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DG Enterprise and Industry
Unit D.1 – Entrepreneurship and Social Economy
European Commission

Opinion / Public consultation about Corporate Social Responsibility (European Commission’s strategy on CSR 2011-2014: achievements, shortcomings and future challenges)

First of all, a lot of thanks to DG Enterprise and Industry (European Commission) for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

- This opinion does not contain:
- any business secrets
 - any trade secrets
 - any confidential information.

This opinion is public.
DG Enterprise and Industry can add the PDF file of this opinion to a relevant web page.

Annex 1 holds information about previous consultations.
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]

41

42 1. Amount of the background material

43

44 Consultation ¹ web page links to several documents (PDF) and several web pages. I have not read
45 all documents, and therefore this opinion concentrates ***ONLY*** on reporting about Corporate Social
46 Responsibility (CSR).

47

48 2. Possibly redundant guidelines for corporate social responsibility?

49

50 Like the background material indicates, there are several (proposed) guidelines for corporate social
51 responsibility: e.g. OECD, United Nations and European Union.

52

53 3. Consolidating different guidelines

54

55 One option is to consolidate different guidelines into a single easy-to-read document. In the
56 previous consultations I have advocated easy-to-read and well-revised documents for general
57 consumption (citizens, companies, etc.)

58

59 **Proposal 1: European Commission could advance a project for consolidating different**
60 **corporate social responsibility guidelines to a single easy-to-read and well-revised**
61 **document.**

62

63 I have to reiterate, that readability is the main issue for different guidelines. With easy-to-read
64 guidelines, it should be easier for different stakeholder groups to understand different requirements
65 related to corporate social responsibility.

66

67 4. Some contributions from the previous consultations?

68

69 One of the main contributions from the previous consultations has been simplified descriptions of
70 information technology. In many consultation documents, there has been quite ambiguous
71 descriptions about information technology in different application fields.

72

73 One simple conception of information technology solutions is the following figure.

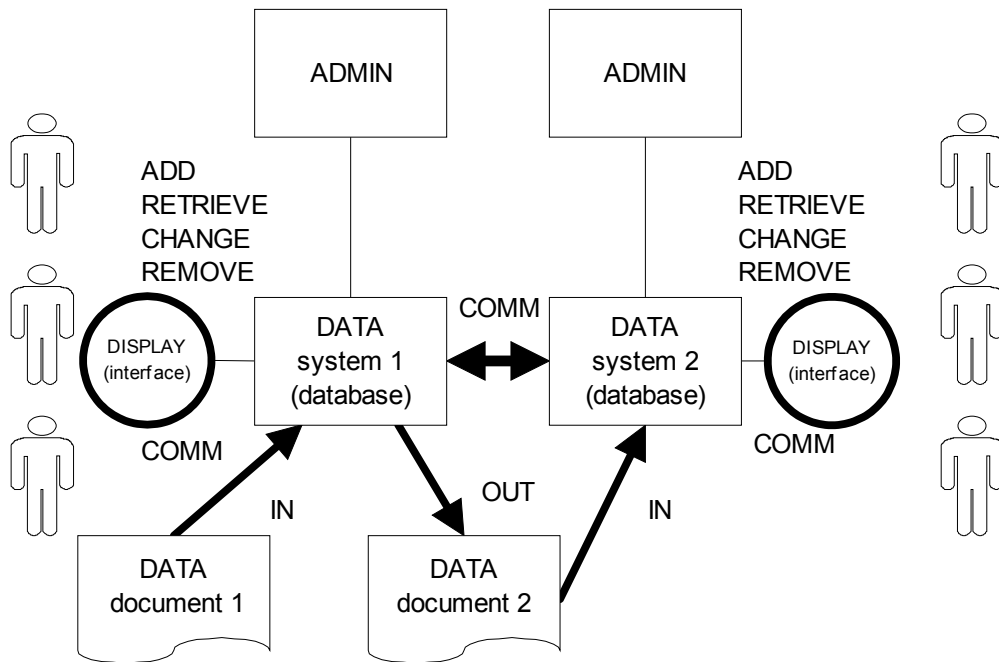
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75 The figure gives us four basic functions: add, retrieve, change and remove. Then there are databases
76 and documents used in different systems. Users use different displays (interfaces). Different
77 systems need administration (also maintenance) for keeping a system functional. Then there is
78 communication (also standards) for direct and indirect usage of an information system.

