



Antonis Kastrissianakis, Director,  
Directorate-General for Employment and Social Affairs  
Pedro Ortún, Director,  
Directorate-General for Enterprise and Industry  
The European Commission  
1049 Brussels

29th November 2006.

Dear Sirs,

Thank you for inviting environmental NGOs in the form of the Green 10 to participate in the CSR Multi-stakeholder Forum on 7 December and to take part in preparatory meetings – your e-mail of 15 November refers.

Since 2000 and the first discussions on CSR in an EU institutional context, NGOs (including the G-10) have argued consistently that the credibility of CSR initiatives is highly dependent on a number of basic criteria. These include inter alia the level of standards and commitments, the involvement of stakeholders, transparency requirements and the quality of the monitoring and independent verification. We believe that the Commission's 2002-2004 Multi-stakeholder Forum did not allow for these themes to be discussed properly. Therefore NGO views were not reflected adequately in the final report of the Forum.

Despite this, when the Commission announced in the autumn a follow-up meeting to the Multi-stakeholder Forum, several NGOs decided to take part in the preparation committee in the hope that it would be possible this time for NGOs' concerns to be more adequately addressed. But it soon became clear that the Commission would neither generate nor support any new proposals going beyond the voluntary initiatives announced in the March 2006 CSR Communication. Representatives of UNICE and Eurochambres indicated that they were unwilling to consider any new commitments; for them the Multi-stakeholder Forum would be a limited review amounting to no more than a stock-taking exercise. This would limit the meeting to an evaluation of existing voluntary initiatives only.

Regrettably, we have concluded that we have no confidence that our participation in another Forum would result in any meaningful progress. Therefore, at its meeting on November 20, the G-10 has decided not to take part in the Multi-stakeholder Forum meeting on December 7.

We wish to reiterate our commitment to advancing CSR in such a way that enterprises can be held accountable for their activities. In our view, expressed throughout the first Forum meetings, a voluntary approach will not guarantee accountability in the way we have defined it above. We believe the Commission should acknowledge that the voluntary approach is not sufficient on its own to secure these wider objectives.

Once again we thank you for the invitation. We trust that there will be other occasions to exchange views on this subject which are not so heavily constrained, we believe, towards preordained outcomes.

Yours sincerely,

Tony Long Director WWF EPO on behalf of G10 Directors.

C. Papazoglou, BirdLife International	J. Dings, European Federation for Transport & Environment, T&E
M. Stockzkiewicz, CEE Bankwatch	M. Duwe, Climate Action Network CAN Europe
G. K. Jensen, European Public Health Alliance – Environment Network EEN	J. Hontelez, European Environmental Bureau
C. Baumgartner, Friends of Nature International	J. Riss, Greenpeace
F. Hamdan, Friends of the Earth Europe	