

Call for feedback on the Platform on Sustainable Finance's draft report on social taxonomy

Fields marked with * are mandatory.

Introduction

Disclaimer:

This call for feedback is part of ongoing work by the [Platform on Sustainable Finance](#), which was set up by the Commission to provide advice on the further development of the EU taxonomy framework.

This feedback process is not an official Commission consultation. The draft report produced by the Platform is not an official Commission document. Nothing in this feedback process commits the Commission nor does it preclude any policy outcomes.

In March 2018 the Commission published its [action plan: financing sustainable growth](#), based on the advice of the [High Level Expert Group \(HLEG\)](#). Action 1 of the Commission's action plan calls for the establishment of an EU classification system for sustainable activities, or taxonomy. The Commission followed through on this action by proposing a regulation for such a taxonomy. The [Taxonomy Regulation](#) was adopted by the co-legislators in June 2020. It establishes the basis for the [EU taxonomy](#) by setting out 4 overarching conditions that an economic activity has to meet in order to qualify as making a substantial contribution to environmental objectives.

Development of the EU taxonomy relies on extensive input from experts from across the economy and civil society. The [Platform on Sustainable Finance](#) plays a key role in enabling such cooperation by bringing together the best expertise on sustainability from the corporate and public sector, from industry as well as academia, civil society and the financial industry join forces.

While the work started with classifying environmentally sustainable activities, the need to better understand socially sustainable investments was acknowledged from the onset, and featured among the recommendations of the HLEG in

2 0 1 8 .

In October 2020, the Commission established the Platform for Sustainable Finance, and created with five working groups, including the [Subgroup on social taxonomy](#), which was tasked to:

1. explore the extension of the taxonomy regulation to social topics
2. elaborate potential objectives of a social taxonomy
3. work out a structure of a social taxonomy
4. identify approaches to substantial contribution and 'do no significant harm' in the field of 'social'
5. reflect on governance, business ethics, anti-bribery and tax compliance
6. consider potentially harmful activities
7. suggest a relationship between a green and a social taxonomy

On 12 July 2021, the Platform published its [first draft report on a proposal for a social taxonomy](#).

The report assesses the merits of a social taxonomy in addition to the environmental taxonomy, and explores possible avenues to complement the existing taxonomy. The report also proposes various objectives and sub-objectives for a social taxonomy, as well as possible approaches for defining "substantial contribution" and "do no significant harm" criteria. Finally, it develops two alternative models for articulating the social taxonomy with the environmental taxonomy.

Call for feedback

The Platform is inviting stakeholders to provide feedback on the draft report through this online questionnaire.

The deadline for providing feedback has been extended to Monday 6 September 2021 at 12:00 CEST (midday).

In the online questionnaire, you will be asked to comment on certain aspects of the report and make suggestions.

Next steps

The Platform is still working on some important aspects of these questions and will proceed to develop its final report and final recommendations after considering the stakeholder input collected through this call for feedback.

The Platform will submit the final report with their advice to the Commission in autumn 2021. The Commission will analyse and consider the report in view of the continuous developing of the EU taxonomy, as anticipated in the new [sustainable finance strategy](#).

By the end of 2021, the Commission will publish a report on the provisions required for a social taxonomy, as required by the Taxonomy Regulation.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-platform-sf@ec.europa.eu.

More information on

- [the call for feedback document](#)
- [the draft report on a social taxonomy](#)

- [the publication of the 2 draft reports](#)
- [the Platform on Sustainable Finance](#)
- [sustainable finance](#)
- [the protection of personal data regime for this call for feedback](#)

About you

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Filippo

* Surname

Montesi

* Email (this won't be published)

f.montesi@socialimpactagenda.it

* Organisation name

255 character(s) maximum

Social Impact Agenda per l'Italia

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Where are you based and/or where do you carry out your activity?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia

- Spain
- Sweden
- Switzerland
- United Kingdom
- Other country

Field of activity

*** Financial activity**

Please select as many answers as you like

- Accounting
- Auditing
- Banking
- Credit rating agencies
- Insurance
- Pension provision
- Investment management (e.g. hedge funds, private equity funds, venture capital funds, money market funds, securities)
- Market infrastructure operation (e.g. CCPs, CSDs, Stock exchanges)
- Social entrepreneurship
- Other
- Not applicable

