







Mr Jonathan Faull Director General Internal Market and services European Commission Rue de la Loi 200 1049 BRÜSSEL Belgien

Position paper of the central German business organisations – BDA, BDI, DIHK and ZDH on the CSR communication of the European Commission

Dear Mr Faull

On 25 October 2011 the European Commission adopted the CSR communication "A renewed EU strategy 2011-2014 for Corporate Social Responsibility" in which it proposes a range of measures intended to support companies in efforts to meet their commitment to society.

The theme of CSR in practice has become increasingly important for the central German business organisations – BDA, BDI, DIHK and ZDH – which support companies in this area with information and advice. Exchange of information and practice-oriented awareness-raising have shown themselves to be appropriate measures for promoting CSR. The four organisations therefore endorse the European Commission's proposal for rewarding CSR partnerships between companies and other stakeholders with an EU award and drawing up guidance on human rights questions.

Nevertheless, the focus of the Commission's communication is not on providing proven practical support to companies but on the introduction of new bureaucratic instruments for obligatory reporting and implementation of codes of conduct. Such requirements would not do justice to the diversity of social responsibility exhibited by German companies and would constitute disproportionate interference in their freedom to shape their activities. Overall, the European Commission's new approach contradicts the broad consensus among policy-makers and in society on the voluntary nature of CSR. The leading German business organisations therefore urge the European Commission to continue to respect the principle of voluntary commitment to CSR and to maintain the successful practice-oriented course. Only in this way can it be ensured that companies can combine their business activities with their CSR commitment in a rational manner.

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We attach our comments on the European Commission's communication. We thank you for the consideration you may give to our views and remain at your disposal to discuss this issue.

Yours faithfully

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