79

80 [Continues on the next page]

1 http://ec.europa.eu/enterprise/policies/sustainable-business/corporate-social-responsibility/public-consultation/index_en.htm, Web page of this consultation



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Next table gives us some possibilities for assessing possibilities for open solutions and closed solutions.

	Owner? Member? Agreement?	OPEN	CLOSED
1. Device / Machinery			
2. Operating system			
3. Program(s)			
4. Data models / Conceptual models		This consultation??	
5. Documents			
6. Databases			
7. Communications			
8. Retrieve / Interface / Display			
9. Add / Interface / Display			
10. Remove / Interface / Display			
11. Change / Interface / Display			

86

87 It can be concluded, that this consultation is not (yet) about technical details.

88

89 This consultation is mainly about administrative procedures and about reporting corporate social
90 responsibility. The need for technical systems can be assessed later.

91

92 In the previous consultations I have advocated following solution as the maximum solution:

93

94 * public sector institute owns the machinery and processor of the information system

95 * the machinery and processor are based on relevant open standards

96 * the operating system is based on an open-source solution

97 * public sector institute owns the source code of the information system

98 * public sector institute owns the database of the information system

99 * the database is based on open-source solution and on relevant open standards

100 * public sector institute owns all data in the information system.

101

102 Naturally, there can be solutions, which are not based on the maximum solution.

103

104 **5. Actual reality / Different standards and standards versions**

105

106 Previously I have advocated open standards for different information systems.

107

108 It is quite normal situation in the information technology field that there is competing standards for
109 some application field. Therefore there are all the time ongoing “standards wars” or “format wars”.
110 The information technology standards tend to be interrelated and one “standards war” or “format
111 war” can lead to another similar situation.

112

113 Previously I have advocated open standards, even though in some cases open standards are not de
114 facto standards. In practice public sector has very important role, when some standards are
115 competing in the market place. Because public sector has a considerable buying power due to its
116 purchasing (power), and therefore public sector can sometimes direct markets to certain standards.

117

118 Therefore, there should be serious vigilance when assessing different standards and “standards” in
119 some application fields.

120

121 However, creating a new standard means actual both administrative and technical work, and in
122 some cases creating a new standard can last quite long. There are a lot of different standard setting
123 organisations (SDO), and one comprehensive list is provided ² for us by ConsortiumInfo.org.

124

125 **Proposal 2: European Commission (DG Enterprise and Industry) could assess the**
126 **current standards used when reporting corporate social responsibility.**

127

128 **Proposal 3: European Commission (DG Enterprise and Industry) could assess current**
129 **standardisation efforts of different standard setting organisations (SDOs) related to**
130 **reporting corporate social responsibility.**

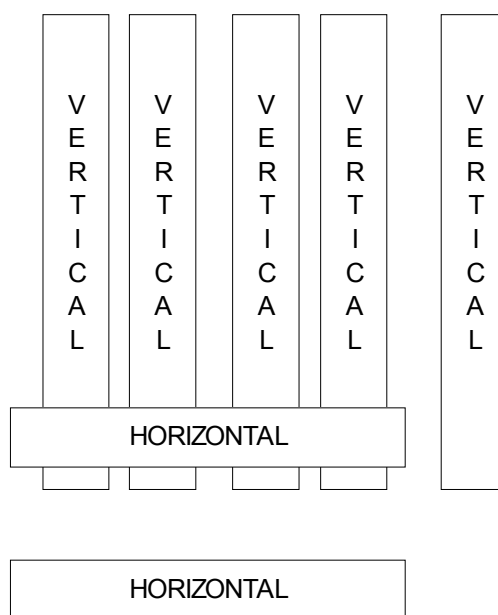
2 <http://www.consortiuminfo.org/links/linksall.php>, Standard Setting Organizations and Standards List

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Proposal 4 : European Commission (DG Enterprise and Industry) could have reasoned opinions for creating new standards for reporting about corporate social responsibility.

Note: However, developing totally new standards will take some time and needs actual workforce creating efficient standards.

6. Supporting and/or developing different standard types?



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One of the main themes can be division standards: horizontal standards and vertical standards. What this means? Generally speaking, different ICT solutions will implement a large collection of different standards: open standards and closed standards. In many cases, different ICT solutions do not work together and this might not constitute a problem. However, in many cases different ICT solutions has to work together seamlessly – possibly without further problems.

Proposal 5: There could be separation of horizontal standards and vertical standards.

Proposal 6: There could be different standardisation efforts to horizontal standards and vertical standards.

