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# Exposure draft of *GRI 303: Water and Effluents*

## *Public comments received via email*

<b>Date</b>	5 March 2018
<b>Description</b>	<p>The Global Sustainability Standards Board (GSSB), GRI's independent standard-setting body, started a project to review the <i>GRI 303: Water 2016</i> Standard.</p> <p>Following the GSSB's Due Process Protocol, an <a href="#">exposure draft</a> of the revised Standard, <i>GRI 303: Water and Effluents</i>, was exposed for public comment from 10 August to 9 October 2017.</p> <p>This document includes the full set of public comments received via email during the first public comment period.</p> <p>The table on the next page lists all respondents that provided feedback via email, and the full submissions are included, in alphabetical order by the respondent's last name, in this file.</p> <p>Please note that some respondents listed here also provided feedback on the exposure draft via the GRI Standards Consultation Platform; these comments are included in a separate Excel file, which can be downloaded on the <a href="#">GRI Standards website</a>.</p> <p>The GSSB will publish a separate 'Basis for Conclusions' document after the approval of <i>GRI 303: Water and Effluents</i>, summarizing the main themes from the public comment and how they have been addressed in the final Standard.</p>

# Overview of respondents that submitted comments by email

The table below lists all respondents that submitted comments by email directly to the GSSB or GRI Standards Division during the public comment period on the exposure draft of *GRI 303: Water and Effluents* (from 10 August to 9 October 2017).

Number	First name	Last name	Representation	Organization	Country	Region	Constituency	Page
1	Marc	Despiegelaere	Organizational	Protos	Belgium	Europe	Civil Society Organization	<a href="#">Page 3</a>
2	Erdem	Kolcuoglu	Personal		Turkey	Asia	Mediating Institution	<a href="#">Page 5</a>
3	Artemis	Kostareli	Organizational	IPIECA	United Kingdom	Europe	Mediating Institution	<a href="#">Page 9</a>
4	Paulo	Luz	Personal		Portugal	Europe	Other	<a href="#">Page 12</a>
5	Dr. Prachi Ugle	Pimpalkhute	Personal		India	Asia	Other	<a href="#">Page 27</a>
6	Hongqiang	Ren	Personal					<a href="#">Page 33</a>
7	William	Sarni	Personal		United States	Northern America	Business Enterprise	<a href="#">Page 34</a>
8	Hayley	Zipp	Organizational	ICMM	United Kingdom	Europe	Mediating Institution	<a href="#">Page 35</a>

# *1. Comments from Marc Despiegelaere (on behalf of Protos)*

Here some high level comments on behalf of Protos.

First of all, we see the GRI 303 draft standard, by integrating water withdrawal and effluent discharge in 1 standard, as a very good step forward!

Our main concern is that the impact of remaining substances in effluent when discharged in the environment is not assessed enough.

What is important, is not only the quality of the effluent, but the remaining substances discharge in concentration and in total load (expressed in kg) which could harm the environment.

In that sense, table 2 line 280 is unclear to us.

Knowing levels of treatment is nice in disclosure 303-2: more important is being informed on levels of substances remaining in the treated effluent.

On 303-2 d. the substances of concern, it would be good have besides I, ii and iii, to have (iv) information on the discharge consent ( permits or permission of public authorities) and (v) the amount of levy's paid on discharged effluent to public authorities.

Not clear to us is the description of primary, secondary and tertiary treatment in line 318-322. Are heavy metals only to be removed in a tertiary treatment?

Second main concern is on disclosure 303-4 line 366: ... impacts on the supply chain or due to its products and services, ... Pls also underscore its products and services...

And in b. ... with significant suppliers or customers; also underscore customers.

For Protos, the eventual consequences on water bodies and the environment at the end of the value chain (customers) are more important than at the beginning of the value chain (suppliers).

If a company is bringing a potential harmful product for water bodies on the market, this company must clearly instruct its customers how to use the product to minimize the impact to water bodies and the environment.

So, guidance under line 384-386 is for us more important than 387-392 on suppliers.

Proposed changes in the draft text.

Line 103-104, .... wellbeing, and access to drinking water and sanitation is recognized by the UN a human right (not fresh water).

114 ... and discharge of polluted water can affect...

125 , such as a basin's and aquifers' ability... (look also under the ground).

135, ... including social and environmental impacts

137 ... of all water users and nature in an area;

177 ...has set for the quality of discharges to minimize the impact on the environment, and how...

182... surface runoff: not clear to us

Hope this helps the Working Group working on the Standard

Kind regards,

**Marc Despiegelaere**

*External Relations & Communication*



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Protos fully supports the Sustainable Development Goals!

## 2. Comments from Erdem Kolcuoglu (personal feedback)

### Feedback on GRI 303 Revisions

- Inclusion of “water discharge” indicator (GRI 303-2) in the Standard is a positive change. It avoids confusions and increase completeness of the Standard and facilitate development of issue specific performance reporting through a single Standard.
- Focus on water-stress areas is a positive change. This revision not only develops the completeness of the Standard but also increases alignment with various other initiatives.
- Inclusion of GRI 303-4 on water impacts in the supply chain is a development.
- Indicator sets are still useful for large scale manufacturing industries but became very complex (especially 303-1) to be adopted by SMEs or service sectors.
- GRI Standards’ brand promise is to be the Global Standard on Non-Financial Reporting either in sustainability reporting or any issue specific format. Thus, an average reporter should find a set of indicators which are useful for a complete picture of water performance. However, new indicators sets are highly focused on demonstrating “the impact made” but lacks “the impact mitigated”.

