



Interfaith Center on
Corporate Responsibility

Inspired by faith, committed to action

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October 10, 2006

Dr. John Ruggie
United Nations Secretary General's Special Representative on Human Rights & Business
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Dear Dr. Ruggie:

We, the undersigned representing faith-based and/or socially responsible investors, thank you for meeting with our representatives on May 11TH in New York City. We found the discussions constructive in helping us understand the complex breadth and scope of the mandate you have been given during a relatively short period of time.

In addition to our concerns related to the importance of identifying core standards of corporate responsibility and accountability, we are writing to encourage you to focus on the following key areas (noted below) in preparation for your final report scheduled for release in Spring of 2007. Please also find two attachments highlighting brief comments on the two related discussion papers posted on the Business & Human Rights Resource Centre website.

Human Rights Impact Assessments (HRIAs)

We recognize that one of your mandates is to “develop materials and methodologies for undertaking human rights impact assessments of the activities of transnational corporations and other business enterprises.” As investors, we believe profoundly that a prudent and comprehensive assessment of human rights risks is essential to minimize and mitigate risks across a whole range of issues and industries. Human rights impact assessments (HRIAs) enable a company to identify, understand, and evaluate the impact of its operations or projects on communities and other stakeholders, at each stage of its development and operation, and as a result minimize potential human rights abuses.

As you know, the Danish Institute for Human Rights has published the *Human Rights Compliance Assessment* (HRCA) and the UN Global Compact published a 64-page draft *Guide to Human Rights Impact Assessments* in June 2006 detailing how human rights issues now constitute a distinct business challenge with close links to risk management. As mentioned in the discussion paper, the 2002 report *Human Rights Assessment of the Proposed Tangguh LNG Project for BP Indonesia* is an example of a human rights risk assessment that is publicly available (in summary form) – one that presented a holistic approach to addressing human rights issues and reflected an unprecedented degree of transparency and accountability.

Recommendation

We welcome and commend your focus on human rights risk assessments. We hope that there will be a consensus around the critical importance of using HRIAs as a stand-alone exercise where necessary – or otherwise embedded within a broader risk assessment process. We strongly encourage that your final report recommends that HRIAs become a standard tool and process across the full range of industries – based on international human rights norms and developed in dialogue with appropriate stakeholders. While HRIAs may be most obviously useful in the extractives sectors, they are also relevant to other sectors such as apparel and footwear, pharmaceuticals, information technology, and agriculture/beverages/food, which also face serious human rights issues posing risks to company reputations and investor confidence. Indeed we believe that highlighting the cross-sectoral importance of human rights risk assessments can be one of the significant, tangible, and enduring outcomes of your mandate.

Disclosure of Non-Financial Performance

Socially responsible and faith-based investors incorporate a wide variety of social and environmental criteria into their investment processes, including corporate human rights performance. We do so because we are committed to using our leverage as investors to encourage more responsible corporate behavior, and to inculcate a deeper understanding and respect for international human rights norms in the corporate community. As investors, we believe that we stand in a unique position to achieve this goal, but we cannot do so without reliable data to allow us to assess corporate performance in this area. We use corporate human rights performance information in a variety of ways, including direct engagement with corporate management, proxy voting, and asset selection. For many of us, this information is material to our investment decisions.

Investor demand for this information is clearly helping to drive greater corporate transparency. As noted in your discussion paper on this topic, thousands of companies now report on some aspect of their social or environmental performance. Few, however, provide reliable and consistent information on their human rights performance, leaving both investors and civil society with an incomplete, and occasionally misleading picture of corporate human rights performance. We fundamentally believe that companies cannot be held accountable without data. The lack of comparable, reliable data on corporate human rights performance should be of concern both to the United Nations, and to corporations that strive to respect international human rights norms.

Recommendation

We commend you for devoting attention to this critically important lever for addressing human rights issues globally. We believe a two-tier strategy for addressing the general lack of reliable data on corporate human rights performance is needed, including a combination of voluntary and mandatory reporting.

We support the Global Reporting Initiative as the leading sustainability reporting format, but we recognize the limitations of a voluntary reporting model. There is a clear need for some form of mandatory reporting in this area in order to establish a level playing field where all companies report basic, baseline data on their human rights performance. Currently, few companies are willing to produce truly transparent reports unless they believe they have “a good story to tell.” This disparity of disclosure creates significant market inefficiencies that mask the true nature of corporate behavior, and enhance already substantial obstacles to meaningful progress.

