRS standard based on sentence-level topic classification using Environmental and Social BERT (Donau et al. 2025) The "Other" category includes governance topics, cross-cutting standards, and unclassified sentences. Word counts reflect sentence-level extraction and may differ from total document word counts due to pre-processing and cleaning steps (e.g., stop words are dopped in BERT).

Reported disclosure requirements are still shifting

Disclosure Requirements – Examples

Mercedes: -17 DRs

Disclosure requirement	
Social information, ESRS S2 – Workers in the value chain	
ESRS 2.17	Application of the simplification "Quick Fix" related to value chain workers
Social information, ESRS S3 – Affected communities	
ESRS 2.17	Application of the simplification "Quick Fix" related to affected communities
Social information, ESRS S4 – Consumers and end-users	
ESRS 2.17	Application of the simplification "Quick Fix" related to consumers and end-users

Mercedes, 2025 p. 218

Large *decreases* due to Quick Fix phase-ins

Beiersdorf: +13 DRs

Changes in the Preparation or Presentation of Sustainability Information

In the 2025 NFS, we included additional information and metrics that were not previously reported in order to align our reporting more closely with the ESRS requirements. Compared to the previous year, this has resulted in changes to the presentation and addition of sustainability information in individual chapters, including ESRS E1, ESRS E5, and ESRS S1. For example, the key figure tables in chapters ESRS E1 and ESRS E5 have been restructured or supplemented.

Any other methodological changes in the reporting period resulting in adjustments to or recalculations of metrics (e.g., new scientific findings such as the "Intergovernmental Panel on Climate Change" (IPCC) reports) are also explained at the appropriate points in the report (chapters ESRS E1, ESRS E5, ESRS S1, and ESRS S2).

Beiersdorf, 2025 p. 49

Large *increases* are caused by transition to full application

Fresenius: -5 DRs

As a result of the update of the materiality analysis, changes occurred regarding material IROs and the corresponding disclosure requirements: no IRO related to other work-related rights of own workforce was assessed as material. Therefore, this sub-topic, including the sub-sub-topics Adequate Housing, Child Labor, and Forced Labor, will no longer be reported under topical standard S1 Own workforce. The Group approach to Privacy remains unchanged and is described in topical standard S4 Consumers and end-users, which also covers own workforce. Likewise, no material IRO was identified for the sub-sub-topic Social Protection. Accordingly, disclosure requirement S1-11 will no longer be reported. Furthermore, no IRO related to Supplier Relationships, including Payment Practices, was assessed as material. Disclosure requirements G1-2 and G1-6 will therefore no longer be reported. Due to a new material risk concerning product safety and supply risks in connection with compliance with regulations in global healthcare markets, corresponding company-specific disclosures will be provided in the reporting year (Section Resilience and compliance in global supply chains, topical standard G1).

