

[Call for Open Data Principles in EU Corporate Sustainability Reporting Directive Legislation](#)

Dear EU Commission and Members of the European Parliament:

We, the undersigned, strongly call for the *adoption and incorporation of open data principles* in the proposed [Corporate Sustainability Reporting Directive](#) and the supporting reporting frameworks.

Open Data is “data that can be freely used, re-used and redistributed by anyone - subject only, at most, to the requirement to attribute and sharealike” ([Open Data Handbook](#)). To ensure data is open, it must meet the standards of [legal openness and technical openness](#) or the “F.A.I.R” principle:

- **F: Findable** or easily discoverable on a website or within a database
- **A: Accessible** or available in a [machine readable](#), “convenient, modifiable form” and published as a whole, [complete dataset](#) (not cherry-picked)
- **I: Interoperable** or able to be mixed with different data sets
- **R: Reusable** or provided under an [\(open\) license](#) that permits re-use and redistribution, including the intermixing with other datasets.

Data shared as a linked PDF, buried in a lengthy corporate sustainability report, would not meet the standard of Open Data.

The reporting frameworks and requirements of the [Corporate Sustainability Reporting Directive](#) must integrate Open Data principles to unlock the legislation’s full potential. First, Open Data principles are already [European Union policy](#) and recommended in the [OECD Due Diligence for Responsible Supply Chains in the Garment and Footwear Sector](#). Second, these principles will ensure that one, the data produced as a result of the legislation is accessible to all stakeholders, rather than select groups, and two, that data collation can be automated, meaning accountability can be scaled to encompass all reporting entities across multiple sectors. Due Diligence data shared in both a legal and technical open manner will eliminate duplication of efforts, ensuring efficiencies across public and private initiatives and collaboration across stakeholder groups.

For example, an open dataset of a company’s suppliers would allow stakeholders such as unions, manufacturers, companies and government to collaborate on remediation efforts within a supply chain, allow consumers to understand their product’s impact and provenance and allow academics to share research with relevant stakeholders on the supply chain’s environmental footprint.

Clearly defining the disclosure format and data points required in the [Corporate Sustainability Reporting Directive](#) will also increase adoption of the reporting framework and ensure its scalability. As [research in Germany](#) showed, unclear or free-form standards for CSR reporting led to only 17-19% of companies completing their required reporting. Complete, open data sets

must also be mandatory to realize their full potential to bring about real, long term lasting impact. Future innovations or academic research yet unknown will benefit enormously from whole data sets, rather than summary analysis or cherry picked stats. By having clearly defined, repeatable and predictable reporting forms and methods, and mandating this reporting meets open data standards, costs can be reduced and harmonization across member states will increase, something that benefits all stakeholders.

In closing, we strongly urge EU members of Parliament and the EU Commission to adopt and incorporate open data principles into the proposed [Corporate Sustainability Reporting Directive](#) to ensure stakeholder access, interoperability and collaboration.

By:



Clean Clothes Campaign
 Open Apparel Registry
 WikiRate
 Azavea
 Business and Human Rights Resource Centre
 Fashion Revolution

OpenCorporates
Open Data Institute
Open Knowledge Foundation
International Corporate Accountability Roundtable (ICAR)
Icebreaker One
Somo
The Center for the Advancement of Garment Making
C-MORE
Je valide ça, service-conseil
TISC Report
Sourcing Playground
The Restart Project
Viet Labor Movement
Myanmar Centre for Responsible Business
J & M Fanwear
Cornell University New Conversations Project
Inno Community Development Organisation
Young IL Co.,Ltd
Changing Markets Foundation
Custom Collaborative
Open Carbon
Lady Lawyer Foundation and Lady Lawyer Fashion Archive
Comitato Lady Lawyer Village
Etrify

Sign: To add your organization's name to the letter, please sign here: https://bit.ly/open_data_csr_form

Press: please contact info@openapparel.org