### Feedback on GRI 303-1

- Inclusion of water-stress area cluster in water withdrawal indicator is highly useful for emphasizing water scarcity issues, as well as for alignment with other initiatives. However, definition of water-stress area may cause data differences or gaps between different reporters which has a negative impact on benchmarking ability. For instance, in line 247-248, standard draft refers to “publicly available and credible methodologies” one of which is definitions made by States which may be different than most internationally known frameworks.
- The Standard document refers to (and by referring, publicly endorses) various methodologies in lines 284-286 for water-stress area mapping, which are useful. However, these are external resources; so their accuracy or even existence neither under GRI’s control nor guaranteed by their source. For example, WBCSD [Global Water Tool](#) currently seems offline. A standard document must refer more stable external resources if necessary.
- GRI 303-1 becomes a highly complex indicator to report fully for most organizations which may either lead them to omit most of the indicator content or (for Core option reporters) to ignore entirely.
- It is highly recommended to create a separate indicator for “water consumption” for various reasons:
- 1- Standardization Technique:

- Calculation of “Water Consumption” requires 2 data: Total water withdrawal (303-1) – “Total Water Discharge” (303-2). This means, a reporter who wants to report 303-1 fully is forced to disclose 303-2 as well. This is an indicator structure error. It can be solved by setting water consumption as a separate indicator preferably as 303-3.
- 2- Not Applicable For Various Industries, Process Structures or Organization Sizes:
  - “Water Consumption” indicator is useful for most organizations to calculate their impact on water resources and it is also good for alignment with various other initiatives. But it is not a meaningful for various types of organizations.
  - Example: A small IT company withdrawing water only from municipal system for household use and discharges all to sewage system. Their water consumption will always be 0.
- 3- Conflicting Definitions:
  - There are two definitions of “Water Consumption” used in the Standard document:
  - A- In page 12, line 273: “Water consumption can typically be calculated as total water withdrawals minus total water discharges.”
  - B- In page 20, line 426-429: “the use of water that is not returned to its original source”
  - These definitions are not necessarily referring to the same thing.
  - Almost all situations companies discharge their waste water to a receiving environment other than their original water source. So according to the definition B, in these cases, water withdrawal is equal to water consumption. Hence, definitions B is in conflict with Definition A.
  - Example 1: An oil refinery withdraws water from a lake which is also the water source of a local community nearby. They discharge waste water to the Sea. According to the definition B, Water consumption = Water withdrawal
  - Example 2: Company A withdraws 1000 units of water from a lake, does not lose a significant amount in the process and discharges 500 units of the waste water back to the lake itself and uses 480 units of treated waste water in watering their terrain the lake shore which eventually feeds the lake.
  - According to the Definition A, water consumption of Company A is 500 units while, in fact, Company A is literally giving back 980 units of to the original source, only lose 20 units.
  - Example 3: Case of rainwater harvested to be used for irrigation in dry days with no discharge process. What will be the consumption value?
  - Briefly, water consumption indicator can be useful in various cases but not all, thus it has to be listed as a separate indicator so that organizations which find it useful can use, otherwise ignore.

- Note: Although it is referred in various other initiatives, the term “water consumption” does not really defines what it is needed to be. Because any water withdrawn is somehow used, thus consumed. May be more definitive syntax can be more useful such as “water lost in the process”
- Recycle rate calculation refers to total recycled water/water withdrawal in percent. However this rate does not produce a meaningful performance unless we know recycling cycles.
- Example:
- **Company A:**
  - Water withdrawal: 1.000 m3
  - Reuse cycle: 4
  - Amount recycled per cycle: 490 m3
- **Company B:**
  - Water withdrawal: 1.000 m3
  - Reuse cycle: 2
  - Amount recycled per cycle: 980 m3
- In this case, both companies have a recycle rate of %196. However we understand that Company B’s recycling process is twice more efficient. In that case recycling rate does not provide much benchmarking opportunity but a fact.
- A question may arise, as “Company B reuses for less cycles, its not logical; if they were that efficient, they would reuse for more cycles.
- Answer would be “not necessarily”. They do not reuse more, simply because their production value requires only that amount of water in a given time period. Further treatment of waste water would generate more energy use, emissions, chemical use and air emissions not to mention financial cost. Thus, organizations would not adopt it as a performance metric; or metric wouldn’t push further recycling efforts.
- Recycling rate calculated per water withdrawn, can be useful for various purposes but in that case it is better to ask average recycling cycle as well.
- However “water demand met through recycling of withdrawn water” would be a better disclosure which would push companies for further increase in performance of recycled water.
- For this metric, we use total recycled water amount and total water demand (total water withdrawal+ total recycled water amount)

$$\text{Rate of Water Demand Met by Recycled Water} = \frac{\text{Total Water Recycled}}{\text{Total Water Withdrawal} + \text{Total Water Recycled}} \times 100$$

- That would be a metric demonstrating how much impact mitigated. It is relatively more independent from production value and recycling efficiency. Companies may adopt it for performance development KPI.