Fresenius, 2025 p. 177

Changes based on different materiality assessments

Few use quick-fix reliefs and if they do, some info is still disclosed

Transitional Relief Usage

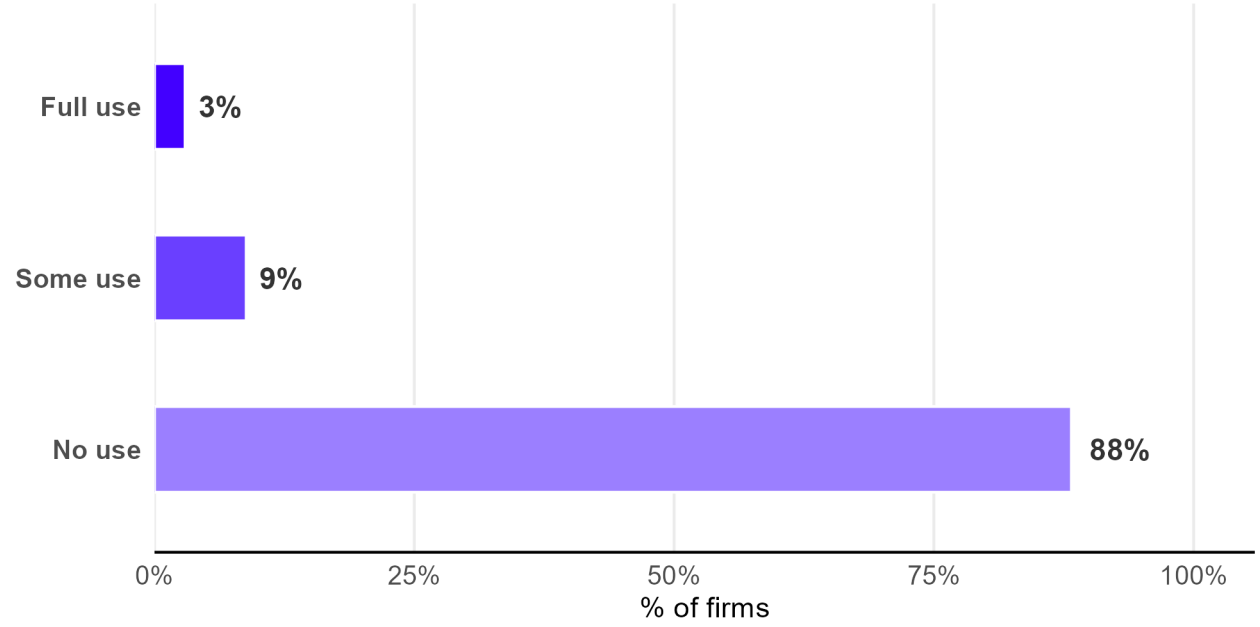

Fig 5. Quick-fix usage. This figure shows the percentage of firms using a quick-fix transitional relief for S2, S3, and/or S4.