*** Please specify your financial activity field(s)**

Impact investing

*** Non-financial activity (NACE)**

Please select as many answers as you like

- Agriculture, forestry and fishing
- Mining and quarrying
- Manufacturing
- Electricity, gas, steam and air conditioning supply
- Water supply; sewerage, waste management and remediation activities
- Construction
- Transportation and storage
- Accommodation and food service activities

- Information and communication
- Real estate activities
- Professional, scientific and technical activities
- Administrative and support service activities
- Public administration and defence; compulsory social security
- Education
- Human health and social work activities
- Other
- Not applicable

* Please specify your non-financial activity (NACE) field(s)

94.99 Activities of other membership organisations n.e.c

* **Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Yes, I agree to my responses being published under the name I indicate (name of your organisation/company/public authority or your name if your reply as an individual – your email address will never be published)**
- No, I do not want my response to be published**

I agree with the [personal data protection provisions](#)

Your opinion

Merits and concerns

The draft report describes the merits of a social taxonomy and potential concerns.

Question 1.1 Which in your view are the main merits of a social taxonomy?

Please select as many answers as you like

- supporting investment in social sustainability and a just transition
- responding to investors' demand for socially orientated investments
- addressing social and human rights risks and opportunities for investors
- strengthening the definition and measurement of social investment

other

none

Please specify to what other merit(s) you refer in your answer to question 1.1:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

SIA appreciate the development of a Social Taxonomy, as it gives attention to social impacts, which have so far been less interested by disclosure and reporting requirements. This appears even more important considering the dramatic consequences of the COVID pandemic.

A social taxonomy could also help enterprises to innovate their business models, by providing examples of good practices in sustainability and orienting the capital allocation towards better social value propositions. A common framework at the EU level would reduce the disorientation that some companies are having in face of the many norms and standards that define sustainability across EU member states.

We also appreciate the value chain approach proposed on Sustainable Finance, which is mainly developed through the horizontal dimension.

Finally, the social taxonomy by setting a coherent and consistent framework for assessing the social sustainability of business activities will contribute to reducing social washing.

Question 1.2 Which in your view are the main concerns about a social taxonomy?

Please select as many answers as you like

interference with national regulations and social partners' autonomy

increasing administrative burden for companies

other

none

Please specify to what other concern(s) you refer in your answer to question 1.2:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

We are concerned that the social taxonomy could not adequately include SMEs, which represent the bulk of undertakings and have critical role to mainstream sustainable business models in Italy. The social taxonomy should be conceived as a key means to allocate capital not only to large corporations but also to SMEs.

To include SMEs and make them benefit from the social taxonomy opportunities we suggest engaging with them and providing practical guidelines and support.

The social taxonomy should set rigorous thresholds for defining sustainability and protecting impact integrity while not hampering the transition from conventional to sustainable business models.

To orient capital allocation towards real impactful activities, impact metrics should be defined through a deep stakeholder engagement, which would involve not only financial investors, intermediaries and companies but also the civil society. This would provide the social taxonomy greater political and social legitimacy.

Structure of the social taxonomy

The draft report suggests a structure for a social taxonomy distinguishing between a vertical and a horizontal dimension. The vertical dimension would focus on directing investments to activities that make products and services for basic human needs and for basic economic infrastructure more accessible, while the horizontal dimension would focus on human rights processes.

The objective linked to the vertical dimension of the social taxonomy would be to promote adequate living standards. This includes improving the accessibility of products and services for basic human needs such as water, food, housing, healthcare, education (including vocational training) as well as basic economic infrastructure including transport, Internet, clean electricity, financial inclusion.

The objective linked to the horizontal dimension would be to promote positive impacts and avoid and address negative impacts on affected stakeholder groups, namely by ensuring decent work, promoting consumer interests and enabling the creation of inclusive and sustainable communities.

Question 2. In your view, are there other objectives that should be considered in vertical or horizontal dimension?

- Yes
- No
- Don't know / no opinion / not applicable

Please explain your answer to question 2:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

In general, Social Impact Agenda per l'Italia consider the taxonomy articulation in horizontal and vertical dimensions well-conceived and comprehensive of the many and diverse business activities. We would, however, encourage to further develop the horizontal objectives challenging companies that claim sustainability not only to promote adequate living standards but also to improve the wellbeing of vulnerable people and communities. This would provide more space to impact investments to channel financial resources to solutions that go beyond meeting basic needs and provide additional positive impact. We are aware that for certain enterprises operating through long and complex supply chains this can be challenging, but sustainability goes beyond minimum compliance.