### Feedback on GRI 303-3

- Inclusion of indicator regarding spills and leaks is a positive change.

- The usage of the term “significant” may cause confusions especially as “significant spill and leak”. In some jurisdictions and/or for some industries the definition of “significant spill” is made by regulations. These regulations define spill of certain amount of certain substances as significant. And in some cases these are really low values, such as half barrel of oil or fuel etc. A significant spill requires a certain regulated action etc. If we take these examples spill disclosure of a multinational oil company would be in a stand alone report size
- However intendment of the indicator wording clearly shows us that, it only requires information regarding spills and leaks which has an impact on environment, communities, etc. So, in fact, it is the significance of impact we are looking for but not only the spill itself. If the wording of the indicator (*Volume of each significant spill or leak, the location, and the substance.*) can be changed to (*Spills or leaks with significant impact by volume, location and substance*), it would refer to a clearer data.
- In new indicator set, we find various indicators to disclose “the impact made” but to draw a complete picture of water performance of an organization we also need a set of indicators focusing on “the impact mitigated”.
- For instance relative KPIs such as water intensity (water withdrawal by unit produced, revenue generated or by various other denominators) and waste water discharge intensity are frequently used by organizations together with absolute KPIs such as water withdrawal and total water discharge. Furthermore, most organizations set their water target by intensity figures which give a clearer and meaningful information to most readers not to mention investor.



### 3. Comments from Artemis Kostareli (on behalf of IPIECA)

## IPIECA

### Revised GRI Standard 303: Water and Effluents and GRI 403: Occupational Health and Safety

#### IPIECA COMMENTS FORM

This is the IPIECA comments form for:

- GRI 303 (including the responses to the questionnaires as well as specific comments to GRI 303 PDF)

#### GRI 303 – SPECIFIC COMMENTS TO PDF

LINE NUMBER	COMMENT
244, items a. i. and b. i.	Suggest to include a reference to clarify and agree what is considered a wetland.
244, items a. iii and b. iii.	Many companies do not report sea water/brackish water withdrawal, as the focus is on freshwater resources. Suggest to remove as it does not add to overall risks of freshwater use and consumption.
271	It is more useful to report Freshwater OTCW separately and make a distinction between freshwater OTCW returned unchanged to a freshwater body (not adding to freshwater consumption) and freshwater OTCW discharged to a non-freshwater body (adding to freshwater consumption).
272	Suggestion to clarify what is meant by including produced water in total water consumption. Produced water is typically not considered freshwater withdrawn or consumed. When treated and used for beneficial use, produced water can add positively to the freshwater balance of an activity.
273	For water discharges: suggest to distinguish between discharges to freshwater environment (not considered consumption) and discharges to non-freshwater environment (considered consumption).

279	I like the reference to Table I, Water Withdrawals. Companies may find this more intuitive to report its most “material” water impacts emulating this table rather than a line- by-line accounting and description prescribed under 303-I, Disclosures.
299, item a.	More important than reporting the actual destination is to ensure that the discharge is compatible to the receiving water body. Freshwater bodies are in many cases more sensitive to discharges because of its use by society. It may be more pragmatic to report discharges to freshwater and non-freshwater bodies.
299, item a. i.	This will now require a little more time because there are some new features in it from usual, but which are already partially covered by our Local Water Tool program and that can be narrowed down by the selection filter of what is constitutes a “Significant or not (‘water source)’s.
299, item b. ii.	Water quality is very hard to report, as this can vary greatly. Suggestion for companies to select quality criteria when relevant based on the nature of the industrial activity.
299, item d.	On item i., it is not practical to request discharge limits as these vary from operation to operation depending on regulatory requirements. Item ii., limits are typically set by regulators and in their absence, international standards are typically used (IFC standards). Item iii., most companies strive to comply with local regulations. However, it is impractical to list hundreds of assets with different discharge limits in a reporting framework such as this. It doesn't help to improve the companies' performance and requires significant resources.
303	Not clear what this situation this is supposed to cover. Does this represent water discharged by a company and used by third parties? Or does this represent water discharges by third parties in the supply chain?
317, 325, 340	Suggestion to clarify if this is required or not, since this is part of the Guidance section.
325-336	Our discharge quality is mandated by regulations and yet is far from being of drinking water standard. It doesn't seem to be a good criterion to use. The point is whether the discharge is compatible to the receiving water body. Most surface water is not of a quality good for drinking, it will always necessitate some form of treatment. So it does not seem practical to classify discharges based on drinking water criteria. Suggestion for companies to select quality criteria when relevant based on the nature of the industrial activity.
339-341	Most companies strive to comply with local or international regulations. While non-compliances can occur, companies strive to rectify these immediately which renders reporting ineffectual since most of these will be in the process of being rectified. The reporting requirement implies that non-compliances are ignored. It hard to see how companies that ignore non-compliance will be reporting these publicly.
426	This definition is different than the definition in IPIECA's sustainability reporting guidance, which is more accurate and says: "difference between fresh water withdrawn and fresh water returned". Suggestion: provide a reference aligned with IPIECA's definition.

