

Ref: 2002/109/LetterEP_200302
Contact: Natascha Waltke

20 March 2002

THE SECRETARY GENERAL

Dear Member of the European Parliament,

Re: draft report on the Commission Green Paper on promoting a European framework for corporate social responsibility

UNICE is very concerned about the approach advocated in the draft report on corporate social responsibility currently being discussed in the EP and the stance that the EP is recommended to take in the debate.

In this respect, UNICE would like to recall the following:

1. Two fundamental characteristics of CSR are that it is voluntary and business-driven. Recognition of these facts has to remain at the centre of the debate. Advocating a legislative approach towards CSR is in contradiction with the very nature of CSR.
2. There is no “one size fits all” approach to CSR. In order to be successful, CSR policies must be developed from within the organisation and be adapted to its specific circumstances and characteristics. Creating a European CSR framework or model and pressing for standardised approaches are not suitable goals in an overall strategy to promote CSR at EU level.
3. Common principles for responsible business conduct have been established at international level, within the framework of OECD, ILO and the UN. These initiatives are widely recognised in the business community and often considered a source of inspiration when companies draw up their own approaches.
4. Companies must be free to decide the most appropriate method to monitor implementation of their CSR policy, check whether the objectives pursued are achieved and communicate these results internally and externally. Calls for compulsory reporting on voluntary initiatives are unacceptable.

./..

5. The draft report focuses mainly on the responsibilities of companies and does not sufficiently address the role and responsibilities of governments and multilateral organisations, especially when it comes to the promotion of democracy and human rights, the establishment of appropriate legal frameworks for the protection of social and economic rights and the creation of a climate conducive to economic and social progress in non-EU countries. Any debate on CSR has to respect the distribution of roles between companies, governments and multilateral organisations. CSR must not be used as an excuse to shift public responsibilities on to private companies.
6. To conclude, in the light of work already undertaken at international, national and company level, UNICE would not consider it opportune to launch separate initiatives at EU level, adding another layer to ongoing debates. However, an effective contribution to the promotion of CSR at EU level could be achieved through fostering the exchange of experiences and good practices between companies and through promotion of the business case. UNICE is ready to play an active role in this.

We thank you in advance for the consideration you may give to our comments and also take the opportunity to refer you to our UNICE position paper on CSR of November 2001 for a more detailed presentation of our point of view.

Yours sincerely,

Philippe de Buck
Secretary General

Addressees: Members of the European Parliament's Employment and Social Affairs
Committee
Cc: Ms Moro