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Mr Takuya Fukumoto  
Secretary General  
Ms Yukako Kinoshita  
CSR Committee Chair  
Japan Business Council in Europe  
Rue de la Loi 82  
1040 Brussels

Dear Mr Fukumoto,  
Dear Ms Kinoshita,

Thank you for your letter dated 28 November 2011 on disclosure of non-financial information by companies that you addressed to several members of the services of the European Commission in the Internal Market and Services; Employment, Social Affairs and Inclusion; Environment; Enterprise and Industry Directorates General. This response letter has been coordinated among the services.

As you know, the European Commission adopted in October the communication on Corporate Social Responsibility which announces, among others, a legislative measure on the disclosure of social and environmental information by companies. This reiterates the announcement made in April in the Single Market Act communication, and follows a broad public consultation that concluded in January 2011.

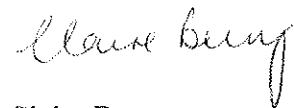
We thank the Japan Business Council in Europe for its interest, and its active participation in the mentioned public consultation and in other stakeholders' events. We take note of your arguments in favour of EU harmonisation of disclosure requirements, the link to the international level, a principles-based approach, disclosure at group level, and the importance of materiality considerations.

As the Commission intends to present a legislative proposal in 2012, we will avoid any undue administrative burden on companies, and in particular on small and medium-sized enterprises.

We would like to draw your attention to the fact that in mid-December a public consultation will be open by DG Environment on the environmental foot-printing of organisations, aiming at promoting the measurement, display and benchmarking of environmental performance based on a life-cycle approach. We hope to receive your views on this initiative as well.

Thank you again for bringing your perspective to our attention.

Yours sincerely,

A handwritten signature in cursive script that reads "Claire Bury".

Claire Bury  
Director  
DG Internal Market and Services

Cc:  
Jean-Louis De Brouwer  
Director - DG Employment and Social Affairs

Pedro Ortun Silvan  
Director - DG Enterprise

Soledad Blanco  
Director - DG Environment