



Brussels, 15th August 2014

***EACB answer to 'The European Commission's strategy on
Corporate Social Responsibility (CSR) 2011-2014: achievements,
shortcomings and future challenges'***

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The European Association of Co-operative Banks (EACB) has been the voice of co-operative banks since 1970. It represents, promotes and defends the common interests of its 29 member institutions and of co-operative banks in general. Co-operative banks form decentralized networks which are subject to banking as well as co-operative legislation. With 3,700 locally operating banks and 71,000 outlets, co-operative banks play a major role in the financial and economic system. They serve more than 215 million customers, mainly consumers, SMEs and communities. Europe's cooperative banks represent 56 million members and 850,000 employees and have an average market share of about 20%. Their resilience during the crisis make co-operative banks a key driving force in the economic recovery.

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The European Commission's strategy on Corporate Social Responsibility (CSR) 2011-2014: achievements, shortcomings and future challenges

Fields marked with * are mandatory.

1 Introduction - Background and explanatory remark

1. Purpose of this Public Consultation

The Commission launches this public consultation in order to receive feedback on the implementation of its most recent policy on Corporate Social Responsibility (CSR), which is outlined in the Communication "A renewed EU strategy 2011-14 for Corporate Social Responsibility" (COM(2011) 681).

The results of this public consultation will be summarised in a technical report and further inform the preparation of the plenary meeting of the [multi-stakeholder forum](#) on CSR, which is planned for February 2015. These two events will provide the most essential input for the Commission's work on the direction of its CSR policy after 2014.

2. Key elements of the CSR Communication (COM(2011) 681)

The Commission presented its current [CSR strategy](#) on 25 October 2011. At the center of this strategy stands the objective of helping enterprises achieve their full potential to create wealth, jobs and innovative solutions to the many challenges facing Europe's society. It sets out how enterprises can benefit from CSR as well as contribute to society as a whole by taking greater steps to meet their social responsibility.

The Commission's CSR strategy is built upon pertinent international CSR principles and guidelines, namely the ten principles of the UN Global Compact, ILO Tri-partite Declaration of Principles Concerning Multinational Enterprises and Social Policy, OECD Guidelines for Multinational Enterprises, ISO 26000 Guidance Standard on Social Responsibility and United Nations Guiding Principles on Business and Human Rights.

One of the key elements of the Commission's CSR Communication is a modernised definition of this concept, which should provide greater clarity for enterprises, and contribute to greater global consistency in the expectations on business, regardless of where they operate. The Commission defined CSR as "the responsibility of enterprises for their impacts on society".

Although there is no "one-size-fits-all" approach to CSR, and for most small and medium-sized enterprises the CSR process remains informal, complying with legislation is the basic requirement for an enterprise to meet its social responsibility. Beyond that, enterprises should, in the Commission's view, have a process in place to integrate social, environmental, ethical human rights and consumer concerns into their business operations and core strategy in close cooperation with their stakeholders. The aim is:

- To maximise the creation of shared value, which means to create return on investment for the company's shareholders at the same time as ensuring benefits for the company's other stakeholders;
- To identify, prevent and mitigate possible adverse impacts which enterprises may have on society.

The Commission's approach to CSR follows the assumption that the development of CSR should be led by enterprises themselves. Public authorities should play a supporting role through a smart mix of voluntary policy measures and, where necessary, complementary regulation, for example in the fields of transparency, the creation of market incentives and corporate accountability.

3. The Commission's agenda for action – what has been done

In the CSR Communication, the Commission put forward an action agenda for the period 2011-2014 covering 8 areas. The agenda for action and the Commission's related activities include:

1. Enhancing the visibility of CSR and disseminating good practices:
 - 1.1 In 2013, the European Commission organised the first [European CSR awards](#);
 - 1.2 The Commission launched three projects for the establishment of sector-based multi-stakeholder platforms for enterprises and stakeholders to make commitments and jointly monitor progress (see the projects in the [Fruit Juice](#), [Machine tools](#) and [Social Housing](#) sectors).
2. Improving and tracking levels of trust in business: the Commission published in 2013 a [Eurobarometer survey](#) on citizen trust in business.
3. Improving self- and co-regulation processes: the Commission launched a [Community of Practice](#) platform to work with business and other organizations to develop a code of good practice to guide the development of future self- and co-regulation initiatives.
4. Enhancing market reward for CSR: the Commission revised its public procurement Directives to take better account of [environmental](#) and [social](#) concerns. The Commission also co-sponsored a [project](#) on building the capacity of the European investment community to use and integrate environmental, social and governance (ESG) information.
5. Improving company disclosure of social and environmental information: the Commission revised the [Accounting Directives](#) on the disclosure of non-financial and diversity information by certain large companies and groups.
6. Further integrating CSR into education, training and research: the Commission sponsored for example a research project on [Impact Measurement](#) and Performance Analysis of CSR.
7. Emphasizing the importance of national and sub-national CSR policies: the Commission launched a [CSR peer review process](#) with EU Member States to facilitate the development and/or revision of their own plans for the promotion of CSR.
8. Better aligning European and global approaches to CSR:

8.1. Focusing on internationally recognised CSR principles and guidelines: the Commission published a [first monitoring report](#) of the commitments of large European enterprises to take account of internationally recognized guidelines and principles.

