



February 18, 2026

Letter of Intent

Establishing an EU-wide digital solution for standardized sustainability reporting

Dear Members of the European Commission, the European Parliament and EFRAG,

On behalf of the undersigned European and national industry and other professional associations, we are pleased to submit this Letter of Intent expressing our shared commitment to supporting the effective implementation of sustainability reporting in accordance with the Voluntary Sustainability Reporting Standard for SMEs (VSME).

SMEs form the backbone of the European economy and play a crucial role in achieving the EU's objectives and long-term competitiveness. We welcome the development of the VSME as a coherent, pragmatic, and SME-oriented framework that enables companies to respond to growing sustainability information needs from value chains, financial institutions, and other stakeholders. At the same time, experience from Member States clearly shows that the effective and broad uptake of voluntary sustainability reporting by SMEs depends not only on the availability of standards, but critically on the existence of support mechanisms and a unified and digitally enabled implementation framework at EU level. Fragmented national approaches and parallel tools risk undermining comparability, increasing administrative burdens, and limiting the practical usefulness of sustainability reporting for SMEs operating in the Single Market. The Omnibus Initiative and the corresponding timeline adjustments provide a special timeframe for coordinated action.

Against this background, we strongly support the **establishment of an EU-wide digital solution for standardized sustainability reporting, designed as a common European infrastructure and entry point for SMEs**. Such a solution should scale well-established, publicly funded national tools, and governance structures that have already proven their effectiveness in practice. National solutions such as the [Sustainability Code](#) (Deutscher Nachhaltigkeitskodex, DNK) demonstrate how practical guidance, digital reporting platforms, and institutional support structures can significantly lower entry barriers for SMEs, enhance data quality and transfer, and foster credibility and comparability of sustainability information. With more than 4,450 registered companies and 7,500 users, the DNK offers both free support for sustainability reporting (incl. XBRL format) for SMEs and a centralised database facilitating the secure transfer of sustainability information to stakeholders such as banks. Leveraging the DNK digital reporting tool and database into a common EU framework would allow the European Union to capitalise on existing public investments and expertise, avoid duplication of efforts, and accelerate the consistent implementation of the VSME across all Member States, supported by EU co-financing.

We believe that industry and other professional associations, in close cooperation with established national sustainability reporting initiatives, are well positioned to act as partners, multipliers, and feedback channels within such an EU framework. We therefore stand ready to engage constructively with the European Commission, the European Parliament and EFRAG, and other relevant stakeholders to co-develop, pilot, and scale a unified European digital solution that enables SMEs to create added value through sustainability reporting, not additional administrative burden.

This Letter of Intent reflects our shared ambition to contribute to an EU-wide digital solution for standardized sustainability reporting, firmly rooted in national best practices such as the DNK and fully aligned with the objectives of the Single Market.

Key benefits at a glance

- Creating an EU-wide standardized digital support solution for SMEs
- Governance mechanism ensuring EU-wide consistency and comparability (European core with multi-tenant architecture), while allowing national adaptations and country-specific hosting
- Saving time, effort and resources for EU member states (establishing support systems) and their companies (bureaucracy reduction and efficient sustainability reporting)
- One-Stop-Shop: A single platform where all sustainability-related requests (e.g. from financial institutions or business partners) are addressed through the VSME reports as value chain cap
- Establishing an EU-wide public data base for SME sustainability data

We would welcome the opportunity to further discuss how existing investments and expertise of the DNK can be capitalised on and scaled up to serve as a common, harmonised digital solution for other already interested EU countries.

Yours sincerely,

On behalf of the undersigned European and national industry and other professional associations



Jacob Sylvester Bilabel

Founder and Managing Director, Aktions-
netzwerk Nachhaltigkeit in Kultur und Medien



Daniela Wallikewitz

Executive Director,
Arbeitsgemeinschaft ASEW c/o VKU



Felix Pakleppa

Director General, Zentralverband Deutsches
Baugewerbe (ZDB)



Thomas Möller

Managing Director, BAUWIRTSCHAFT
BADEN-WÜRTTEMBERG E.V.



Dr. Claudia Conen

Secretary General, Bundesverband
Deutscher Leasing-Unternehmen e.V. (BDL)



Kathrin Jäckel

Managing Director, Bundesverband
Naturkost und Naturwaren (BNN) e.V.



Sven Liebert

Secretary General, Bundesverband der
Deutschen Tourismuswirtschaft e. V. (BTW)



Markus Luthe

Chief Executive Officer, Hotelverband
Deutschland (IHA) e.V.



Dr. Uwe Mazura

Managing Director, Gesamtverband
der deutschen Textil- und
Modeindustrie e.V.



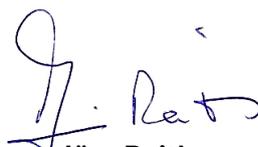
Dr. Bastian Wens

Managing Director, Interessengemeinschaft
der Thermischen Abfallbehandlungsanlagen
in Deutschland (ITAD) e.V.



Thilo Brodtmann

Executive Director,
VDMA e.V.



Jörn Raith

Chairman of the Management Board,
degefest e.V. - Verband der Kongress- und
Seminarwirtschaft