



Wednesday 3 March 2021

Directorate-General for Financial Stability, Financial Services and Capital Markets Union
European Commission
1049 Bruxelles/Brussel
Belgium

To Whom It May Concern,

I am reaching out in my capacity of Chief External Affairs Officer of the Global Reporting Initiative (GRI) to express my support for your initiative on the establishment of a European single access point (ESAP) for financial and non-financial information publicly disclosed by companies. GRI welcomes the opportunity to provide input into this timely initiative by the European Commission. We are convinced that it will help the European Union progress in the achievement of its sustainable finance ambitions, as set out in the Green Deal, as well as the attainment of an environmentally and socially sustainable economy.

This letter accompanies our submission to the questionnaire and offers a couple of salient additional points for consideration.

Support for a mandatory database

In [our response](#) to the consultation on the revision of the non-financial reporting directive (NFRD), we indicated that the success of this initiative is highly dependent on collection, aggregation and analysis of non-financial disclosures. We urged the Commission to consider mandating the development of a publicly accessible and searchable database for non-financial disclosures, from which interested parties can draw information to inform their decision making or commercial products. In addition, policy makers could use this data platform to determine performance trends to inform further regulation. Not surprising therefore that GRI is supporting the ESAP initiative.

Preparer benefits

GRI is an independent international standard-setting organization that helps businesses and governments worldwide understand and communicate their impact on critical sustainability issues such as climate change, human rights, governance and social well-being. We hear from preparers using the GRI Standards, and sometimes other reporting instruments as well, that an independent database that would facilitate their responses to various questionnaires, e.g., from rating agencies, using the data issued from GRI reporting, would be very welcome.



Free availability of data

GRI believes that both financial and non-financial disclosures are more valuable if stakeholders can easily access, analyze and compare the information based on their needs. Likewise, we support the idea that all reported information should be made publicly available and accessible free of charge for non-commercial users. Digital reporting technologies can play a vital role in this analysis, thereby reducing any undue reporting burden. While the market for environmental, social and governance (ESG) data and analysis already has several for-profit actors, the ESAP would greatly benefit from end-to-end digitalization based on internationally standardized protocols. This freely available data could be used by policy makers, civil society and all other stakeholders to assess progress towards achieving publicly set objectives as well as global targets like the Sustainable Development Goals (SDGs) and Paris Agreement objectives. In this context, in alignment with the reported data, the non-financial reporting standards following the revision of the NFRD should become a free public good just like the GRI Standards.

Data tagging

Further, we believe that efficient data collection requires data tagging techniques and would require financial and technical support beyond that needed for standards development, as detailed through the more technical questions in the consultation. Data tagging would further reduce the reporting burden of companies and help drive the global acceptance of an integrated European reporting approach.

Consultation questions

As explained above, we refrained from answering questions on the most technical aspects of the ESAP. Regarding all the EU legislations mentioned (question 7), we opted to only answer the questions on the legislations directly related to sustainability reporting. This does not mean that we are opposed to the consideration of other kinds of reporting and data collection.

The European Commission can set a global example by combining this proposed data instrument with the use of publicly available reporting standards with a global reach, both under public oversight.

We take this opportunity to once again wish you success on this initiative in connection with the NFRD process and others initiatives under the new action plan on sustainable finance. Needless to say that GRI remains available to provide any input or expertise you may need.

Sincerely,

Peter Paul van de Wijs



Chief External Affairs Officer

