

ADVOCACY PLAN

Corporate Sustainability Due Diligence Directive

What is the issue and why is it important? (max 200 words)			
<p>The Corporate Sustainability Due Diligence Directive (CS3D) will impose burdensome obligations for companies (potentially including SMEs) to conduct due diligence throughout their whole value chain (including all their direct and indirect upstream/downstream business relationships).</p> <p>The CS3D could make companies liable in national courts for adverse human rights and environmental impacts that they did not directly cause and includes unnecessary provisions on corporate governance and directors' duties which will heavily impact the operating model of EU companies.</p>			
Key Orgalim objectives			
1. Ensure SMEs remain excluded from the scope of the CS3D			
2. Limit the scope of due diligence obligations for companies to tier 1 direct suppliers of the upstream supply chain, located outside the EU and EFTA			
3. Elimination of provisions on corporate governance, directors' duties and civil liability.			
Institutional Process/Advocacy milestones			
When	Development	Orgalim advocacy	Members' advocacy suggestion
23 February 2022	Publication of legislative proposal	Joint letter co-signed with Ceemet and shared with key Commission, Parliament and Member State stakeholders	Engagement with national governments and selected MEPs
27 September 2022		Orgalim participated in a roundtable event on the CS3D organised by the EP Rapporteur	
1 December 2022	Council General Approach		Engagement with national governments and selected MEPs
7 November 2022	Publication of Draft Report by lead Committee in EP	Development of a position paper in response to the EP Draft report, shared with key MEPs	Engagement with national governments and selected MEPs
January 2023		Joint statement with other 26 EU trade associations shared with key Commission, Parliament and Council Stakeholders	
February 2023		Development of a paper providing recommendations (support, rejection) on amendments presented in EP – shared with key MEPs	

25 April 2023	EP lead committee adopts Draft Report		Engagement with national governments and selected MEPs
26 April		Orgalim spoke at EFM event on due diligence, with one Commission representative and several MEPs	
May 2023		Joint statement on the CS3D co-signed with other 35 EU trade associations	
1 June 2023	EP adopts negotiating position in Plenary		Engagement with national governments and selected MEPs
June 2023-ongoing	Trilogue negotiations	Orgalim developed a new position paper with trilogues recommendations and shared it with key Commission, EP and member states stakeholders	Engagement with national governments and selected MEPs

Key decision-makers (10 max)

Name	Institution / Role	Rationale	Relationship w/ Orgalim
Dan Dionisie	HoU A3, Company Law, DG JUST	Chef de File	Received Orgalim position paper
Zsolia Kerecsen	Team Leader, Corporate Governance, DG JUST		Engagement at EFM event on the CS3D on 26 April
Lara Wolters	MEP (S&D, NL)	Rapporteur (JURI)	Orgalim participated in Roundtable on CS3D organised by MEP Wolters on 27 September 2022
Axel Voss	MEP (EPP, DE)	Shadow Rapporteur (JURI)	Orgalim participated in several stakeholder meetings organised by the assistant
Adrian Vazquez Lazara	MEP (RE, ES)	Shadow Rapporteur (JURI)	Received Orgalim position papers
Karen Melchior	MEP (RE, DK)	Coordinator (JURI)	APA met on 3 February 2023
Heidi Hautala	MEP (Greens, FI)	Shadow Rapporteur (JURI)	Received Orgalim position papers
Jorge Buxade Villalba	MEP (ECR, ES)	Shadow Rapporteur (JURI)	APAs met on 23 February 2023
Sebastian Schmitz	Permanent Representation of Germany to the EU	Company law and intellectual property counsellor	Met on 12 April 2023
Javier Dominguez Viera	Permanent Representation of Spain to the EU	Economic and financial counsellor	Participated in meeting of Corporate Sustainability TF on 4 April 2023

Orgalim Team

Lorenzo Livraghi, Senior Adviser – Trade and Industrial Policy (lead until 13 October 2023); Ivana Jakovljevic, Adviser – Industrial Transformation (lead as of 13 October 2023)

Lead Working Group and/or TF: Corporate Sustainability TF

Chair, Vice-Chair: Andreas Brunsgaard (DI), Karin Aase (Teknikföretagen)