You note in your discussion paper that a variety of stock exchanges around the world currently require some form of social or environmental disclosure as a condition for listing. In 2002, the Social Investment Forum and a variety of its member organizations submitted comment letters on the New York Stock Exchange’s proposed listing standards, recommending that they include human rights criteria. The Forum, and various individual social investment firms, expressed concern that the proposed reforms failed to address a number of critical areas that lie at the root of public distrust of our markets and corporations, including human rights. Although we are aware that enforcement of these requirements in some of the countries that currently require disclosure is lacking, we strongly support the trend. We would

encourage you to recommend the development of a core set of baseline human rights criteria that the world's major exchanges could be encouraged to include in their listing standards.

We request a face-to-face meeting with you and a representative group of the faith-based and socially responsible investment community this Fall to discuss these issues in further detail. We will contact you shortly to follow up.

Sincerely,

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ATTACHMENT 1 :

COMMENTS ON THE HUMAN RIGHTS IMPACT ASSESSEMENTS DISCUSSION PAPER

The following comments are provided by the faith-based and/or socially responsible investors to Dr. John Ruggie, UN Special Representative on Business and Human Rights to inform the Special Representative's ongoing work. As requested, the following are general comments and responses to the specific issues for discussion posed in the last section of the paper.

Issues for discussion

23. Is the distinction between ESIA's (environment and social impact assessments) and HRIAs (human rights impact assessments) drawn in paragraph 8 accurate and useful?

Comment:

Yes, the distinction in paragraph 8 is useful. While ESIA's are essential, they have not focused expressly and comprehensively on human rights protections *per se* and are insufficient tools to address human rights risks. We believe that HRIAs, conducted in ways consistent with recognized human rights standards and connected to collaborative multi-stakeholder frameworks, can contribute significantly to basic human rights protections. Moreover, HRIAs are critical for companies' ability to assess and in turn act to diminish risks apparent in their operating environments – risks which if unmitigated damage company reputations and investor confidence. In order to encourage necessary actions and protections, HRIAs should draw on both the legal framework of international human rights law and the body of human rights best practice on the part of business – particularly in collaboration with civil society and NGOs – that has emerged over the last several years.

24. Must an HRIA be a discrete exercise, or can it be carried out as part of an ESIA or other similar exercise? Could critical issues be neglected in the absence of a rights-based approach, or will a company more effectively address human rights issues if they are incorporated into existing processes?

Comment:

As your paper mentions, a number of organizations are experimenting with separate HRIAs, and that only one such assessment has been made public in summary form (the BP Tangguh project). While HRIAs are distinct from ESIA's, they can still be carried out as part of an ESIA as long as they are consistent with the accepted framework of international human rights norms and take into account emerging best practices. As investors, we believe that HRIAs must be a critical component of, and integrated into, business policies, decisions and operations. Furthermore, we recognize that companies can have the flexibility, in dialogue with stakeholders, to determine whether human rights issues pertaining to a particular project or country operation should require a discrete stand-alone HRIA or can be addressed as part of a broader risk assessment process. At minimum, discrete stand-alone HRIAs should be employed in situations where human rights risks are apparently most acute. Therefore, they will be most relevant to the extractives sectors and others operating in close proximity to conflict zones and/or indigenous communities. There may be situations where human rights risks are less acute and it may be sufficient to embed human rights risk assessment within a larger ESIA.

25. For many companies the question is not what should be in an HRIA once one is commissioned, but when it is necessary to perform one – especially if they have other assessment activities underway. What level of activity should trigger an HRIA, whether by internal company processes, financing (e.g. per the Equator Principles, export credit agencies or the IFC), or national law? Should a certain level of risk – to either business or citizens – trigger a full HRIA, whereas a lower level might merit a diagnostic tool or preliminary HRIA (comprising desktop research and a few expert opinions rather than extensive consultation) to determine whether further attention is necessary?

Comment:

The level of activity triggering an HRIA should be whenever the management processes together with stakeholder engagement (for example drawing on NGO reports) identifies potential risks. We recommend that the more apparent and acute the risk, the more intensive and comprehensive the HRIA process undertaken.