Proposal 7: Developing (and possible funding of development) horizontal standards should favoured in the development of new and/or revised standards.

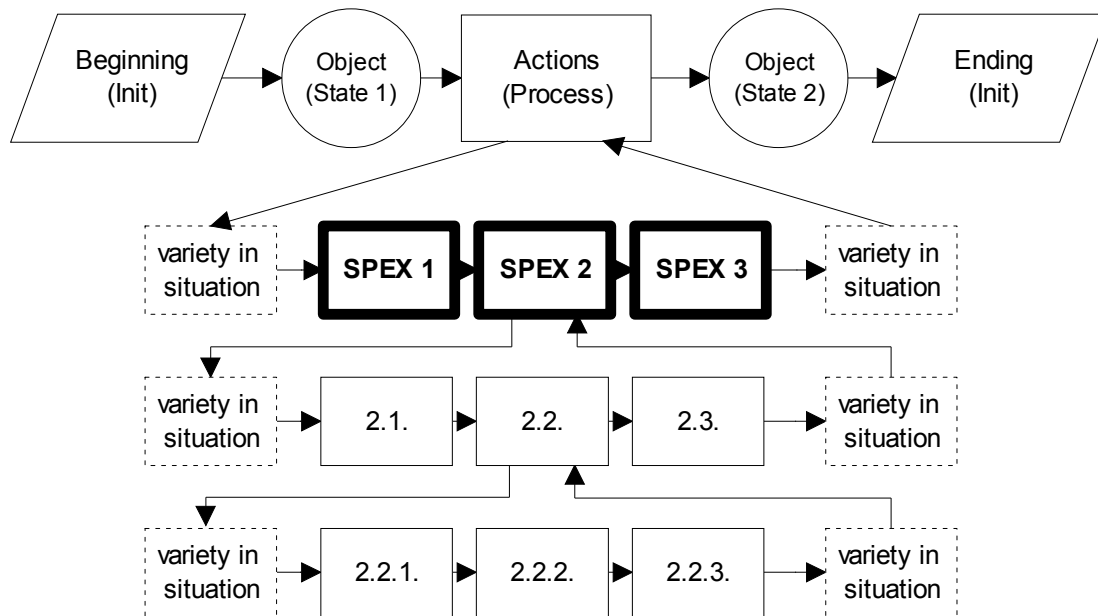
An example can be different email standards. There are numerous email systems developed with numerous technologies (vertical), but the cooperation between numerous email systems is possible with different (horizontal) email standards.

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Note: The number of redundant standardisation efforts should be minimal.

7. Standardisation of interfaces for different stakeholders (companies, customers, etc.)

In previous consultations I have advocated standardisation of interfaces. There are different processes (Beginning → Actions → Ending), which can be described in different levels of details.



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There can be highly detailed points in different processes (SPEX), which could be standardised.

Proposal 8: There could be a project for modelling different processes.

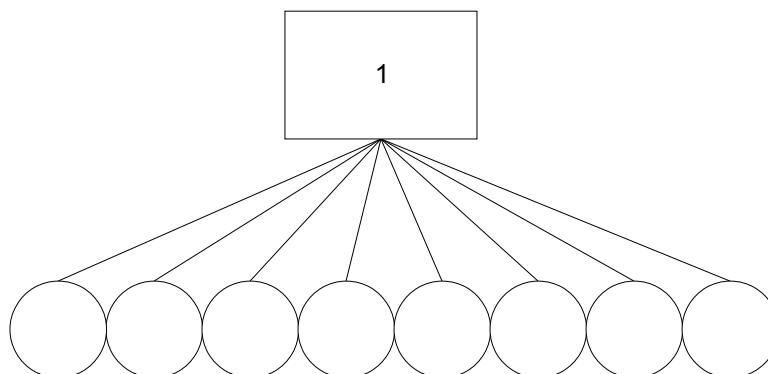
Proposal 9: Some parts of the processes could be standardised for interfaces (SPEX) for different stakeholders.

Proposal 10: Some standardised customer interfaces (SPEX) could be used for having better service processes for different stakeholders.

179 It can be noted, that different actors can naturally have other non-standardised interfaces for
180 different processes, and there is nothing wrong with that approach. Also, we have to assess the need
181 for several interfaces. In other words, different stakeholder groups need different interfaces.

182
183 In the previous consultations documents I have explicated the need for standardisation of some
184 interfaces. In practical reality, there can be different information technology applications for the
185 same operations. It could be feasible to create different standardised interfaces, which can be
186 implemented with different technologies.