8.2. Implementing the UN Guiding Principles on Business and Human Rights: the Commission published guidance material for [SMEs](#) and [three sectors](#).

8.3. Emphasising CSR in relations with other countries and regions in the world: as an example, CSR features more frequently on the agenda of political dialogues with third countries and trade negotiations (see for example the [EU-South Korean Free Trade Agreement](#), Art. 13.6 (2) and Annex 13 1. (d)).

The full implementation table regarding the Commission's activities can be found [here](#).

This public consultation aims in particular to receive feedback on the various activity streams in order to learn whether they were useful, successful or whether specific actions were missing. It also aims to receive input about what future challenges exist in CSR and what prospective activities might be required.

2 About the Respondent

2.1 Please indicate your full name:*

CSR & Co-operative Affairs Working Group of the European Association of Co-operative Banks

2.2 Please provide your contact details (e-mail, phone no.)

e.bevilacqua@each.coop, m.moreau@each.coop, 02 286 98 46

2.3 Are you replying as:*

- National authority (EU member state)
- Regional authority (EU member state)
- National authority (non-EU member state)
- Industry association
- Individual company (more than 250 employees)
- Individual company (less than 250 employees)
- International organisation
- Civil Society representative
- EU citizen
- Other, please specify

2.4 Your country/ies - if responding on behalf of an organisation/association/authority, please specify all countries represented by your membership*

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other, please specify

2.4 Other*

Text of 1 to 50 characters will be accepted

Canada, Japan, Switzerland

2.5 How would you prefer your contribution to be published on the Commission website?*

- Under the name indicated** (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Anonymously** (I consent to publication of all information in my contribution except my name/the name of my organisation and I declare that none of it is under copyright restrictions that prevent publication)
- Not at all - keep it confidential** (The contribution will not be published, but will be used internally within the Commission)

3 The role of the Commission in CSR

3.1 Please indicate whether you think that the Commission **should engage in a policy on CSR?**

(5 = highest, 1 = lowest indicator)

- 5
- 4
- 3
- 2
- 1

3.2 Please indicate whether you think that the Commission **puts adequate emphasis on CSR?**

(5 = highest, 1 = lowest indicator)

- 5
- 4
- 3
- 2
- 1

3.3 To date, who would you say have been the **most important actors in promoting CSR?**

Please choose maximum three answers

- Private sector (Company, Social enterprise, Business Associations, Investment community)
- Public authorities (European, National, Regional, Local)
- International organisations
- Civil Society Organisations (CSO)
- Consumers (citizens)
- Business customers
- Academia (universities, including business schools, research organisations)
- Others, please specify

4 About the Commission's activities in CSR

4.1 How would you assess the **overall impact** of the Commission's policy on CSR?

- Very useful
- Useful
- Less useful
- Not useful
- Neutral

4.2 What would you say has been the **most important contribution** of the CSR Communication (COM(2011) 681)?

Please choose maximum three answers

- A new definition of CSR
- International leadership and setting of minimum expectations in CSR
- Emphasising the importance of CSR with companies and the society as a whole
- Mainstreaming CSR in a wide range of policies
- Enhancement of visibility (CSR awards, MSF platforms)
- Improving framework conditions (market incentives, e.g. public procurement)
- The proposal for a Directive on the disclosure of non-financial and diversity information by certain large companies and groups
- Publication of guiding material on CSR
- Other, please specify (maximum 100 characters)

4.3 In the 2011 CSR Communication (COM(2011) 681), the Commission outlined an agenda for action which includes eight priority work streams. Regarding the topics of this agenda for action, **please assess the activity streams according to importance:**

	Very important	Important	Less important
1. Enhancing the visibility of CSR and disseminating good practices (see European CSR awards, multi-stakeholder platforms)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Improving and tracking levels of trust in business	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Improving self-and co-regulation processes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
4. Enhancing market reward for CSR:			
A. Consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
B. Public Procurement	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
C. Investment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
5. Improving company disclosure of social and environmental information	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Further integrating CSR into education, training and research	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Emphasising the importance of national and sub-national CSR policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
8. Better aligning European and global approaches to CSR:			
A. Focusing on internationally recognised CSR principles and guidelines	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
B. Implementing the UN Guiding Principles on Business and Human Rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
C. Emphasising CSR in relations with other countries and regions in the world	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

4.4 In the 2011 CSR Communication (COM(2011) 681), the Commission outlined an agenda for action which includes eight priority work streams.