## GRI 303 – QUESTIONNAIRE RESPONSES

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- Question 1: No, The main impacts should reflect on freshwater withdrawals. The Standard should reflect on water consumption and effluents.
- Question 2: No, The General Disclosures are overly comprehensive in scope and detail for reporting both water-stressed and total operating areas of a company, including the value chain (especially for big companies that have operations world around the globe) . IPIECA is challenged to think of any company reporting at this level of detail under any reporting framework.
- Question 3: Yes, Please see comments in PDF. 317, 325, 340 Suggestion to clarify if this is required or not, since this is part of the Guidance section.
- Question 4: No, While the Standard contains essential information on water withdrawals and effluents, the broadening of the water withdrawals reporting to include e.g seawater may obscure the results of the reporting and provide the wrong information in decision making.
- Question 5: Yes, There has been positive feedback on the Guidance - however the link between SDGs and freshwater withdrawal is missing in the guidance. Despite the reference to UN SDG Goal 6, under the Objectives for the Review, there is an absence of reference and context for applying the SDGs in any of the Guidance sections.
- Question 6: No comment.
- Question 7: Yes, Many companies do not report sea water/brackish water withdrawal, as the focus is on freshwater resources. Therefore it is not critical to report that as it does not add to overall risks of freshwater use and consumption. Furthermore, it is not practical to request discharge limits as these vary from operation to operation depending on regulatory requirements. The limits are typically set by regulators and in their absence, international standards are typically used (IFC standards). Most companies strive to comply with local regulations. However, it is impractical to list hundreds of assets with different discharge limits in a reporting framework such as this. It doesn't help to improve the companies' performance and requires significant resources.
- Question 8: Yes, this is clear.
- Question 9: No, It is more useful to report Freshwater OTCW separately and make a distinction between freshwater OTCW returned unchanged to a freshwater body (not adding to freshwater consumption) and freshwater OTCW discharged to a non-freshwater body (adding to freshwater consumption). As said earlier, many companies do not report sea water/brackish water withdrawal, as the focus is on freshwater resources.
- Question 10: Level of quality. We think that it is better to report by level of quality i.e report the quantity of hydrocarbons and chemical discharges to water. However, water quality is very hard to report, as this can vary greatly. Suggestion for companies to select quality criteria when relevant based on the nature of the industrial activity. Furthermore, we do not agree with the categorisation at the guidance - see respective comment.
- Question 11: No, There are many (millions) substances of concern and each jurisdiction has different priorities and standards. We don't think that a list of regulations in the guidance will be of value and practical. This is publicly available information at very detailed level.
- Question 12: Yes, Companies automatically include supply chain impacts if material (and where relevant) in areas of water stress e.g biofuels. The supply chain (especially for oil and gas) is very extensive and any disclosure would be very generic and probably of little value.

## 4. Comments from Paulo Luz (personal feedback)

### Review of GRI 303: Water

The GSSB is overseeing a project to review and update the content of [GRI 303: Water](#) in 2017.

The project's objective is to review and update the content of [GRI 303: Water](#) to ensure it is in line with internationally-agreed best practice and reflects recent developments in water management and reporting. The scope of work includes updating, expanding or deleting existing content, where appropriate.

The scope of this review also includes the effluents-related disclosures from [GRI 306: Effluents and Waste](#), and content on effluents has been incorporated into the draft [GRI 303: Water and Effluents Standard](#). The project follows the [GSSB Due Process Protocol](#), the implementation of which is overseen by the [Due Process Oversight Committee](#).

A 60-day public comment period is [now open](#) to review proposed changes to [GRI 303: Water](#). [Find out more about the proposed updates and the public consultation](#), or provide your feedback on the [GRI Standards consultation platform](#) before **9 October 2017**.

Further information about the project can be found in the [Review of GRI 303: Water project proposal](#). Please keep your eye on this page, or sign up below, to stay informed about the updates to [GRI 303: Water](#). Further questions can be emailed to [water@globalreporting.org](mailto:water@globalreporting.org).

A 60-day public comment period is [now open](#) to review proposed changes to [GRI 303: Water](#) and [GRI 403: Occupational Health and Safety](#).

These [GRI Standards](#) – part of [the first global standards for sustainability reporting](#) – have been updated through a formal due process, overseen by [the GSSB](#), GRI's independent standard-setting body.

You can find out more about the [water](#) and [occupational health and safety](#) projects and proposed changes below, or by registering for [live](#) and [recorded webinars](#). Then, review and comment on the drafts through [the GRI Standards public consultation platform](#). Your input will further improve the common global language for corporate reporting on these topics - **so have your say, today!**

### Explanatory memorandum

This explanatory memorandum sets out the objectives of the review of [GRI 303: Water and Effluents](#) (hereafter 'GRI 303'), the significant proposals and changes contained within the exposure draft of [GRI 303](#) and a summary of the Global Sustainability Standards Board (GSSB)'s involvement and views on the development of this draft.

#### *Objectives for the review of GRI 303*

The primary objective was to review the content of [GRI 303](#) in order to represent internationally-agreed best practice and to align with recent developments in water management and reporting practice. Key references for revising the content included international authoritative instruments, such as the UN Resolution A/RES/64/292 (The human right to water and sanitation) as well as Goal 6 of the Sustainable Development Goals, which emphasizes access to clean water and sanitation. In addition, the project aimed to better align the Standard with key concepts in other reporting frameworks and standards such as CDP, SASB, the Alliance for Water Stewardship Standard, and the Corporate Water Disclosure Guidelines from the CEO Water Mandate. A multi-stakeholder Project Working Group (PWG) was formed to help contribute to the revision of [GRI 303](#), as outlined in the GSSB's Due Process Protocol. For more information, consult the project proposal and terms of reference.