26. The extent of disclosure of an HRIA, i.e., whether it is published in full, in part, in summary, or not at all – can be variable depending on local circumstances. Where the human rights record of state security forces is poor, multinationals may be reticent to publish an HRIA out of concern that this could create political or legal risks for the company – or in extreme cases, endanger staff. There should be a bias towards transparency wherever possible, but the difficulties of achieving full disclosure also must be recognized. Is it possible to define a minimum standard of transparency?

Comment:

As investors, we place great importance and a high priority on transparency and disclosure, and apply that principle to HRIAs in general. HRIAs must work on the basis of transparency so that these assessments are publicly accessible at all stages. It is especially important for HRIAs to be a transparent consultative process that engages stakeholders that may be affected by human rights violations arising from business projects. However, we recognize that, in some instances, full disclosure may lead to danger or damage to communities, companies, and staff. We understand the need for discretion on the part of companies on whether to disclose HRIAs as full documents depending on security issues in particular. We understand that some interviews may be confidential, particularly those endangering or damaging to staff or local communities if released publicly. While we hope and encourage the disclosure of HRIAs to the extent appropriate, that disclosure should not come at the expense of disclosing acutely sensitive issues that may endanger local communities, staff and others. There needs to be a balance between the need for full transparency and the need to ensure that HRIAs address the most acute risks with the greatest degree of candor.

It is critical that the HRIA process is not viewed as one final report/assessment, but rather a process with findings, goals, targets, remediation plans, and stakeholder voice. In the event that a segment of information is not publicly-released by the company, the HRIA should be labeled as “partial” – as an indicator to the public that disclosure is not complete and full.

27. Some company lawyers are concerned that publicizing recommendations creates liability if the recommendations are not followed. But this concern must be tempered by a reasonableness standard. If an HRIA finds that a company is benefiting from forced labour it could, indeed, be held liable for failing to act on the information – but presumably uncovering and redressing such issues is the purpose of the exercise in the first place. More routinely, not heeding a recommendation that the company create a “drop box” for anonymous comments from community members is hardly likely to raise legal liability issues.

Comment:

Disclosing recommendations does not necessarily create liability. In the apparel/footwear/toy industries, a number of companies have been transparent about publicizing violations in their own or supplier factories. They have also reported on potential remediation plans to correct these problems. In fact, properly developed and implemented HRIAs should uncover and make plans to redress human rights problems, a process that can serve to reduce liability. At minimum, we believe that companies should disclose the following: a) that HRIAs are being undertaken, the purpose of the HRIA and process by which HRIAs are being undertaken (i.e. scope, terms of reference etc.), and b) the basic conclusions and recommendations. Full disclosure needs to be balanced with a need to address the full range of acute risks.

28. There are many public sources for human rights information. The Business and Human Rights Resource Centre is an excellent repository of information; many UN agencies release reports on human rights; Amnesty International, Human Rights Watch, and other NGOs release reports focused on particular regions, companies or issues. The

Country Risk Assessment reports by the Danish Institute for Human Rights, Amnesty International and IBLF's 2002 "Business & Human Rights: A Geography of Corporate Risk", and the Maplecroft mapping tool are examples of how various sources are combined into global overviews. Are there others? Would a single globally credible source for business and human rights be desirable and feasible?

Comment:

The paper has identified a number of excellent sources. We encourage you to include socially responsible investors working on corporate human rights as a source as well. We also emphasize the usefulness of *Conflict-Sensitive Business Practice: Guidance for Extractive Industries* published by International Alert in 2005. The Business & Human Rights Resource Centre is extremely useful and the closest vehicle we have to a "single source," but it is not clear that a single globally credible source is possible or feasible.

29. The companies known to do HRIAs or similar exercises are generally prominent multinationals. Do state-owned enterprises or non-OECD national companies use these tools or have their own? Do smaller companies use these tools, or do they not have the requisite incentives and/or capacity?

Comment:

We understand that prominent multinationals have a greater footprint and visibility on human rights issues. However, we recommend that state-owned enterprises, non-OECD national companies, and smaller companies should also consider undertaking HRIAs. We feel that available tools are adaptable to their needs and should remain so as they continue to be developed. The primary objective is to establish HRIAs where necessary- or as part of a broader human rights risk assessment – as a standard tool and process.

