

**Finance Finland's (FFI) response to the inception impact assessment for proposal for a Directive/Regulation of the European Parliament and of the Council for a European single access point for financial and non-financial information publicly disclosed by companies (ESAP)**

- Finance Finland welcomes the European Commission's plan to streamline company reporting (both financial and non-financial) in the EU. We have called for a centralized ESG data register and think that accessibility to sustainability data should be the priority in building ESAP.
- Second objective for ESAP should be that companies' reporting gets easier, instead of making it yet another recipient of financial or non-financial reporting that would only add to companies' administrative work.
- Third, a proper administration for ESAP needs to be ensured. It should be operated by a public entity or a public-private partnership to prevent a situation of private monopoly. We support open access to ESAP for different members of society, and the data should be available for free or at a reasonable cost.

The increased demand and need for ESG data, stemming in part from market developments on the one hand, and regulatory demands on the other, has led to a situation where financial sector is in urgent need for a system that ensures access to that data. While we support streamlining reporting of both financial and non-financial content, the need for non-financial public data is more critical, as we currently lack any system for its EU-wide distribution.

The taxonomy regulation and the future updated non-financial reporting directive provide a natural foundation for reporting to ESAP, but we also want to stress the data needs created by the sustainability disclosures regulation. ESAP should be a tool for financial sector to comply with the sustainable finance regulations.

Companies already face several overlapping reporting obligations on the financial reporting side. ESAP should not add to that but ensure that the existing reporting channels assemble the data to a single register, ESAP. It should be considered whether ESAP could eventually lead to decreasing of parallel financial reporting.

The build-up and management of ESAP could be done by an EU statistical center or by a public-private partnership. The register is intended to serve both public and private needs, so most of its funding should come from the EU's budget. For the data to be truly available to all interested parties, it should be offered for free or at a reasonable cost.

ESAP should be open to companies outside the EU as well, having potential to develop into a global (ESG) data platform if companies outside the EU would adopt the same sustainability reporting standards.

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