Question 3. Which of the following activities should in your view be covered in the vertical dimension (social products and services)?

Please select as many answers as you like

- A1 - Crop and animal production,
- A1.1 - Growing of non-perennial crops
- A1.2 - Growing of perennial crops
- A1.4 - Animal production
- A3 - Fishing and aquaculture
- C10 - Manufacture of food products
- C10.8.2 - Manufacture of cocoa, chocolate and sugar confectionery
- C10.8.3 - Processing of tea and coffee

- ☐ C10.8.6 - Manufacture of homogenised food preparations and dietetic food
- ☐ C13 - Manufacture of textiles
- ☐ C20.1.5 - Manufacture of fertilisers and nitrogen compounds
- ☐ C20.2 - Manufacture of pesticides and other agrochemical products
- ☐ C21 - Manufacture of basic pharmaceutical products and pharmaceutical preparations
- ☐ C23.3 - Manufacture of clay building materials
- ☐ C23.5 - Manufacture of cement, lime and plaster
- ☐ C25.2.1 - Manufacture of central heating radiators and boilers
- ☐ C30.1 - Building of ships and boats
- ☐ C30.2 - Manufacture of railway locomotives and rolling stock
- ☐ C30.3 - Manufacture of air and spacecraft and related machinery
- ☐ C30.9.2 - Manufacture of bicycles and invalid carriages
- ☐ C31 - Manufacture of furniture
- ☐ C32.2 - Manufacture of musical instruments
- ☐ C32.3 - Manufacture of sports goods
- ☐ C32.5 - Manufacture of medical and dental instruments and supplies
- ☐ D35.1 - Electric power generation, transmission and distribution
- ☐ D35.3 - Steam and air conditioning supply
- ☐ E - Water supply; sewerage; waste management and remediation activities
- ☐ E36 - Water collection, treatment and supply
- ☐ E37 - Sewerage
- ☐ E38 - Waste collection, treatment and disposal activities; materials recovery
- ☐ E38.3 - Materials recovery
- ☐ E39 - Remediation activities and other waste management services
- ☐ F41 - Construction of buildings
- ☐ F42.1 - Construction of roads and railways
- ☐ F42.1.2 - Construction of railways and underground railways
- ☐ F42.2.2 - Construction of utility projects for electricity and telecommunications
- ☐ F43.3 - Building completion and finishing
- ☐ G45.2 - Maintenance and repair of motor vehicles
- ☐ G46.1.6 - Agents involved in the sale of textiles, clothing, fur, footwear and leather goods
- ☐ G46.1.7 - Agents involved in the sale of food, beverages
- ☐ G47.5.1 - Retail sale of textiles in specialised stores

- H49.1 - Passenger rail transport, interurban
- H49.2 - Freight rail transport
- H49.3 - Other passenger land transport
- H49.3.1 - Urban and suburban passenger land transport
- H50.1 - Sea and coastal passenger water transport
- H50.3 - Inland passenger water transport
- H51.1 - Passenger air transport
- J58.1 - Publishing of books, periodicals and other publishing activities
- J59.1 - Motion picture, video and television programme activities
- J60 - Programming and broadcasting activities
- K - Financial and insurance activities
- L68.2 - Renting and operating of own or leased real estate
- M71 - Architectural and engineering activities; technical testing and analysis
- M72.1.1 - Research and experimental development on biotechnology
- N77.1.1 - Renting and leasing of cars and light motor vehicles
- N77.2 - Renting and leasing of personal and household goods
- N78.1 - Activities of employment placement agencies
- N78.2 - Temporary employment agency activities
- N78.3 - Other human resources provision
- O84.1.2 - Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security
- O84.2 - Provision of services to the community as a whole
- O84.2.4 - Public order and safety activities
- O84.2.5 - Fire service activities
- O84.3 - Compulsory social security activities
- P85.1 - Pre-primary education
- P85.2 - Primary education
- P85.2.0 - Primary education
- P85.3 - Secondary education
- P85.3.2 - Technical and vocational secondary education
- P85.4.2 - Tertiary education
- Q - Human health and social work activities
- Q86.1 - Hospital activities
- Q86.2 - Medical and dental practice activities
- Q87 - Residential care activities