30. HRIAs for private sector projects are currently most often discussed in the context of extractive industries. What other industries have experimented with HRIAs? What is applicable across sectors?

Comment:

HRIA's should be encouraged for more than the extractives industries, such as mining, oil & gas, and forestry. While HRIAs are most obviously applicable to the extractives sectors, particularly in connection with conflict zones and indigenous communities, they are also widely applicable to industries including apparel, footwear, toys, computer, technology, agriculture/food/beverages, chemicals and financial. For example, the apparel and footwear industries have used risk analysis as a part of supply chain management systems to identify regions/countries where labor violations may be highest. The critical issue here is not just the industry *per se* that guides whether HRIAs are applicable or not, but also the category of issue and risk. For example, companies need to assess whether a particular operation or project is located in an area well-known for human rights abuses, has a weak rule of law and governance, in conflict zones where actions of security forces are violent and unaccountable, or where indigenous peoples' rights to "Free, Prior and Informed Consent," traditional community rights and livelihoods are at stake.

ATTACHMENT 2:

COMMENTS ON “REPORTING ON NON-FINANCIAL PERFORMANCE” PAPER

The Issue

1. Public reporting is essential for improving the impact of business activity on human rights. Reporting is a vehicle for greater transparency, accountability, and building trust between companies and their stakeholders. Just as financial disclosure underpins the proper functioning of capital markets, so too can disclosure of social and environmental performance support a high -performing society.

Comment:

At the outset, we would like to suggest that transparent corporate social and environmental reporting should be considered to be a necessary element of a properly functioning capital market. While the primary motivation for many of us in seeking corporate disclosure is to address social and environmental inequities, many of us are also fiduciaries, using this information to make buy and sell decisions, based on the belief that these issues present legitimate risks to business, and to shareholder value. These are therefore financial risks. As companies and investors begin to see these issues as financial risks, they will act to address them. We would therefore caution against the use of the term “extra financial,” which implies that these issues are unrelated to financial performance.

3. While any earnest attempt at providing more information should be welcomed, some of these reports are more helpful than others. The lack of a universal format makes it difficult to assess relative performance, and can result in overwhelming amounts of data – or at worst in public relations fluff masquerading as data.

Comment:

This is true, but as noted below, in the human rights area the most significant challenge is the paucity of data, not the overabundance of data.

5. Good reports include a mix of quantitative and qualitative assessment, third party perspectives, and challenges and dilemmas as well as successes. SustainAbility evaluates reports in four categories: descriptions of business activity, sustainability issues, and commitments; management processes to carry out the company’s commitments; descriptions of performance; and accessibility and assurance. The Global Report Initiative’s reporting principles are transparency, inclusiveness, auditability, completeness, relevance, sustainability context, accuracy, neutrality, comparability, clarity, and timeliness.

Comment:

We strongly recommend broad use of the GRI’s “reporting principles” as a benchmark for understanding what constitutes effective and responsible reporting.

6. SustainAbility has identified a few current trends in reporting: standardisation and consolidation of language, concepts, and formats; greater integration of nonfinancial and financial reporting; and governments establishing legal requirements for disclosure of non-financial information. The point of integration is critical, as reporting should endeavour to explain the impact of business’s core activity rather than the smaller effects of discretionary social investment.

Comment:

This is a key point. Many corporate sustainability reports focus on philanthropy, or on isolated projects. Corporate social responsibility reports, like corporate financial statements, must tell the whole story – not simply highlight the successes. The impact of the company’s core activities should be the centerpiece of any report.

Issues for further discussion

12. Pension funds, socially responsible investment funds, and some mainstream financial analysts are seeking more and better information on non-financial performance. They generally undertake that research themselves, developing their own methods and metrics. The recently-launched Principles for Responsible Investment, an outgrowth of the Global Compact’s “Who Cares Wins” initiative, is one example of a cooperative effort by the financial community to advance the field of non-financial reporting. If the reporting industry were to achieve a higher level of consistency and credibility, could corporate self-reporting meet analysts’ needs?

Comment:

[It is not clear what is meant by the “reporting industry.” Our answer assumes the question is referring to “corporate reporting.”] Prudent investors will always want to rely on a multiplicity of sources, where available. These include the press, non-governmental organizations and affected communities, information gleaned through direct engagement with corporate management, academic studies, and others. Social investors currently rely on a wide variety of sources of information because there is always more than one side to a story, and also because such triangulation adds credibility to the data-gathering process.

