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Public Comment

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Hello,

Please find in the attached documents additional metrics that consider animal-welfare, animal-friendliness, and vegan topics.

Hereunder is a development that underlines to what extent why veganism and animal friendliness are material for the reasonable investor.

SASB's 2017 Public Comment period

According to some reports and statistics, people that eat and consume strictly vegan represent 1% of people in the US¹, but if we consider people who support veganism and animal-friendly charities this number increases. For instance, the well-known animal-friendly PETA indicates having 6.5 million members and supporters², which makes the ratio grow up to 2% related to the 326 million people in the United States, by considering only one animal-friendly association.

Furthermore, Vegan is a business trend and its economic weight is growing and heavier³ at a fast pace: demand for Vegan food that has spiked by 140%, the vegan market in China predicted to rise by 17% until 2020, demand for vegan and vegetarian food that has increased by 987% in 2017, nearly 50% of Americans support the ban of slaughterhouses.

And it is not only about food, a significant number of industries are directly concerned. Consider Tesla in 2017 that has abandoned animal leather seats for vegan seats⁴. It is a proof of a flourishing innovative car company at the cutting edge of technology that made the choice of veganism and animal-free exploitation. Consider Ornix⁵, a Swiss-made glass, or 4birds⁶, a French-made glass, that can be seen by birds and remains transparent to human eyes. These innovations on one hand save birds from crashing themselves into windows, and on the other hand are profitable to companies and investors. Other inventions as synthetic liver⁷ or in vitro lung⁸ are current commercial alternatives to animal testing and killing since they enable test the reaction of the human body to diseases, drugs and toxic chemical substances.

Considering the growing vegan and animal friendly business trend, its weight in the economy, and according to the Supreme Court's definition of materiality with the probability / magnitude test, animal friendly and vegan topics are material because their non-disclosure in the 10-K and 20-F SEC filings for a certain number of industries misleads the reasonable investor. In addition, the necessity to add vegan and animal-friendly metrics complies with 2010 SEC's climate change guidance, since a vegan economy

would positively profit to the mitigation of the climate change: stopping animal exploitation could reduce by one third of gas emission⁹. That are the reasons why, we propose to the SASB to add the following vegan and animal-friendly performance indicators and metrics to a certain number of industries in priority. The metrics proposed are the results of our thinking during our preparation to the FSA credential level 1 and while analyzing and rating the top 120 French companies publicly traded on Euronext (the biggest ones are listed on US exchanges too). The rating and most of the analysis with their references are currently published on our website. The remaining analysis will soon be published. Our best regards,
Van Dinh TRAN

<http://www.veganfinance.org/rating-fr/>

1 <http://veganbits.com/vegan-demographics-2017/>

2 <https://www.peta.org/donate/membership-services/>

3 <https://www.livekindly.co/vegan-statistics/>

4 <https://electrek.co/2017/07/22/tesla-seat-options-now-vegan/>

5 <http://www.ornilux.com/>

6 <https://www.saint-gobain-facade-glass.com/products/4bird>

7 <http://www.empiriko.com/biomimiks>

8 <http://www.epithelix.com/>

9 <https://www.theguardian.com/global-development/2013/sep/26/greenhouse-gas-emissions-livestock>

