

OPINION

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German Property Federation (ZIA)

Consultation on the European Commission's recommendation for a standard on voluntary sustainability reporting

The German Property Federation (ZIA) generally supports the European Commission's initiative to establish a standardised and comparable framework for the voluntary sustainability reporting of small and medium-sized enterprises.

ZIA expressly welcomes the objectives of this draft. The real estate industry, as a heterogeneous sector comprising numerous mid-sized companies is confronted with fragmented, uncoordinated, and overlapping data requests from clients, lenders, and investors within the scope of the Corporate Sustainability Reporting Directive (CSRD). This generates a disproportionate administrative burden to the actual benefit generated. Formalizing the value chain cap as agreed upon by the co-legislators as part of the Omnibus I in December 2025 is a significant step to reduce the risk of disproportionate compliance burdens being passed down the supply chain while. The draft standard therefore constitutes an important protective instrument that corresponds to long-standing ZIA advocacy positions.

For the real estate industry, the proposed Voluntary Standard represents a reasonable starting point, particularly for micro-enterprises and small businesses. However, any additional external audits for voluntary reports should be waived. It is already industry practice to validate key consumption data and ESG metrics multiple times by external service providers.

Against this background, ZIA calls for a swift implementation of the simplification measures aimed at simplifying sustainability reporting. It offers an opportunity to reduce reporting requirements while making disclosure obligations more efficient, coherent, and practical. This applies in particular to those companies falling outside the scope of the CSRD while still needing to provide reliable ESG data to banks, investors, and business partners.

For the real estate sector, the priority is therefore not the development of additional sustainability reporting standards, but rather the establishment of best-practice examples for data structures, methodologies, and process design. In that regard, we encourage market participants to treat the Voluntary Standard as the maximum requirement for data points, with only minimal divergence allowed to reflect industry-specific reporting obligations (e.g. banking requirements).

Contact

Marianne Pieper

Policy Officer Energy and Climate Change Policy
& Sustainability

Florian Hesse

EU Policy Officer

Tel.: +32 2 550 16 15

Email: florian.hesse@zia-europe.eu

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The German Property Federation (ZIA) is the leading umbrella association for the property sector. With its registered office in Berlin and a European office in Brussels, it speaks through its about 400 members, including 30 associations, on behalf of approximately 37,000 industry companies right across the value chain. ZIA provides comprehensive, unified representation for the interests of the real estate sector in all its diversity at both national and European level, including as a member of the Federation of German Industries (BDI) and the German Economic Institute (IW). The President of the association is Iris Schöberl.

ZIA Zentraler Immobilien Ausschuss e.V.

Berlin Office

Leipziger Platz 9
10117 Berlin

Telefon: +49 30 | 20 21 585 – 0

Email: info@zia-deutschland.de

Website: <https://zia-deutschland.de>

Brussels Office

3 rue du Luxembourg
B-1000 Brüssel

+32 | 2 550 16 14

German Lobby Register: [R002399](#)

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