Streamlining through fewer redundancies, more tables & numbers

Textual characteristics

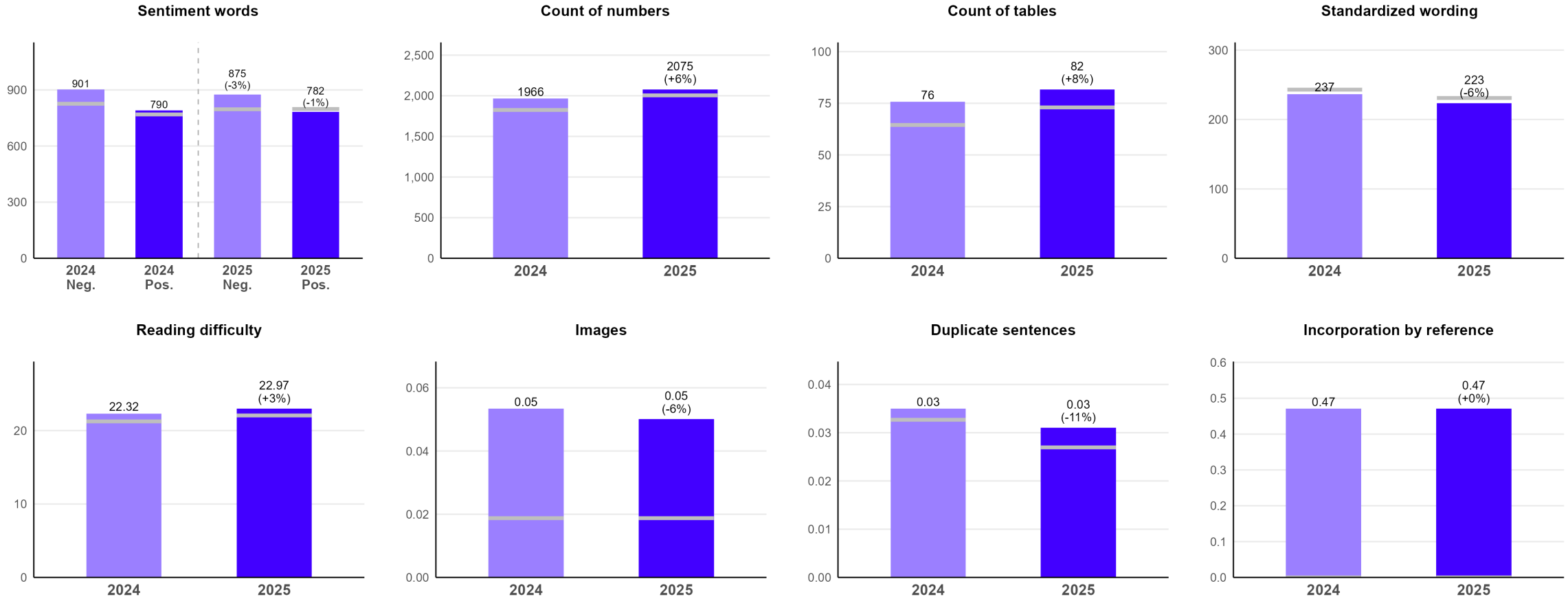

Fig 6. Textual attributes. This figure shows the comparison of textual attributes for 2024 and 2025. The grey line indicates the median. Sentiment is based on positive and negative words from Loughran and McDonald (2011), Count of numbers and Count of tables are based on automated PDF layout extraction, Standardized wording is the count of frequently used tetragrams, Reading difficulty is the Fog–Index, an aggregate measure of readability where higher values indicate higher sophistication, Images is the share of pages that is filled with images, Duplicate sentences is the share of repeated sentences within the sustainability statement. Incorporation by reference shows the share of firms using incorporation by reference. For count of numbers, count of tables, images and duplicate sentences we remove the two highest values as outlier treatment.

Only few firms substantially restructure their reporting

Structure changes (Topic order stability)