Industry	topics	Metrics that should be added in 10-K, 20-F and 40-F	Example	Counter-example	Financial Impact	Financial Imp	Description and sources
Media & Entertainment	VEGAN / ANIMAL FRIENDLY	Prohibition of animal abuse content: number of cases of animal abuse detected by the public or by the company/ suppressed / communicated to legal authorities /)	Vivendi company (subsidiary: dailymotion policy US)		Revenue	Goodwill	http://www.veganfinance.org/rating-fr/vivendi/
Hotels & Lodging	VEGAN / ANIMAL FRIENDLY	Nb of vegan and animal-friendly actions proposed	ACCOR hotels offer vegetarian menus, eggs from free-range hens		Revenue	Goodwill	http://www.veganfinance.org/rating-fr/accor/
HOUSEHOLD & PERSONAL PRODUCTS	ANIMAL TESTING AND KILLING	Nb of animal tested (total and by species); percentage of animals killed (all species and by species); percentage of animals saved or rehabilitated (all species and by species)		L'OREAL, BIC	Revenue	Goodwill	http://www.veganfinance.org/rating-fr/loreal/ ; http://www.veganfinance.org/rating-fr/bic/
Biotechnology & Pharmaceuticals	ANIMAL TESTING AND KILLING	Nb of animal tested (total and by species); percentage of animals killed (all species and by species); percentage of animals saved or rehabilitated (all species and by species)		SANOVI, PFIZER, Charles River Laboratories	Revenue	Goodwill	https://www.peta.org/features/dirty-dozen-12-worst-ceos/
MEDICAL EQUIPMENT & SUPPLIES	ANIMAL TESTING AND KILLING	Nb of animal tested (total and by species); percentage of animals killed (all species and by species); percentage of animals saved or rehabilitated (all species and by species)			Revenue	Goodwill	
Biotechnology & Pharmaceuticals and Cosmetics and Chemicals	ANIMAL TESTING AND KILLING	Nb of inventions or alternatives to animal testing (and killing)	Synthetic liver (biomimiks by Empiriko), or in vitro lung (Epithelix) to test diseases, drugs and toxic chemical substances		Revenue	Goodwill	http://www.empiriko.com/biomimiks ; http://www.epithelix.com ; https://www.peta.org/issues/animals-used-for-experimentation/alternatives-animal-testing/
Chemicals	ANIMAL TESTING AND KILLING	Nb of tested animals / Nb of animals killed or died / Nb of animals rehabilitated (total and by species)	The Solvay company disclose the nb and species of animals "used"		Revenue	Goodwill	http://annualreports.solvay.com/2016/en/extra-financial-statements/gri-content-index/social/animal- https://www.saint-gobain-facade-glass.com/products/4bird ; http://www.veganfinance.org/rating-fr/saint-gobain/
Construction materials	VEGAN / ANIMAL FRIENDLY	Nb of inventions or innovations to avoid animal killing; nb and percentage of local consultation and monitoring commission before construction	Saint-Gobain Glass industry : create glass visible for birds		Revenue	Goodwill	http://www.veganfinance.org/rating-fr/saint-gobain/
Construction	VEGAN / ANIMAL FRIENDLY	Nb of actions to avoid animal killing or protect biodiversity; nb and percentage of local consultation and monitoring commission before construction	Vinci builds fenced or crossing sections in highways to protect deers	Vinci: decrease of nb of quarries that have set up local consultation and monitoring commission	Costs	Goodwill	http://www.veganfinance.org/rating-fr/vinci/
Automobile	VEGAN / ANIMAL FRIENDLY	Nb of inventions or alternatives to animal killing by automobiles. Use of animal leather Y/N.	Volvo Animal detection system (brakes or avoid) vs nothing for Peugeot & Renault		Revenue	Goodwill	https://www.wired.com/2017/01/volvos-cars-now-spot-moose-hit-brakes/
Auto parts	VEGAN / ANIMAL FRIENDLY	Nb of inventions or alternatives to animal killing by automobiles.		Valeo: no innovation as Animal detection known	Revenue	Goodwill	http://www.veganfinance.org/rating-fr/valeo/
Auto parts	Materials Sourcing	Use of animal leather Y/N precising the species / type (cow, veal, exotic)			Costs	Goodwill	
Automobile	Materials Sourcing	Use of animal leather Y/N precising the species / type (cow, veal, exotic)	Tesla no more animal leather option replaced by premium syntetic leather		Costs	Goodwill	https://electrek.co/2017/07/22/tesla-seat-options-now-vegan/
Car leasing	Materials Sourcing	Use of animal leather Y/N precising the species / type (cow, veal, exotic)		Europcar: use of leather	Costs	Goodwill	http://www.veganfinance.org/rating-fr/europcar/
Real Estate Owners, Developers & Investment Trusts	GOVERNANCE	main tenants list & warehouse portfolio	p 44-47 of ICADE registration document 2016		Cost of Capital		http://www.icafe.fr/en/content/download/15003/171065/version/5/file/2017+04+11+ICADE_DDR2016_VA_V5_bis+CL.pdf
Oil and Gas	ENVIRONMENT, ETHICS and LEGAL MATTERS	Biodiversity impacts: nb of animals killed / number of animals saved or rehabilitated	Total and oil spill		Revenue	Goodwill	http://www.greenpeace.org/international/en/press/releases/2017/BP-and-Total-risk-oil-spill-with-30-chance-of-reaching-Amazon-Reef
Food retailer	VEGAN / ANIMAL FRIENDLY	Nb of killed animals total and per species, per age (not per tons); nb of controversies linked to animal-welfare / animal-cruelty and discussion; nb of measures to avoid animal killing; nb of vegan projects		Carrefour	Revenue	Goodwill	http://www.veganfinance.org/rating-fr/carrefour/
MEAT, POULTRY, & DAIRY	VEGAN / ANIMAL FRIENDLY	total number of animals (and per species) at the beginning of the period / total number of animals (and per species) at the end of the period / Number of animals born during the period (total and per species) / number of animals sent to the slaughterhouse during the period / number of animals who died in the exploitation during the period/ number of animals that were cured by a veterinarian	The vegan and animal friendly investor does not know how many animals are killed. Statitics give often metrics by weight (tons).	Furthermore, we know that some producers do not call the veterinarian to save money, and so the animal will die without anycure. We ask for more transparency and			