- Q88 - Social work activities without accommodation
- Q88.9.1 - Child day-care activities
- Q88.9.9 - Other social work activities without accommodation n.e.c.
- R - Arts, entertainment and recreation
- R93.1.3 - Fitness facilities
- S95 - Repair of computers and personal and household goods
- S96.0.4 - Physical well-being activities
- Other

Question 4. Do you agree with the approach that the objectives in the horizontal dimension, which focusses on processes in companies such as the due diligence process for respecting human rights, would likely necessitate inclusion of criteria targeting economic entities in addition to criteria targeting economic activities?

- Yes
- No
- Don't know / no opinion / not applicable

Please explain your answer to question 4:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes. There should be a coherence between the sustainability of the economic entity and the one of the economic activity.

Harmful activities

The report envisages harmful activities as those which are fundamentally and under all circumstances opposed to the objectives suggested in this proposal for a social taxonomy. There would be two sources on which this rationale can be build: internationally agreed conventions, e.g. on certain kinds of weapons & detrimental effects of certain activities, for example on health.

Question 5. Based on these assumptions, would you consider certain of the following activities as 'socially harmful'?

Please select as many answers as you like

- A1.1.5 - Growing of tobacco
- B5 - Mining of coal and lignite

- B7 - Mining of metal or iron ores
- B9 - Mining support service activities
- B9.1 - Support activities for petroleum and natural gas extraction
- C10.8.1 - Manufacture of sugar
- C10.8.2 - Manufacture of cocoa, chocolate and sugar confectionery
- C10.8.3 - Processing of tea and coffee
- C11.0.1 - Distilling, rectifying and blending of spirits
- C11.0.2 - Manufacture of wine from grape
- C11.0.5 - Manufacture of beer
- C11.0.7 - Manufacture of soft drinks;
- C12 - Manufacture of tobacco products
- C13 - Manufacture of textiles
- C15.2 - Manufacture of footwear
- C20.2 - Manufacture of pesticides and other agrochemical products
- C25.4 - Manufacture of weapons and ammunition
- C25.4.0 - Manufacture of weapons and ammunition
- C30.4 - Manufacture of military fighting vehicles
- G46.1.6 - Agents involved in the sale of textiles, clothing, fur, footwear and leather goods
- G46.3.5 - Wholesale of tobacco products
- G46.3.6 - Wholesale of sugar and chocolate and sugar confectionery
- G46.4.2 - Wholesale of clothing and footwear
- G47.1.1 - Retail sale tobacco predominating
- N80.1 - Private security activities
- O84.2.2 - Defence activities
- Other

Please specify to what other activity(ies) you refer in your answer to question 5:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

As for 'socially harmful' activities, we are not indicating specific activities. However, we agree that internationally agreed conventions along with research evidence on detrimental effects should guide their definition.

Governance objectives

Question 6. Sustainability linked remuneration is already widely applied in sustainable investment. In your view, would executive remuneration linked to environmental and social factors in line with companies' own targets, therefore also be a suitable criterion in a social classification tool such as the social taxonomy?

- Yes
- No
- Don't know / no opinion / not applicable

Please explain your answer to question 6:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Linking executive remuneration to robust, specific, and measurable social and environmental impact targets can contribute to creating incentives to pursue positive sustainability outcomes. Also in this case, some degree of standardisation would be useful to allow comparability between companies and to avoid social washing. To be meaningful, environmental and social targets should be integrated into the company's strategy and decision-making processes. Finally, we would recommend independent third-party verification to assure that the company is indeed contributing to the environmental and social factors.

Question 7. The report envisages governance objectives and analyses a certain number of governance topics. Please select the governance topics which in your view should be covered:

Please select as many answers as you like

- Sustainability competencies in the highest governance body
- Diversity of the highest governance body (gender, skillset, experience, background), including employee participation.
- Transparent and non-aggressive tax planning
- Diversity in senior management (gender, skillset, experience, background)
- Executive remuneration linked to environmental and social factors in line with companies' own targets
- Anti-bribery and anti-corruption
- Responsible auditing
- Responsible lobbying and political engagement
- Other

Models for linking an environmental and a social taxonomy

The report suggests two models for linking an environmental and a social taxonomy