That being said, a higher level of consistency and credibility in corporate reports would be a significant, and welcome, improvement. In many areas, the corporation will always be the best, and occasionally, the only, source of comprehensive information on a given topic. For example, an NGO or affected community may be able to credibly assess a company’s impact in their community, but only the company can effectively communicate how it manages these issues across all of its operations.

In addition, these reports serve as internal management tools, which help to improve corporate performance. The act of gathering data, and measuring and reporting one’s impact, can be a powerful driver of improved performance.

13. Similarly, could reports that are prepared or verified by an entity that has a financial relationship with the subject company meet civil society needs, or is it impossible for such reports to be wholly credible? Could determining some common standards for gathering and reporting community perceptions enhance credibility?

Comment:

Reporting or verification by an entity with a financial relationship to the subject company will always raise some questions about objectivity. Determining some common standards could enhance credibility, but might still fall short of an objectivity “smell test”, depending on who is gathering the information. It is unclear what is meant by “reporting community perceptions.” Common standards and disclosure regarding the method of preparing a report would lend greater credibility to corporate reporting whether by the company itself, or by a third party.

Professional auditors and other groups used for report preparation and verification undertake certain financial and legal risks when they put their name on a report, and they should be compensated appropriately for undertaking these risks.

We believe that it is critical for community-based capacity building, as well as credibility, for corporations to look to include independent community-based groups wherever possible. If such groups were used for report assessment, we would recommend that they be paid for their efforts, particularly in light of the legal and reputational risks they may incur by serving in the role of auditor.

Companies need to consider the expertise of the entity they are using to audit their reports. These groups should have expertise in social accountability issues, and legitimacy with the company’s stakeholders. If they perform their functions according to generally accepted principles (along the lines of GAAP, used in financial auditing), the potential conflict of interest created by their fee should be mitigated.

14. Perhaps the greatest pitfall of employing quantitative indicators is that companies too often measure easily quantifiable rather than the qualitative dimensions of their activities. Moreover, it is difficult to link changes in living conditions directly to business activity because of the many other variables at play, ranging from governance to national economic performance and natural disasters. The Collaborative for Development Action's (CDA) Issue Paper, "Defining and Measuring Successful Relations with Communities: Developing Indicators of Impact", asserts that indicators should point to trends and not be managed as the ultimate goals. For example, an indicator of "no negative press" could lead to attempts to influence journalists rather than to operate in such a way that no bad stories are warranted. CDA suggests that companies determine indicators in collaboration with affected communities to better articulate success and understand expectations and perceptions. How can indicators be locally meaningful and yet globally comparable?

Comment:

While it is true that "it is difficult to link changes in living conditions directly to business activity because of the many other variables at play" it is important not to confuse corporate actions, and reporting metrics, with desired societal outcomes. The key in corporate reporting is to understand what the company is doing, and to settle on appropriate indicators of progress. Although these are certainly related to broader desired outcomes, the availability of a transparent corporate report should not hinge on the resolution of these issues. The company is not responsible for raising the standard of living in a country. It is responsible for its actions, and its impact, positive or negative, on that country's efforts to improve living conditions for its citizens. We should therefore not allow the complexities of economic development and other societal factors to impede the progress of corporate reporting.

Some of the leaders in footwear and apparel (and a very small number of leaders in retail) have increased their collaboration with local stakeholders as part of a new trend in supporting local capacity building. This could provide an entrée into the type of process suggested by CDA. Although the local context will obviously influence the type of indicators settled upon, there are certain core indicators across industries or perhaps within countries that will likely emerge from such a process, and which could be "globally comparable". If channeled through multi-stakeholder initiatives that have attracted leading firms, the trajectory from local to global could be strengthened. However, we can also look toward the uptake of the GRI for possibilities in this area.

A reporting regime where the company selects the indicators will never fully satisfy the needs of corporate stakeholders, and certainly not of investors. Investors need comparable data with which to compare peer companies to each other, and to understand the risks facing individual companies and industries. The selection of indicators is therefore critical. When companies are left to select their own indicators of performance, they will often choose those easiest to measure, or those for which data is already available. These indicators may not serve investors or other stakeholders well, however. Indicators of performance should, ideally, be consistent across companies and industries, and developed as part of a multi-stakeholder process – either by government, or in certain cases, by companies in collaboration with key stakeholders. The GRI is one such example. Gap Inc.'s public reporting on its global labor standards compliance is another.