## Significant proposals and changes in GRI 303

The content of GRI 303 has been revised in line with the project objectives set out above. Notable changes in this draft Standard are summarized below:

- **Effluents/ discharge content** is now incorporated into **GRI 303**, to provide a full picture of water impacts, from withdrawal to consumption to discharge. The Standard has also therefore been retitled **GRI 303: Water and Effluents**. Previously, disclosures on effluents were part of **GRI 306: Effluents and Waste**. See lines 298-346 and 347-363.
- **Water consumption** is now required, along with withdrawals, as an important indicator to understand an organization's overall water impacts. Guidance is provided on how to calculate water consumption and a definition will be included in the GRI Standards Glossary. See lines 273 and 425-429.
- **There is greater emphasis on water-stressed areas**, to focus on impacts in the most sensitive locations. Water withdrawals by source and total water consumption is now required for water-stressed areas and all areas. See line 244.
- **New specific management approach content related to water/ effluents has been introduced**. These additional requirements are intended to complement the disclosures in **GRI 103: Management Approach**. They focus on specific elements of an effective management approach for water and effluents, including how water is managed at a local level and as a shared resource. See lines 170-183.
- **More detail is now required on discharges**, including reporting discharges by level of treatment or quality, substances of concern, and whether minimum treatment levels have been set. See lines 177-178 and 299.
- **A new specific disclosure on water impacts in the supply chain and related to products and services** has been added, to give additional opportunity for organizations to report about significant water impacts elsewhere in the value chain. This disclosure is intended to complement the existing requirements in **GRI 103: Management Approach** around identifying **where** water impacts occur and how these impacts are managed. See lines 364-395.
- **Reporting on water recycled and reused** is now recommended, but not required. Although recycling and re-use can be an important part of managing water, the total impacts are also now covered by reporting on water consumption. See lines 260-261.
- **Less detail is now required on the number of type of sources for withdrawals**, although water withdrawals are still required to be reported by source. Nearly all content from Disclosure 303-2 (Water sources significantly affected by withdrawal of water) in the current Standard has been removed. See line 299.
- **More extensive guidance has been added throughout**, including sample tables for reporting data. See lines 279 and 280.

**Comentário [P1]:**  
And "when" (depending on the season...)?

## GSSB's involvement and views on the development of this draft

The GSSB appointed one of its members as a sponsor for the review of GRI 303. The GSSB sponsor observed the PWG process and attended most of their meetings.

A rough draft of GRI 303 was discussed by the GSSB on 29 June 2017, who expressed overall support for the changes in the draft. The draft was later revised based on PWG and GSSB feedback.

The GSSB confirmed its support for the revisions to GRI 303 when it voted to approve the draft for public exposure at its meeting on 19 July 2017.

Meeting minutes and recording of the meetings can be accessed on the GSSB website [here](#).

## About this Standard

Responsibility	This Standard is issued by the Global Sustainability Standards Board (GSSB). Any feedback on the GRI Standards can be submitted to <a href="mailto:standards@globalreporting.org">standards@globalreporting.org</a> for the consideration of the GSSB.
Scope	<i>GRI 303: Water and Effluents</i> sets out reporting requirements on the topic of water and effluents. This Standard can be used by an organization of any size, type, sector or geographic location that wants to report on its impacts related to these topics.
Normative references	This Standard is to be used together with the most recent versions of the following documents. <a href="#">GRI 101: Foundation</a> <a href="#">GRI 103: Management Approach</a> <a href="#">GRI Standards Glossary</a> In the text of this Standard, terms defined in the Glossary are underlined.
Effective date	This Standard is effective for reports or other materials published on or after [to be determined]. Earlier adoption is encouraged.

## Introduction

### A. Overview

This Standard is part of the set of GRI 15 Sustainability Reporting Standards (GRI 16 Standards). These Standards are designed to be used by organizations to report about their impacts on the economy, the environment, and society. The GRI Standards are structured as a set of interrelated, modular standards. The full set can be downloaded at [www.globalreporting.org/standards/](http://www.globalreporting.org/standards/).

There are three universal Standards that apply to every organization preparing a sustainability report:

[GRI 101: Foundation](#) [GRI 102: General Disclosures](#) [GRI 103: Management Approach](#)

[GRI 101: Foundation](#) is the starting point for using the GRI standards. It has essential information on how to use and reference the Standards.

### B. Recommendations.

These are cases where a particular course of action is encouraged, but not required. In the text, the word 'should' indicates a recommendation.

### C. Guidance.

These sections include background information, explanations and examples to help organizations better understand the requirements. An organization is required to comply with all applicable requirements in order to claim that its report has been prepared in accordance with the GRI Standards.

See [GRI 101: Foundation](#) for more information.

### D. Background context

In the context of the GRI Standards, the environmental dimension of sustainability concerns an organization's impacts on living and non-living natural systems, including land, air, water and ecosystems.