- **Model 1:** The social and an environmental taxonomy would only be related through social and environmental minimum safeguards with governance safeguards being valid for both. The [UN guiding principles](#) would serve as minimum safeguards for the environmental part, while the environmental part of the [OECD guidelines](#) would serve as environmental minimum safeguards for the social part. The downside would be thin social and environmental criteria in the respective other part of the taxonomy
- **Model 2:** There would be one taxonomy with a list of social and environmental objectives and DNSH criteria. It would essentially be one system with the same detailed 'do no significant harm' criteria for the social and environmental objectives. The downside would be that there would be fewer activities that would meet both social and environmental 'do no significant harm' criteria

Question 8. Which model for extending the taxonomy to social objectives do you prefer?

- Model 1
- Model 2
- Don't know / no opinion / not applicable

Please explain your answer to question 8:

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Mod.2 provides a complete approach to sustainability, minimising cherry picking of easier social or environmental outcomes. The social and environmental dimensions go hand in hand and should be treated in a single coherent framework. Through Mod.2 companies would also be in a better condition to identify and manage unintended negative outcomes. Sustainability claims require business behaviours that go beyond the UNGP and the OECD guidelines compliance.

Besides the stated downside of Mod.2, SIA has identified further tradeoffs: the risk that in a unified taxonomy, the social component could become underdeveloped compared to the environmental one, as well documented with ESG frameworks; the rigor of Mod.2 could lead companies to opt out if it is perceived as an over standard that they will not meet. Given the benefits of Mod.2 and the ability to mitigate these risks through identification and proper planning, SIA looks forward to contributing to ongoing development of Mod. 2.

General expectation from the social taxonomy

Question 9. What do you expect from a social taxonomy?

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

As mentioned in above questions, Social Impact Agenda per l'Italia expect that the social taxonomy will stand on equal footing with the green taxonomy into a common and synergic framework that is inclusive, transparent and relevant for all business entities. The social taxonomy should facilitate the adoption of sustainable practices rather than becoming a burden or a barrier for economic entities. By harmonizing measurement methods and allowing greater comparability, we envisage that it will encourage sustainability innovation and fair competition within the EU.

We expect that indicators and criteria of the taxonomy will help investors and businesses to account the positive and negative, intended and unintended, changes experienced by stakeholders due to their activities. This would support both sustainable investment and public policy objectives.

As a community of impact leaders, Social Impact Agenda per l'Italia also expect that, though the social dimension be more complex and context-specific, metrics and thresholds will be defined according to research evidence. In particular, metrics and thresholds related to the 'do no significant harm' and 'substantial contribution' criteria should be clearly defined, based on both research evidence and stakeholder accountability, and accompanied by examples and case studies. This is crucial for protecting the impact integrity of investments and ensuring fair competition among economic players.

Given the many initiatives at the international level on impact measurement and reporting, the Platform should dedicate particular attention to the harmonisation and alignment with international standards and guidelines to encourage convergence and comparability in a transparent and consistent manner.

Finally, we expect that the Platform on Sustainable Finance and the European Commission will further strengthen the engagement with stakeholders to draw on their insights and direct experiences in sustainable and impact investing in order to make the social taxonomy more attuned to diverse contexts and relevant for diverse stakeholder groups.

Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. **Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.**

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Useful links

[Call for feedback document \(https://ec.europa.eu/info/files/2021-social-taxonomy-report-call-for-feedback-document_en\)](https://ec.europa.eu/info/files/2021-social-taxonomy-report-call-for-feedback-document_en)

[Draft report on a social taxonomy \(https://ec.europa.eu/info/files/210712-sustainable-finance-platform-report-social-taxonomy_en\)](https://ec.europa.eu/info/files/210712-sustainable-finance-platform-report-social-taxonomy_en)

[More on the publication of the 2 draft reports \(https://ec.europa.eu/info/publications/210712-sustainable-finance-platform-draft-reports_en\)](https://ec.europa.eu/info/publications/210712-sustainable-finance-platform-draft-reports_en)

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[Platform on Sustainable Finance \(https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en\)](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/overview-sustainable-finance/platform-sustainable-finance_en)

[Specific privacy statement \(https://ec.europa.eu/info/files/2021-social-taxonomy-report-specific-privacy-statement_en\)](https://ec.europa.eu/info/files/2021-social-taxonomy-report-specific-privacy-statement_en)

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