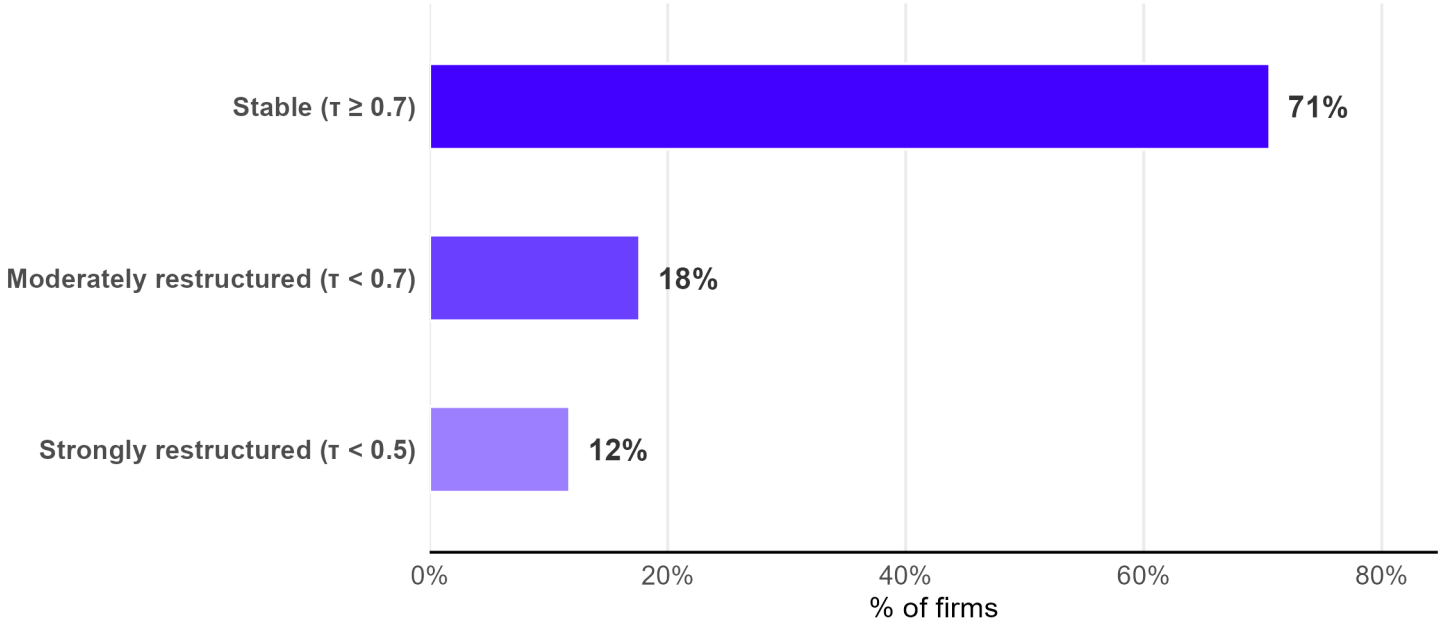

Fig 7. Structure changes across firms. This figure shows topic order stability (Kendall's τ) across firms based on the average sentence position of each ESRS topic in 2024 and the corresponding position in 2025. A τ of 1 indicates an identical topic ordering across both years, while −1 indicates a fully reversed order. Firms are classified as stable (τ ≥ 0.7), moderately restructured (τ < 0.7), or strongly restructured (τ < 0.5).

More firms report restatements, esp. for emission-related data

Firms with restatement-related keywords

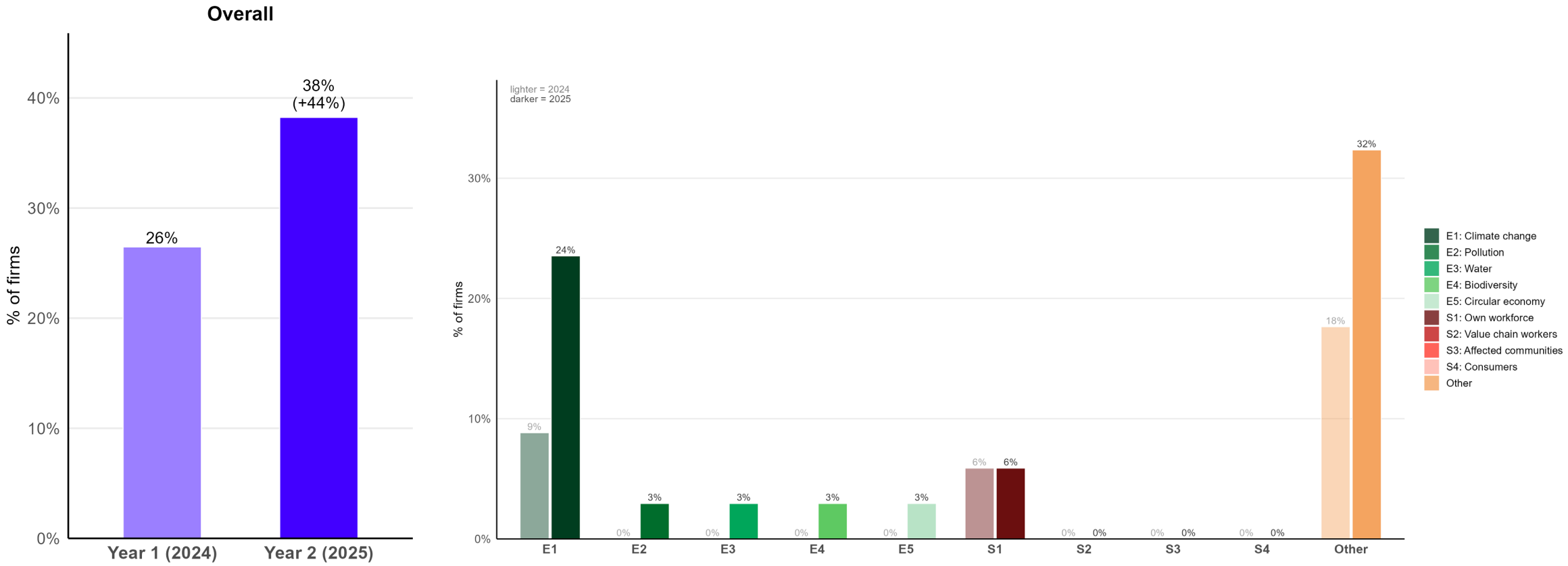

Fig 8. Restatements. This figure shows the share of firms that use restatement-related keywords in 2024 and 2025 (on the left) and split into the different ESRS standards (on the right). Restatements are identified via keyword search using the following word stems: *restate, recalculat, reclassif, correct, and revis.*.