*GRI 303* addresses the topic of water and effluents. Access to fresh water is essential for human life and wellbeing, and is recognized by the United Nations (UN) as a human right. The set of Sustainable Development Goals, agreed by the UN and international community, includes key targets related to water stewardship under Goal 6 (Ensure access to water and sanitation for all). These targets cover, for example, achieving universal access to safe and affordable drinking water, improving water quality, and addressing water scarcity issues. The withdrawal and discharge of water can affect the function of ecosystems in numerous ways. Such changes have wider impacts on the quality of life in an area, including economic and social consequences for local communities or indigenous peoples. The amount of water used by an organization and the quality of its discharges are important factors in understanding an organization's overall water impacts. Impacts on the local water environment depend on a number of contextual factors, such as a basin's ability to



## COMMENTS ON THE DOCUMENT:

### GRI 303: Water and Effluents

This Standard includes disclosures on the management approach and topic-specific disclosures. These are set out in the Standard as follows:

- Management approach disclosures (this section references *GRI 103*)
- Disclosure 303-1 Water withdrawal and consumption
- Disclosure 303-2 Water discharge
- Disclosure 303-3 Spills and leaks
- Disclosure 303-4 Water impacts in the supply chain and related to products and services

#### 1. Management approach disclosures

Management approach disclosures are a narrative explanation of how an organization manages a material topic, the associated impacts, and stakeholders' reasonable expectations and interests. Any organization that claims its report has been prepared in accordance with the GRI Standards is required to report on its management approach for every material topic, as well as reporting topic-specific disclosures for those topics. Therefore, this topic-specific Standard is designed to be used together with *GRI 103: Management Approach* in order to provide full disclosure of the organization's impacts. *GRI 103* specifies how to report on the management approach and what information to provide.

##### Reporting requirements

1.1 The reporting organization shall report its management approach for water and effluents using *GRI 103: Management Approach*.

##### 1.2 The reporting organization shall:

- 1.2.1 describe its main uses of water, including how and where water is used and discharged;
- 1.2.2 describe its approach for identifying impacts, including the scope of assessments, their timeframe, and any tools or methodologies used;
- 1.2.3 describe how it works with other stakeholders to manage water as a shared resource;
- 1.2.4 describe any minimum standard it has set for the quality of discharges, and how the minimum standard was established;
- 1.2.5 explain the process for setting any goals and targets that are part of its management approach, including how they relate to public policy and the local context of each water-stressed area;
- 1.2.6 in cases where there are significant impacts from surface runoff, including agricultural runoff, describe these impacts and how they are managed.

##### 1.3 The reporting organization should:

- 1.3.1 provide an overview of how water use and effluent discharge is distributed across its value chain;
- 1.3.2 identify the specific locations or river basins where it has significant impacts.

##### Reporting recommendations

###### Guidance

###### Guidance for clause 1.2.1

The description of where water is used and discharged can include the geographic location and/or the process stages of water use. An overview of how water use and effluent discharge is distributed across the value chain is covered in clause

###### Guidance for clause 1.2.2

In assessing impacts, it is important to consider the reporting organization's future impacts on water quality and availability, as these factors can change over time. Tools and methodologies for identifying impacts can include lifecycle assessments, environmental impact assessments, water footprints, scenario analysis, and stakeholder engagement, among others.

Comentário [P2]: ...and when?

Comentário [P3]: and forestry

Comentário [P4]: Identify the different spatial scales, from site-specific to river basins (some intermediate scales could also be approached...)

Comentário [P5]: The importance of seasonal variability could be stressed in terms of withdrawal-consumption-discharge as well as of scarcity-vulnerability, using metrics/indicators/indices.

#### Guidance for clause 1.2.3

Working with other stakeholders is critical to help the organization manage water as a shared resource and to account for the needs of other users in a river basin or catchment area. Other stakeholders can include: • local communities or action groups; • suppliers; • users of its products or services; • employees and workers; • other water users in its sector or industry; • governments, regulators or non-governmental organizations (NGOs), for example in policy advocacy; • global initiatives, trade associations or partnerships.

Outcomes of working with other stakeholders can include for example, setting collective targets around water use, increased investment in infrastructure, policy advocacy, or capacity building and awareness raising.

#### Guidance for clause 1.2.5

Meaningful targets for managing water-related impacts are those that: • account for the local context where water is withdrawn and discharged; • are informed by sustainable thresholds or the limits of a given basin, based on science; align with effective public sector efforts, such as the targets relating to the United Nations' Sustainable Development Goal on water, or other effective policies advocated by NGOs, global initiatives, national and local government institutions, trade associations and action groups. See reference 4 in the References section.

#### Guidance for clause 1.2.6

Agricultural runoff can carry significant levels of nutrients such as phosphorus and nitrogen, due to animal waste and the fertilizers and pesticides used in farming. These high-nutrient loads can lead to eutrophication and other negative impacts on local water sources. Runoff impacts can be relevant in the organization's own operations and/or in its supply chain.

#### Guidance for clause 1.3.1

The overview of water use and effluent discharge across a value chain can be a simple breakdown, presented in graphic or written form, which shows, for example, the percentage of water consumption related to raw materials versus manufacturing, distribution, etc.

**Background** An effective management approach accounts for the local context of water use, and acknowledges the importance of managing water as a shared resource. An organization can reduce its direct water usage and impacts through efficiency measures, recycling and reuse, and process re-design. It can improve water quality through better treatment of water discharge.

