

Your responses:

GSSB Work Program 2017-2019

GSSB Work Program 2017-2019 - Questionnaire

Submitted to GRI on 2016-09-30 11:53.47

Q1:

Overview (lines 2-19): Do you have feedback on the priority work areas outlined in this Draft Work Program? Do you have suggestions for further work areas for the consideration of the GSSB?

No.

The priority work areas are appropriate for the the GSSB work program, would particularly like to emphasise the importance of the collaboration with key partners and participation in collaborative projects to improve the quality of reporting.

Q2:

a) Support the implementation of the GRI Standards (lines 21-35): Do you have feedback on these activities and deliverables? Do you have suggestions for additional activities that aid the implementation of the GRI Standards?

No.

We support your proposals related the implementation of the GRI standards. We would like to stress the importance of clear and early communications to stakeholders to ensure changes are well received and widely adopted.

Q3:

b) Review GRI Standards on a regular basis (lines 36-72): Do you have feedback on these priorities? Do you think other GRI Standards should be higher priorities for review? Do you think human rights reporting and related GRI Standards should be prioritized in 2017?

Yes.

We would suggest that all standards relating to Climate Change and Emissions are considered for review to appropriately accommodate the recommendations of the Task Force on Climate-related Financial disclosures.

We would like to suggest that Human Rights be considered a priority area for review to accommodate where appropriate the UN Guiding Principles Reporting Framework and Guiding Principles on Business and Human Rights. As you have acknowledged significant developments have been made in this area in recent years and legislative requirements are now emerging, such as for example the requirement in the UK according to the Modern Slavery Act 2015 for organisations to develop a credible and accurate slavery and human trafficking statement. A review of the Human Rights standard may also need to include related topics and other standards such as Child labor, Forced labor, Indigenous rights etc.

We agree with the proposal to review the biodiversity standard and we would urge the GSSB to collaborate with members of the Natural Capital Coalition in developing this area. In particular we would note the work of the World Business Council for Sustainable Development, the Convention on Biological Diversity - Business Reporting on Biodiversity and the Cambridge Conservation Initiative (University of Cambridge, Fauna & Flora International, the RSPB, and UNEP-WCMC). The development of this standard must also include links to the Natural Capital Protocol where appropriate.

We would also agree with the proposal to review the effluents and waste standard particularly in light of the recently released Food Loss and Waste protocol from the World Resources Institute. This is a very new but critically important issue for a number of relevant sectors, such as agricultural commodities and food, beverage and tobacco.

Q4:

c) Develop additional Standards on a regular basis (lines 73-89): Do you have feedback on these priorities for new Standards to be developed in 2017? Do you think different topics should be prioritized?

Yes.

We agree with the proposed new standards identified for development, namely tax and payments to governments and toxics. We would however urge the GSSB to consider how their plans and proposals align with existing regulatory requirements such as Brazillian Law 12.305 on Solid Waste or UK Reports on Payments to Governments, and recommendations from intergovernmental organisations such as the OECD and World Bank.

A further priority area could be related to the oceans, marine resources and fisheries, though there are opportunities for companies to identify some relevant content in these areas through other GRI/GSSB environmental standards, companies often struggle to communicate relevant content on performance, strategy, management approach etc. in this area. This area is underdeveloped but a priority given the SDG targets and indicators related to life below water.

We would also suggest that across all standards a renewed emphasis be given to sustainability context, addressing the SDGs and outside-in framing (see SDG Compass) of targets and strategies. Companies currently struggle to respond appropriately to this principle (see - UNEP report Raising the Bar - Advancing Environmental Disclosure in Sustainability Reporting).

Q5:

d) Develop sector-specific content (lines 90-99): Do you have recommendations on high-impact sectors to be covered?

Yes.

GRI should seek to align its sector specific recommendations with the work of the TCFD, CDP and SASB where appropriate. Key priority sectors could include Energy (Oil and Gas etc.), Transport (Automobiles, Aviation etc.), Agriculture (Food, Beverage & Tobacco etc.), Materials (Chemicals, Cement, Steel etc.).

GRI Standards should over time provide a consistent and comparable structure and standard for companies to communicate new sector specific business solutions, activities and actions, and relevant forward-looking information.

Sector priorities should also respond to the work of UNGC, WBCSD, the Columbia Center on Sustainable Investment, UNDP, UN Sustainable Development Solutions Network and World Economic Forum identifying sector specific actions and activities contributing to the Sustainable Development Goals.

Q6:

e) Issue authoritative interpretations and guidance, and maintain an FAQ resource (lines 100-109): Do you agree with these activities and deliverables?

Yes.

Q7:

g) Develop new guidance for specific groups of reporters (lines 122-136): Do you have feedback on high-priority groups of new reporters for which offerings should be developed?

Yes.

We agree with the proposal to further efforts in developing countries and for SMEs. We would emphasise the importance of appropriate guidance for these audiences supporting capacity building.

Q8:

h) Collaborate with key partners to reduce the reporting burden and increase the uptake of the GRI Standards (lines 137-146): Do you have any suggestions for organizations that the GSSB should engage with to reduce the reporting burden on reporters and increase the uptake of the GRI Standards?

Yes.

The GSSB and GRI must seek to develop where appropriate collaborative working relationships with key stakeholders such as SASB, CDP, CDSB, <IR>, TCFD, UNGC and WBCSD. Appropriate interpretive guidance and alignment pieces should be produced in collaboration with the aforementioned organisations.

The GSSB should consider collaborating with key stakeholders developing guidance and thought leadership related to business action on the SDGs. There are technically challenging questions to be considered related to the SDGs and tracking corporate commitments, collective 'business-determined contributions', regulatory requirements and current reporting practice. Relevant stakeholders must explore how disclosure can support international sustainable development objectives and also meet the needs of specific users providing, for example, sector specific information supporting corporate engagement activities (e.g. business solutions for FBA sector related to climate smart agriculture).