Most restatements refer to updated calculation methods

Restatements – Examples

Bayer E1: Scope 3 Emissions

Changes in preparation or presentation of sustainability information

In 2025, changes were undertaken in the calculation of Scope 3 greenhouse gas emissions. As part of the Science Based Targets initiative (SBTi) revalidation process, we examined all parts of our upstream and downstream value chain to identify additional greenhouse gas emissions. This process identified greenhouse gas emissions in six new Scope 3 categories. The additional categories are included in our reporting and our SBTi target for the reduction of Scope 3 greenhouse gas emissions beginning in 2025. In addition, we have adjusted our calculation methodology in certain categories. For further information, please see the sections "Targets related to climate change mitigation and adaptation [E1-4]" and "Greenhouse gas emissions of Scope 1, 2 and 3 and total greenhouse gas emissions [E1-6]" in Chapter 4.2.2 Climate Change. We also further developed the modeling of biogenic Scope 2 CO_2 emissions in 2025. To ensure consistency between the calculation of biogenic and nonbiogenic Scope 2 CO_2 emissions, in the future we will also use data from the International Energy Agency to calculate biogenic Scope 2 CO_2 emissions. For more information and the restated figure for 2024, please see the section "Greenhouse gas emissions of Scope 1, 2 and 3 and total greenhouse gas emissions [E1-6]" in Chapter A 4.2.2 Climate Change.

Heidelberg Materials E3: Water

The increase in water withdrawal and discharge volumes compared with the previous year is due to the commissioning of the CCS plant in Brevik, for which water is withdrawn from the North Sea for cooling and then returned. However, this did not increase the plant's water consumption. In addition, a water withdrawal and discharge flow for one plant was not recorded in 2024. This had no influence on consumption, as the withdrawal and discharge were the same. At another plant, a change in water accounting methodology was made, which had an impact on the withdrawal and discharge of surface water and thus also influenced water consumption. The 2024 values were adjusted retroactively.

