Stichting Eumedion
T.a.v. Drs. P.A.M. Bos
Zuid-Hollandlaan 7
2569AL Den Haag

Our ref: RJ-Div. 6014
Direct dial: Tel.: (+31) 20 301 039
Date: Amsterdam, March 5, 2020
Re: Green Paper 'Towards a global standard setter for non-financial reporting'

Dear members of Eumedion,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to comment on the Eumedion Green Paper 'Towards a global standard setter for non-financial reporting'.

Overall, the DASB welcomes the Green Paper because it addresses an important topic that is currently discussed in many countries and is gaining urgency. The overall view of the DASB, which is elaborated hereafter, is that a) international guidance towards common metrics and consistent disclosure of non-financial information is preferable to the current diverse situation, b) support by major national and international stakeholders is essential and c) any local standard setting initiative should not hinder the developments of global guidance or standards on disclosure of non-financial information.

a) International guidance or standard setting is preferable
The opinion of the DASB is that it would be very useful when an international body or institute would coordinate the development of guidance and/or the standard setting regarding the disclosure of non-financial information by companies. The current diverse situation, with many initiatives for disclosure and several forms of non-financial information, is too complex and often less comparable and therefore less useful for stakeholders. A common framework is needed that ensures consistent, comparable and reliable reporting of non-financial information in a global context that targets a diverse group of stakeholders. The DASB discussed that maybe a more practical solution would be to first collect relevant worldwide best-practices of disclosure of non-financial information, which in due time may evolve to (development) of global standards.

b) Support by major stakeholders is essential
The DASB agrees with Eumedion that the governance model and track record of the IASB as financial reporting standard setter is unprecedented. However, the DASB would like to emphasise that the global acceptance of IFRS has much benefited from the support of IOSCO and the European Union. It is not obvious that the IFRS foundation has a similar position in the area of non-financial information. DASB notes that also the United Nations have made promising progress in developing their Sustainable Development Goals.
DASB believes that for any global initiative, also in respect of non-financial reporting, clear support of major national and international stakeholders and jurisdictions is essential. Such support is even more important than the organisation, institute or authority that will actually develop guidance or standards. A global solution is obviously desirable, although it would appear to be a challenge to achieve worldwide consensus on this topic.

c) Local initiatives should not hinder the development of global standards
The abovementioned observations are also relevant to the practical question that, if the preferred global solution for harmonised guidance or standard setting regarding non-financial information is not likely to be achieved in due time, a 'second best' option would be to start with 'regional' or 'local' standard setting. For instance, the DASB understands the merits of a European initiative in this respect, which may seem appropriate for practical and political reasons. However, the DASB believes that it is important that any such initiative is not counter-productive, in the sense that it should not imply any delay or maybe even be an obstacle for a global standard setting process or a subsequent move to global standards.

We will be pleased to give Eumedion any further information that you may require.

Yours sincerely,

prof. dr. Peter Sampers
Chairman Dutch Accounting Standards Board