An organization may use efficiency metrics to help measure and manage its water use; for example, tracking the liters of water consumed per unit of production. Where relevant, an organization can report on these metrics as part of their overall management approach. This can include an explanation of how the efficiency metrics were selected and the organization's current and past performance against these metrics.

An organization can also use voluntary standards to help manage its water-related impacts, such as UN 237 Resolution A/RES/64/292 (The human right to water and sanitation), the Alliance for Water Stewardship (AWS) *International Water Stewardship Standard*, and the European Water Partnership (EWP) *European Water Stewardship (EWS) Standard*. See references 1 and 3 in the References section.

**Comentário [P6]:** Problems (also in forestry sector) of erosion, compaction, crust affecting land structural sustainability (due to loss of soil, low infiltration, decrease of soil water content and retention...)

## 2. Topic-specific disclosures

### Disclosure 303-I Water withdrawal and consumption

#### Reporting requirements

The reporting organization shall report the following information:

a. Total water withdrawal from water-stressed areas, with a breakdown by the following sources, if applicable:

- Surface water, including rainwater, water from wetlands, rivers, and lakes;
- Groundwater;
- Seawater/ brackish surface water;
- Third-party water.

b. Total water withdrawal (from all areas), with a breakdown by the following sources, if applicable:

- Surface water, including rainwater, water from wetlands, rivers, and lakes;
- Groundwater;
- Seawater/ brackish surface water;
- Third-party water.

c. Total water consumption from water-stressed areas.

d. Total water consumption (from all areas).

e. Standards, methodologies, and assumptions used.

**Comentário [P7]:** I am not sure if it means "collected" or "harvesting" rainwater (as the point is describing "water withdrawn") so should be included in iii).  
Rainwater corresponds to the sum of evapotranspiration and inflows (to surface water and groundwater) to produce renewable freshwater resources (RFR) – (AQUASTAT/FAO technical notes). Finally, as RFR are part of water withdrawal, rainwater may be considered a source twice?



**Organization shall:**

- 2.1.1 use publicly available and credible methodologies for assessing water-stressed areas;
- 2.1.2 report withdrawal and consumption in megaliters (ML);
- 2.1.3 if the original sources of water supplied by third parties are known, report these sources.

**Reporting recommendations**

- 2.2 When compiling the information specified in Disclosure 303-1, the reporting organization should:
  - 2.2.1 explain how it has calculated water consumption, including any specific factors or assumptions;
  - 2.2.2 break down total water withdrawal by quality;
  - 2.2.3 report water withdrawal by source, and water consumption, at each facility in a water-stressed area;
  - 2.2.4 report the volume of water recycled and reused as a percentage of the total water withdrawal.

**Guidance**

***Guidance for Disclosure 303-1***

Water stress refers to the ability, or lack thereof, to meet the human and ecological demand for water, and considers the availability, quality, and accessibility of water. For reporting Disclosure 303-1, a water-stressed area can be defined based on the following indicators and thresholds:

- Baseline water stress is above medium to high range (20-40%); or
- Average annual monthly depletion is above 'medium depletion' (dry year)

2 Water supplied by a third party can include wastewater from another organization, municipal water supplies, or water from other public or private utilities. Withdrawal includes water for cooling, or water withdrawn for any other purpose or process. Where relevant, the reporting organization can include produced water in total water consumption. Water consumption can typically be calculated as total water withdrawals minus total water discharges. If information is estimated or modelled, rather than sourced from direct measurements, the organization is expected to explain its approach for doing so.

**Disclosure 303-2 Water discharge**

**Reporting requirements**

**The reporting organization shall report the following information:**

- a. Total water discharge, in megaliters, with a breakdown by the following types of destination, if applicable:
  - i. Surface water, including water from wetlands, rivers, and lakes;
  - ii. Groundwater;
  - iii. Seawater/ brackish surface water;
  - iv. Third-party water, including water to treatment plants and water to other organizations.
- b. Total water discharge, with a breakdown by either:
  - i. level of treatment (no treatment, primary, secondary, tertiary); or
  - ii. water quality.
- c. An explanation of how the organization determines its levels of treatment or defines quality levels, where applicable.
- d. The substances of concern for which discharges are treated, including:
  - i. the discharge limits set for each substance;
  - ii. an explanation of how the limits are set, or why no limits are set;
  - iii. performance against the limits.
- e. Standards, methodologies, and assumptions used. 2.3 When compiling the information specified in

**The reporting organization should:**

2.3.1 where relevant, report separately the volume of water discharge that is used by other organizations;

2.3.2 explain how it identified substances of concern.

**Guidance**

**Guidance for Disclosure 303-2-a**

See the example table 1 in Guidance for Disclosure 303-1 for one way to report water discharge by destination.

**Guidance for Disclosures 303-2-b and 303-2-c**

Water treatment involves physical, chemical or biological processes that improve water quality by removing solids, pollutants and organic matter from wastewater. Minimum requirements for treatment can be specified in national, state, or local legislation; however, the reporting organization is expected to consider its overall water discharge impacts and the needs of other water users in setting quality or treatment standards.

See the example table 2 in Guidance for Disclosure 303-1 for one way to report water discharge by destination and quality or level of treatment.