Industry	topics	Metrics that should be added in 10-K, 20-F and 40-F	Example	Counter-example	Financial Impact	Financial Imp	Description and sources
MEAT, POULTRY, & DAIRY	ANIMAL WELFARE	percentage of animals produced without mutilation (including teeth clipping, tail docking, dehorning, de-budding, mulesing, beak trimming); percentage of animals that are stunned prior to slaughter; percentage of animals that are transported for more than eight hours (from loading to unloading)- if more precise the number of hours; percentage of animals that are produced in systems that are not considered humane, for example foie gras and white veal.	standards from BFAW		Costs	Goodwill	https://www.bbfaw.com/food-companies/
Restaurants	VEGAN / ANIMAL FRIENDLY	percentage of vegan meals proposed; percentage of vegetarian meals proposed			Revenue	Goodwill	
Restaurants	Supply Chain Management & Food Sourcing	percentage of animals purchased without mutilation (including teeth clipping, tail docking, dehorning, de-budding, mulesing, beak trimming); percentage of animals that are stunned prior to slaughter; percentage of animals that are transported for more than eight hours (from loading to unloading)- if more precise the number of hours; percentage of animals that are purchased in systems that are not considered humane, for example foie gras and white veal.			Costs	Goodwill	
Apparel, Accessories & Footwear	VEGAN / ANIMAL FRIENDLY	Nb of killed animals directly or indirectly supplied (total and per species); nb of controversies linked to animal-welfare / animal-cruelty and discussion; nb of measures to avoid animal killing; nb of vegan projects ;		LVMH with skinned alive crocodiles controversy	Revenue	Goodwill	http://www.veganfinance.org/rating-fr/lvmh/
Airlines, Air Freight & Logistics, Marine Transportation, Rail Transportation, Road Transportation	VEGAN / ANIMAL FRIENDLY	Nb of animals transported (total and per species) / Nb of animals transported for experimentation / nb of animals transported for meat/leather. Nb of procedures to avoid animal killing on the road / on air / on the sea; nb of animals non transported killed; nb of animals that died during transportation; nb and type of procedures to improve animal-welfare during transportation; nb of hours of transportation by ride by species (minimum, maximum, average)		Air France is the only major airline company in the world that is still shipping monkeys to laboratories	costs	Goodwill	http://www.veganfinance.org/rating-fr/air-france-klm/
Airlines	Customer welfare	Nb of complaints received by the Airline company and received by the department of transportation about the company; nb of complaints by type; nb of complaints by nb of flights ratio;			costs	Goodwill	https://www.transportation.gov/sites/dot.gov/files/docs/resources/individuals/aviation-consumer-protection/303556/2018januaryatcr.pdf
Banks, Asset management, Security and Commodity Exchange	ANIMAL WELFARE	Exclusion list and disclosure of: companies that provide animal testing (Yes or No - if Yes percentage) , mutilation on animals (including teeth clipping, tail docking, dehorning, de-budding, mulesing, beak trimming) (Yes or No - if Yes percentage), that do not stun animals prior to slaughter (Yes or No - if Yes percentage), transport animals for more than eight hours (from loading to unloading) (Yes or No - if Yes percentage), produce animals in systems that are not considered humane, for example foie gras and white veal (Yes or No - if Yes percentage)	CARMIGNAC SRI Guidelines integrating the PETA exclusion list	Amundi: no exclusion list based on animal testing / slaughtering / fur & skins / entertainment in comparison with Carmignac company that excludes animal-testing stocks through the PETA exclusion list for the Carmignac emergent fund			https://www.carmignac.fr/uploads/pdf/0001/05/c85abc74a2c4f118f8bd337b03722652dd55d11f.pdf ; http://www.veganfinance.org/rating-fr/amundi/
Banks, Asset management, Security and Commodity Exchange	VEGAN / ANIMAL FRIENDLY	Exclusion list and disclosure of: companies that do exploit animals directly or are harmful to animals indirectly by polluting the environment or by sponsorship against animal welfare	So far no major investment companies has included strict vegan criteria in its exclusion list or fund				http://www.veganfinance.org/