It is also important to keep in mind that many aspects of performance cannot be quantified. Companies can provide narrative disclosure to address these areas.

15. Similarly, many companies now report on the extent of their stakeholder engagement, such as the number of consultations they sponsor, but rarely share how they incorporate or respond to the feedback they receive. How can companies better report on this activity?

Comment:

Companies can do this by devoting a section of reporting to stakeholder engagement year on year, so that a "watch this space" mechanism develops; by setting goals publicly (in a CSR report, for example) for how stakeholder feedback will be used; or by appointing an ombudsman to coordinate and report on stakeholder engagement and follow-up year on year.

16. The stock exchanges of France, Denmark, Holland, and South Africa require reporting on non-financial dimensions, although with varying degrees of enforcement. The Global Compact counts Bovespa, the Jakarta Stock Exchange, the Istanbul Stock Exchange, and Euronext among its members, and is exploring collaborative activities with other exchanges. The UK recently abandoned plans to require its largest listed companies to produce Operating and Financial Reviews for shareholders that would have included environmental and social issues. Some urge that such requirements are necessary to engage laggard companies and raise the lowest common denominator, while others believe that reporting is more likely to achieve excellence if it is competitive rather than defensive. What other countries should consider requiring non-financial reporting, and how can such regulation induce quality reporting while not having the adverse effect of discouraging companies from listing?

Comment:

As noted in our cover letter, we strongly encourage stock exchanges to include social and environmental disclosure requirements in their listing standards. We believe that some form of mandatory reporting is essential in order to establish a baseline that includes both “good” and “bad” actors and to “level the playing field” for all listed companies to eliminate the current disincentives to reporting. We would encourage such disclosure in the world’s major markets, including the U.S., Switzerland, Japan, Mexico, Belgium (among others). To avoid the adverse effect of discouraging companies from listing: one idea might be to set a ratcheting-up scale, where reporting requirements are less extensive for entry but increase over time. Reporting requirements for smaller companies with less exposure to these issues could be significantly less onerous.

17. Why don’t more companies report voluntarily? Apart from legal requirements for listing as mentioned above, what other incentives or requirements would be effective?

Comment:

Companies fail to report their social and environmental performance for a variety of reasons, including perceived litigation and regulatory risks and a general lack of competitive pressure from peer firms. A company with a poor human rights record currently has little incentive to prepare a transparent report. Similarly, many companies that have not faced controversies with civil society over their performance believe that disclosure will merely tempt potential critics. There is a strong bias, at least in the U.S., towards minimal compliance with reporting requirements – if a data point is not required to be disclosed, most companies will not disclose unless they perceive a market advantage in disclosure.

Many see these issues as superfluous to their business, at best, and a waste of resources at worst; and because the punishments for non-reporting are, in their view, either non-existent, not measurable, or not material.

Other incentives to reporting include: shareholder pressure; civil society pressure; studies that show increasing evidence of a business case for CSR reporting (and perhaps increasing evidence of a business case against not reporting); and increased positive attention to good reports.

None of these incentives, however, are likely to address the significant imbalance between those companies that report, and those that choose not to. Some form of mandatory disclosure is therefore needed.

18. SustainAbility’s *Reporting on Human Rights 2005* found that “there is relatively little reporting on human rights” specifically. The SRSG’s survey of the Fortune Global 500 firms similarly found that by a ratio of more than 2:1 companies report on human rights as part of an overall corporate code or set of principles rather than through of a free-standing human rights policy. Must companies report within a specific human rights framework, or can the critical issues be adequately addressed within other frameworks of non-financial standards and performance (e.g. health, safety and environment, labour, sustainability, etc.)?

Comment:

Some critical human rights issues can be covered in other frameworks, such as health and safety. But for other issues – particularly for companies with high exposure, for example, to population displacement, use of security forces, or supply chain labor violations, reporting within a specific human rights framework remains preferable. We believe it is also important that companies endeavor to understand the international human rights instruments, and their obligations thereunder. A specific human rights reporting framework will encourage companies to go through this exercise and begin to understand issues such as labor rights, health and safety, privacy, etc., as human rights.