187

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Proposal 11: There could be a project for analysing the quality and the quantity of different interfaces for different stakeholder groups.

191

Proposal 12: European Commission could advocate standardised user interfaces in different levels.

195

Naturally, there can be even tens of different user interfaces depending on the nature of different systems. The actual reality is very complex. In practical terms there are several situations:

198

- * systems must communicate directly with each other
- * there will be several communications methods for direct communication
- * there are different standards for direct communication
- * data in the system is added by processing different documents
- * data from the system is extracted and loaded to different documents
- * there are different standards for different documents
- * there will be several types for different documents
- * there are several displays / interfaces to system(s)
- * there are several user groups.

208

One solution can be standardisation efforts for different interfaces in several systems. The European Commission could work with global and regional partners for creating standardised user interfaces for different stakeholders. These standardised user interfaces could then be implemented by different information systems.

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Proposal 13: The Commission can could support work, which rigorously develops and tests different interfaces for different purposes.

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In reality there can be some applications (e.g. A, B, C) for the same operations, and there can be different providers for the same solutions. IF every solution has a different interface, there can be a serious hindrance with the needed education for a new interface. When there are some standardised interfaces (SPEX), the efforts for learning of a new interface can be minimised.

221

222 **8. More and more new identifiers (ID)**

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224 In the previous consultations there has been discussion about different identifiers (ID) in the
225 different systems. It can be noted from the previous opinions, that there will be several and different
226 identifiers (ID) for different levels. In the European Union level, there can be several identifiers
227 (ID), e.g. following:

228

229 * global identifiers (ID)

230 * EU-wide identifiers (ID)

231 * general member state identifiers (ID)

232 * several identifiers (ID) in a member state.

233

234 It can be noted, that some member states (EU) are federations, and different federal states can have
235 their own identifiers (ID).

236

237 More IDs is one of the consequences of digitalisation (of everything). The ID is identifier in an
238 information system. Examples of these identifiers are following:

239

240 1) Facebook ID for an individual person

241 2) Facebook ID for the individual up-dates of individuals

242 3) Data Universal Numbering System (D-U-N-S)

243 4) Reuters instruments codes (RICs)

244 5) Social security code for individual citizens in an European Union member state

245 6) Business identity code for a company in an European Union member state

246 7) Value added tax code for a company in an European Union member state.

247

248 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
249 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
250 of using IDs from privately owned information systems.

251

252 Social security codes and tax identifier codes are examples of publicly owned information system,
253 and use of public identifiers have spread to several private systems. E.g. in Finland the social
254 security code is so prevalent, that the private companies can possibly combine information from
255 numerous private information systems. Naturally, these information combination efforts raise
256 serious questions about the rules and regulations of combining information from private
257 information systems.

258

259 **Proposal 14: There could be a systematic project to collect relevant information of**
260 **different identifiers: e.g. global, EU-wide, regional and national.**

261

262 When information about relevant identifiers is collected, there could be a serious assessment of
263 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
264 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

265

266 **Proposal 15: The Commission could assess nature of different identifiers.**

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268

Proposal 16: The Commission could start serious negotiations with some providers of identifiers.

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Note: Creating totally new identifier (ID) will take some time and needs actual workforce for standardisation efforts for creating a new identifier (ID).

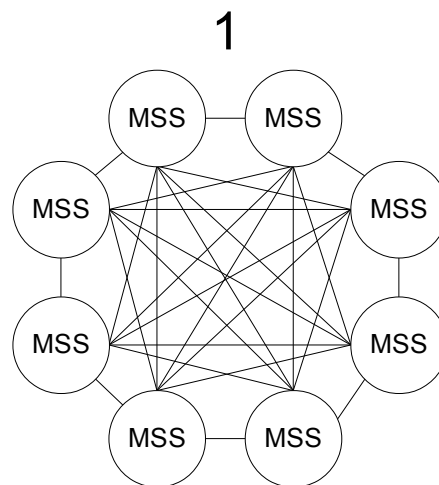
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9. Avoiding redundant work

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(MSS = a member state information system)

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In member states (EU) there are hundreds of different information systems (MSS = as member state information system). It can be concluded, that these systems are layered in different ways and implement several standard (technology) generations. Generally speaking, there can be several many-to-many connections, which are very cumbersome to implement and maintain.