Please indicate if you believe that the Commission was **successful with the implementation of these activities or not.**

	Very successful	Somewhat successful	Not successful	I don't know
1. Enhancing the visibility of CSR and disseminating good practices (see European CSR awards, multi-stakeholder platforms)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Improving and tracking levels of trust in business	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. Improving self-and co-regulation processes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Enhancing market reward for CSR:	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A. Consumption				
B. Public Procurement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
C. Investment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
5. Improving company disclosure of social and environmental information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Further integrating CSR into education, training and research	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
7. Emphasising the importance of national and sub-national CSR policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Better aligning European and global approaches to CSR:				
A. Focusing on internationally recognised CSR principles and guidelines	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Implementing the UN Guiding Principles on Business and Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Emphasising CSR in relations with other countries and regions in the world	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

4.4 Please specify why (2)*

Text of 1 to 100 characters will be accepted

N.A

4.4 Please specify why (4 C)*

Text of 1 to 100 characters will be accepted

There are contradictions between some of the banks regulation (i.e: Basel 3) & the CSR objectives.

4.4 Please specify why (6)*

Text of 1 to 100 characters will be accepted

N.A

4.5 Were there any shortcomings or activities missing in the agenda for action of the 2011 CSR Communication (COM(2011) 681)?

- Yes (please specify)
- No
- I don't know

4.5 Please specify*

Text of 1 to 200 characters will be accepted

Among other things, the possibility/ opportunity for incentive schemes that would foster RSI in the EU.

4.6 Outside the agenda for action, do you think CSR gave an **important impetus for other policy initiatives**? If so, which ones?

- Country-by-country reporting/ disclosure requirements for the extractive industry and loggers of primary forests: Revision of the Accounting Directives ([78/660/EEC](#) and [83/349/EEC](#)) and the Transparency Directive ([2004/109/EC](#))
- Proposal for a [Regulation setting up a Union system for supply chain due diligence self-certification of responsible importers of tin, tantalum and tungsten, their ores, and gold originating in conflict affected and high-risk areas](#) and Joint Communication on [Responsible sourcing of minerals originating in conflict-affected and high-risk areas: Towards an integrated EU approach](#)
- Other, please specify

4.6 Other*

Text of 1 to 500 characters will be accepted

I do not know

4.7 Do you think that there were **other initiatives with an impact on CSR?**

- Yes (please specify)
- No
- I don't know

4.7 Please specify*

Text of 1 to 300 characters will be accepted

The development of the Global Reporting Initiative (GRI) Framework -in particular the G4 guidelines- as well as specific regulation at national level (i.e: in France Grenelle2, ISO 26000...)

5 Future issues on CSR

5.1 What would you say should be the **role of the Commission** in CSR?

- International standard setting / leadership in CSR
- Raising the awareness and visibility of CSR
- Bringing stakeholders together around key CSR issues
- Supporting companies in implementing CSR
- The Commission should not be active in CSR at all
- Other, please specify

5.2 For the future EU policy on CSR, what would you suggest should be the **main objectives**?

Please rank your top-5 priorities (1 = highest, 5 = lowest)

	1	2	3	4	5
To achieve an international global level playing field, through e.g. third country cooperation, engagement in international fora etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To raise the visibility and importance of CSR amongst all societal actors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To implement the UN Guiding Principles on business and human rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To support companies in adhering to CSR principles, e.g. through guiding material	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To promote transparency measures on CSR (e.g. reporting, sustainable responsible investment etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To enhance market reward for CSR (e.g. through public procurement, investment or consumer policies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To work on better education on CSR (business schools, universities, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
To strengthen the cooperation with EU member states and regions on CSR	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.3 What would you say are the **main challenges for an EU policy on CSR** in the future?

Text of 1 to 300 characters will be accepted

The substantial increase of awareness among EU citizens of CSR as 'key for the future' The promotion of the Social Eco at EU level Enhancing the CSR knowledge of the enterprises(meaning) CSR should be a global topic & measurements should be undertaken worldwide to improve social & envi standards

5.4 Please indicate whether you would say that CSR has an **important impact on the medium/long-term competitiveness of the EU economy?**

(5 = highest, 1 = lowest indicator)

- 5
 4
 3
 2
 1

5.5 Please indicate whether you would say that CSR has an **important impact on the sustainability of the EU economy as a whole?**

(5 = highest, 1 = lowest indicator)

- 5
 4
 3
 2
 1

5.6 Why would you say that CSR is **important for companies?**

Text of 1 to 400 characters will be accepted

All enterprises, as producers of goods and as employers, are assumed by consumers to be fundamentally responsible towards the society and the environment. From this perspective, CSR is a global approach that should: -help them to raise awareness on the ins and outs of sustainable development, -facilitate a fair competition, -put forward a long term approach for a sustainable economy.

5.7 Why would you say that CSR is **important for society?**

Text of 1 to 400 characters will be accepted

CSR should be the pillar of the collective identity of all economically active actors. On the long-term, CSR should contribute to a balanced development and growth of the economy and of the society at large.