

## JBCE PROPOSAL FOR BETTER IMPLEMENTATION OF THE CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE

Japan Business Council in Europe (JBCE), representing companies of Japanese parentage operating in Europe, would like to express our alignment with and support for the principles of the Corporate Sustainability Due Diligence Directive (CSDDD) and provide recommendations to further enhance its implementation. As representatives of EU-based companies with headquarters in third countries, we strongly believe that our perspectives could significantly contribute to the successful transposition and implementation of this Directive.

### Input from a dual perspective: EU Companies with a Third-Country Parentage

Given its extraterritorial impact, especially concerning the implementation of due diligence obligations and legal measures for chains of activities in third countries, it is crucial to develop practical, effective, and comprehensive accompanying measures such as delegated acts, guidelines, model contractual clauses, industry schemes, help desks, etc. As operating EU-based companies with headquarters located outside of the EU, we believe it is beneficial to offer our practical insights and experiences to support such implementation of the CSDDD. We look forward to collaborating with the European Commission to share our best practices and contribute to a robust and effective framework.

### Establishing a Stakeholder Forum for the CSDDD

To achieve effective implementation as outlined above, we wish to highlight the success of stakeholder forums in other environmental policy areas, such as the Ecodesign and Energy Labelling Consultation Forum (EELCF). These forums have proven to be effective in fostering comprehensive and systematic policy development. In light of the above, we strongly recommend that a similar stakeholder forum be created for the CSDDD, encompassing industry stakeholders from European and non-EU enterprises. Such a forum would allow us to share our experiences as companies operating outside and within the EU.

Incorporating input from a diverse range of stakeholders, will enable the European Commission to develop more effective and well-rounded policies. This collaborative approach will enhance the implementation of the Directive and foster a more sustainable and responsible global business environment.

We would be deeply honoured to have the opportunity to contribute further to this important initiative. We remain at the European Commission's disposal for any discussion or inquiries.

## ABOUT JBCE

Founded in 1999, Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of over 100 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles, and glass products.

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