International development is comparable

EURO STOXX 50 also show most decreases in other topic, but no increase in E1

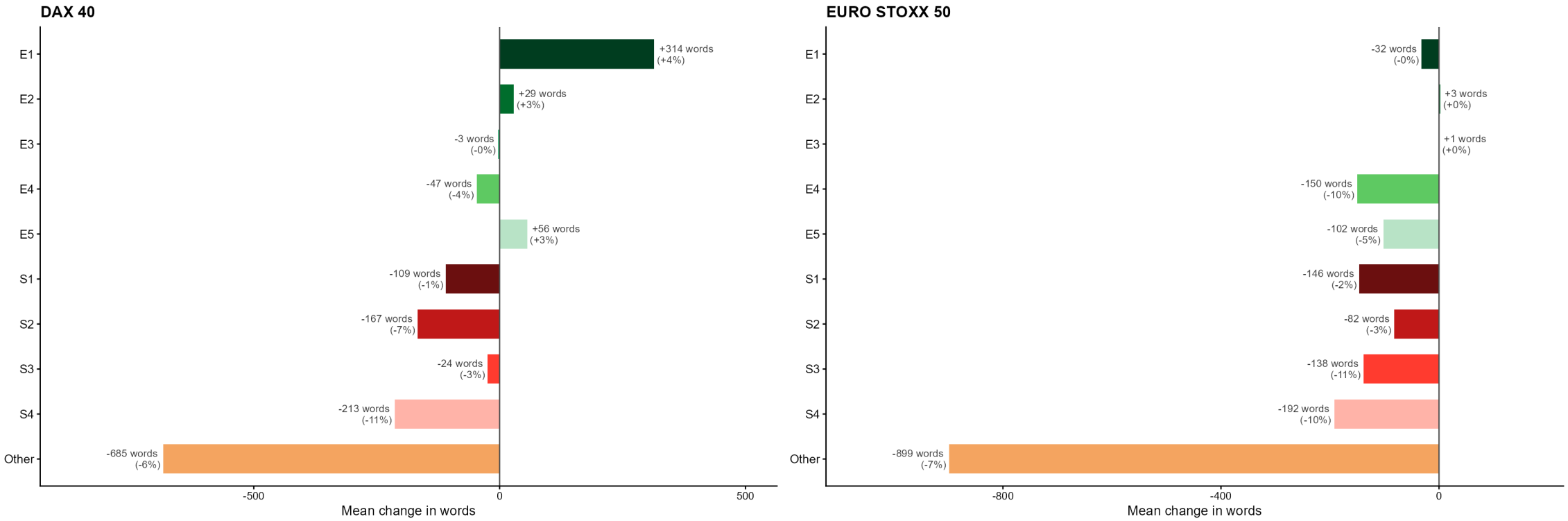

Fig 9. Changes in ESRS word counts by stock index. This figure shows the average changes in word counts per ESRS standard (based on the BERT topic shares) for the DAX 40 firms (left) and EUROSTOXX 50 firms (right).

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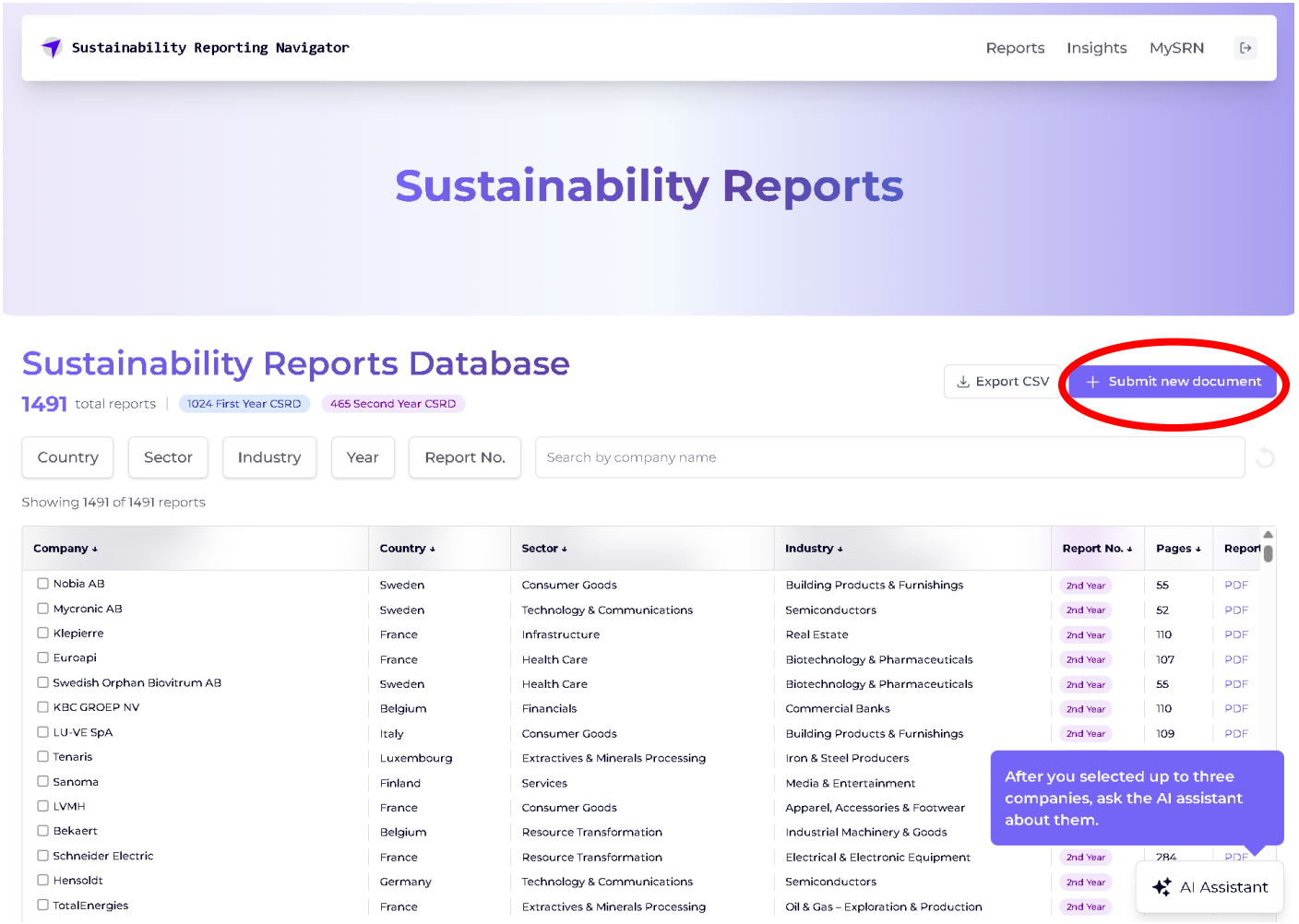