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Generally speaking, in different members states (EU) there are unique situations and unique information systems, when creating cooperation between different copyright holder. These information system can be very specialised, and we can call them as Member State Systems (MSS). The other extreme would be, that there would be just only one system (MSS) in a member state system, and it could be connected to just one European contact point (EUCP).

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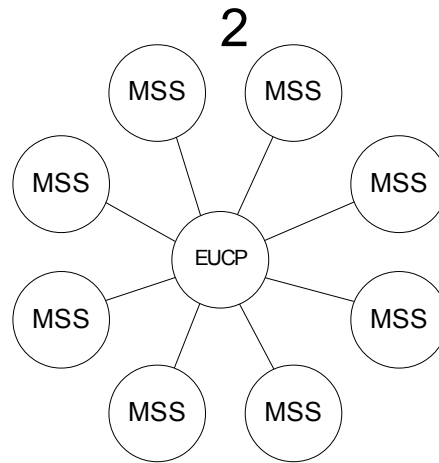
In the European Union level there is need to extract information from different member state systems, and then there is a European contact point (EUCP) for this cooperation between different information systems.

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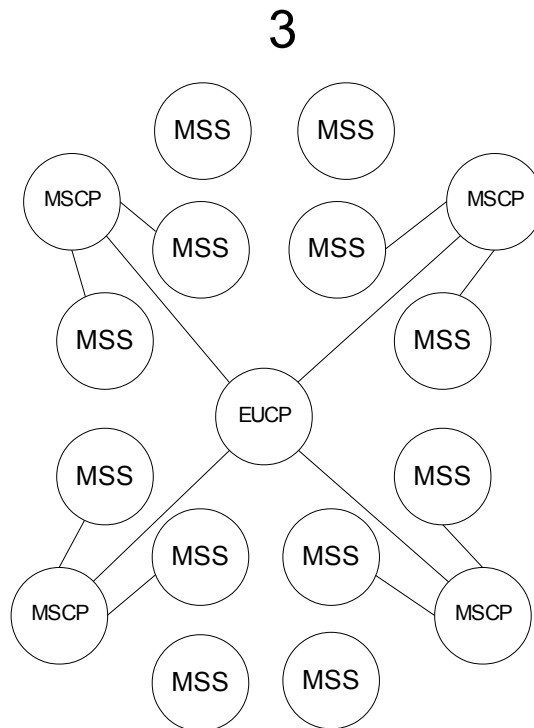
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(MSS = a member state information system)
(EUCP = European Contact point)

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300 The practical reality is, that there will be several systems (MSS) in different member states.
301 Therefore, there should be Member State Contact Point (MSCP) and the European Contact point
302 (EUCP). Then different member states can consolidate own information systems with the Member
303 State Contact Point (MSCP).



(MSS = a member state information system)
(EUCP = European Contact point)
(MSCP = Member State Contact Point)

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308

309 In previous consultations I have advocated of creating separate member state contact points
310 (MSCP) and a separate European Union contact point (EUCP). In this way it easier for member
311 state to consolidate different information system with their own timetable.

312

313 There can be Member State Contact Points (MSCP), which integrates member state systems
314 (MSSs), and Member State Contact Points (MSCP) integrate to the European Contact Point
315 (EUCP). In reality there are a huge collection of different Member State Systems (MSSs), which are
316 constructed with wide variety of technologies.

317

318 **Proposal 17: The Commission should start implementing the proposed standards from**
319 **European Union contact point(s) (EUCP) to member state contact points (MSCP).**

320

321 Therefore, there should be Member State Contact Point (MSCP) and the European Contact point
322 (EUCP). Then different member states can consolidate own information systems with the Member
323 State Contact Point (MSCP).

324

325 **Proposal 18: There could be one European-wide contact point.**

326

327 **Proposal 19: There could be one European-wide identifier (ID).**

328

329 **Proposal 20: The European-wide identifier (ID) could refer to member state identifiers.**

330

331 **Proposal 21: Member states can consolidate own information systems**

332

333 **Proposal 22: Member states could have one contact point for European-wide**
334 **cooperation.**

335

336 **Proposal 23: Global issues could be assessed.**

337

338 Like said before, there can be several non-European identifiers (ID), and cooperation with global
339 IDs is one issue.

340

341 **10. Example of standards / Different information feeds**

342

343 In the previous consultations I have used RSS feeds as an example.

344



345

346

347 To be precise, there are some standards for RSS feeds: RSS 2.0³ standard and Atom^{4 5} standards.

3 <http://www.rssboard.org/rss-specification>.