About the Sustainability Reporting Navigator

- Founded by researchers at Goethe University Frankfurt (Katharina Hombach), the University of Cologne (Maximilian A. Müller), and Ludwig-Maximilians-University (LMU) Munich (Thorsten Sellhorn and Victor Wagner), the Sustainability Reporting Navigator (SRN) is an Open Science Platform dedicated to supporting practice, policy-making, and academic research.

- It is supported by the German Research Foundation (DFG grant No. 403041268), the BMW Foundation Herbert Quandt, TÜV Süd Foundation, and accounting firms BakerTilly, Curacon, Forvis Mazars, KPMG, and PwC.

- Its AI-enhanced CSRD Report Search Engine has made the SRN a key resource for in-depth analysis and benchmarking of CSRD reporting for preparers, auditors, policy-makers, academics and other stakeholders.

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Sustainability Reporting Navigator

How this analysis relates to other studies on 2025 ESRS reports

Our analyses complement those provided by the DRSC and Deloitte in the following ways:

- Our **focus on the DAX40** — Germany's largest listed companies — provides a systematic, in-depth view of the most prominent blue chips that set the reporting benchmark for the broader German market.
- **Disclosure content:** Our ES-BERT topic classifier (Donau et al., 2025) tracks disclosure content at the sentence level — showing precisely which topics expand, contract, or disappear between 2024 and 2025.
- **Qualitative report attributes:** We analyze how firms write — examining readability, quantification, redundancy, and structural consistency — providing a rich picture of reporting maturity beyond volume and topic counts.
- **Restatements:** We systematically identify firms that revise prior-year figures and document the topics and methods involved, shedding light on data quality and methodological convergence across the sample.
- **International benchmark:** By applying the same methodology to the EURO STOXX 50, we situate DAX40 developments in a broader European context.

In summary, the DRSC/Deloitte analysis provides the widest structural lens across German indices; our study delivers the **deeper, text-based, methodologically grounded account** of how Germany's largest firms are evolving their ESRS reporting in substance.

Appendix A: Reports used

adidas	Daimler Truck	MTU Aero Engines
Airbus	Deutsche Bank	Mercedes-Benz
Allianz	Deutsche Börse	Merck
BASF	Deutsche Telekom	Munich Re
BMW	E.ON	RWE
Bayer	Fresenius	Rheinmetall
Beiersdorf AG	Fresenius Medical	SAP
Brenntag	GEA	Scout24
Commerzbank	Hannover Rück	Symrise
Continental	Heidelberg Materials	Volkswagen
DHL	Henkel	Vonovia
		Zalando

sector	#	Percent
Consumer Goods	4	11.76
Extractives & Minerals Processing	1	2.94
Financials	6	17.65
Health Care	4	11.76
Infrastructure	3	8.82
Resource Transformation	7	20.59
Technology & Communications	3	8.82
Transportation	6	17.65