4 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

5 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

348 There are different systems, which comply with these example standards (RSS and Atom)
349 differently.

350

351 It can be said, that there is need for different information feeds between different systems. Like said
352 before, different actors can assess different existing standards in order to avoid redundant (even
353 useless) standardisation.

354

355 **11 .Organising more technical consultations?**

356

357 **Proposal 24: DG Enterprise and Industry could organise more technically oriented**
358 **consultations based on results of this consultations.**

359

360 **Proposal 25: Some possible issues for new consultations could be following:**

361

362 * **identifiers in different levels (Member state, EU-wide, global)**

363 * **assessment of different standards**

364 * **technical consultation about the usable technologies for reporting corporate**
365 **social responsibility.**

366

367 **Good luck !!!**

368

369 This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
370 opinions. This remains to be seen.

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372 [Continues on the next page]

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

EN: Opinion 1: Review of the rules on access to documents

http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century

http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines

http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft

http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress

http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission

http://www.jukkarannila.fi/lausunnot.html#nro_19

- 418 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
419 http://www.jukkarannila.fi/lausunnot.html#nro_20
420
- 421 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
422 http://www.jukkarannila.fi/lausunnot.html#nro_21
423
- 424 EN: Opinion 23: Public consultation on the review of the European Standardisation System
425 http://www.jukkarannila.fi/lausunnot.html#nro_23
426
- 427 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
428 http://www.jukkarannila.fi/lausunnot.html#nro_27
429
- 430 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
431 http://www.jukkarannila.fi/lausunnot.html#nro_28
432
- 433 EN: Opinion 30: Internet Filtering
434 http://www.jukkarannila.fi/lausunnot.html#nro_30
435 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
436
- 437 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
438 http://www.jukkarannila.fi/lausunnot.html#nro_32
439
- 440 EN: Opinion 34: REMIT Registration Format
441 http://www.jukkarannila.fi/lausunnot.html#nro_34
442 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
443
- 444 EN: Opinion 35: Exploiting the employment potential of the personal and household services
445 http://www.jukkarannila.fi/lausunnot.html#nro_35
446
- 447 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
448 http://www.jukkarannila.fi/lausunnot.html#nro_37
449
- 450 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
451 http://www.jukkarannila.fi/lausunnot.html#nro_39
452
- 453 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
454 http://www.jukkarannila.fi/lausunnot.html#nro_40
455
- 456 EN: Opinion 41: AT.39398: observations on the proposed commitments
457 http://www.jukkarannila.fi/lausunnot.html#nro_41
458
- 459 EN: Opinion 42: Opening up Education
460 http://www.jukkarannila.fi/lausunnot.html#nro_42

6 <http://www.cen.eu/> (Accessed 2 July 2012)

7 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

461

462 EN: Opinion 43: Publication of extracts of the European register of market participants

463 http://www.jukkarannila.fi/lausunnot.html#nro_43

464 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

465

466 EN: Opinion 44: Evaluation policy guidelines

467 http://www.jukkarannila.fi/lausunnot.html#nro_44

468

469 EN: Opinion 45: About ICT standardisation

470 http://www.jukkarannila.fi/lausunnot.html#nro_45

471

472 EN: Opinion 46: Review of the EU copyright rules

473 http://www.jukkarannila.fi/lausunnot.html#nro_46

474

475 EN: Opinion 51: European Area of Skills and Qualifications

476 http://www.jukkarannila.fi/lausunnot.html#nro_51

477

478 EN: Opinion 52: Trusted Cloud Europe Survey

479 http://www.jukkarannila.fi/lausunnot.html#nro_52

480

481 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

482 http://www.jukkarannila.fi/lausunnot.html#nro_53

483 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

484

485 EN: Opinion 55: European Energy Regulation

486 http://www.jukkarannila.fi/lausunnot.html#nro_55

487 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

488

489 EN: Opinion 59: Green paper on mobile Health

490 http://www.jukkarannila.fi/lausunnot.html#nro_59

491

492 EN: Opinion 60: Cross-border inheritance tax problems within the EU

493 http://www.jukkarannila.fi/lausunnot.html#nro_60

494

495 EN: Opinion 61: European Register of Products Containing Nanomaterials

496 http://www.jukkarannila.fi/lausunnot.html#nro_61

497

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503 [Continues on the next page]

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ANNEX 2

507 DISCLAIMERS

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509 Legal disclaimer:

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511 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

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541

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546 The English explanation is on the following web page:

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548



549

550

8 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.