If reporting water discharge by level of treatment, the following categories are to be used:

- Primary treatment aims to remove solid substances that settle or float on the surface of water;
- Secondary treatment aims to remove substances and materials that have remained in the water, or are dissolved or suspended in it;
- Tertiary treatment aims to upgrade water to a higher level of quality before it is discharged or reused. It includes individual processes that remove, for example, heavy metals, nitrogen and phosphorous. An organization may withdraw and discharge water of good quality, which does not require treatment. If so, the organization can explain this in its response to Disclosure 303-2-c.

If reporting water discharge by quality, the organization is required to explain how it defined the levels of quality.

As one approach, the organization can use the quality categories defined by the Minerals Council of Australia (MCA):

- Category 1: Water is of a high quality and may require minimal and inexpensive treatment (for example disinfection and pond settlement of solids) to raise the quality to appropriate drinking water standards;
- Category 2: Water is of a medium quality with individual constituents encompassing a wide range of values. It would require moderate level of treatment such as disinfection, neutralization, removal of solids and chemicals to meet appropriate drinking water standards;
- Category 3: Water is of a low quality with individual constituents encompassing high values of total dissolved solids, elevated levels of dissolved metals or extreme levels of pH. It would require significant treatment to remove dissolved solids and metals, neutralize and disinfect to meet appropriate drinking water standards.

See reference 6 in the References section.

**Guidance for Disclosure 303-2-d**

'Discharge consent' is a permission that is granted to an organization, allowing it to discharge a set amount of effluent. Unauthorized discharges that exceed these limits are to be reported under Disclosure 303-2-d. The organization can also describe any plans to reduce unauthorized discharges in the future.

**Background.** An increase in the total volume of water discharge do not necessarily correspond to greater negative impacts, since these impacts depend on the quality of the water discharged and the sensitivity of the destination. An organization with greater water discharge, but a higher level of treatment and quality, can have positive impacts on local water destinations.

## Disclosure 303-3 Spills and leaks

### Reporting requirements

**The reporting organization shall report the following information:**

- a. Volume of each significant spill or leak, the location, and the substance.
  - b. Impact of each significant spill or leak on affected water bodies, environments, and local communities.
  - c. An explanation of how the organization is addressing the impacts.
  - d. Number and description of regulatory violations for significant spills and leaks.
- 2.4 When compiling the information specified in Disclosure 303-3, the reporting organization shall describe how it has identified the threshold for reporting significant spills and leaks, where applicable.

#### Guidance

##### Guidance for Disclosure 303-3

In the context of the GRI Standards, a spill is the accidental and sudden release of a substance that can affect human health, flora and fauna, water bodies, ground water, and land. A leak is the gradual release of such a substance.

Disclosure 303-3 is concerned with spills and leaks into water as well as onto land, which can affect underground water sources. The substance of the spill or leak can be classified as oil, fuel, wastes, chemicals, or wastewater; or another substance, as specified by the reporting organization.

When describing the impacts of a spill or leak, the organization can describe the impact on exposure pathways and recipient profiles. A regulatory violation is an incident that incurs a fine, penalty, or enforcement order. When describing a regulatory violation, it can be useful for the organization to include the monetary value of fines.

#### Disclosure 303-4 Water impacts in the supply chain and related to products and services

##### Reporting requirements

If water impacts are material in the supply chain, or due to its products and services, the reporting organization shall report the following information:

- a. A description of water-related impacts in the supply chain or due to its products and services, and the approach for identifying them, including any tools or methodologies used.
- b. A description of how the organization is addressing these impacts, including its engagement with significant suppliers or customers.

2.5 When compiling the information specified in Disclosure 303-4, the reporting organization should report:

- 2.5.1 total water withdrawal and consumption by significant suppliers in water-stressed areas;
- 2.5.2 the percentage of water-discharging suppliers that have set minimum standards for the quality of their water discharge.

#### Guidance

##### Guidance for Disclosure 303-4

Through its suppliers, activities, products, and services, the reporting organization can affect both the quality as well as the availability of water. The organization's overall approach for managing water-related impacts, both in its own operations and elsewhere in the value chain, is required by Disclosure 103-2 in *GRI 103: Management Approach*. Disclosure 303-4 requires additional information on impacts in the supply chain, and/or the impacts related to products and services, if the organization has identified them as material.

Tools or methodologies for identifying water-related impacts can include lifecycle assessments, environmental impacts assessments, water footprints, and scenario analysis. If information is estimated or modelled, rather than sourced from direct measurements, the organization is expected to explain its approach for doing so.

Water impacts related to products and services may be addressed by, for example, improved product design, providing information and advice about the responsible use of products and services; and consulting regularly with users. In the context of this Standard, significant suppliers are high-volume suppliers, suppliers of critical components, and non-substitutable suppliers; and/or suppliers of water-intensive commodities or services.

When reporting on its engagement with suppliers, it can be useful for the organization to include: • the number of suppliers it engages with; • the results of the engagement; • the proportion of suppliers from which it requests information; how much of total procurement this proportion represents an explanation of why it does not request information from suppliers; • its future plans and goals for working with suppliers on water-related impacts.

## Annex –Defined Terms

*This Annex contains new or revised terms and definitions for use with GRI 303: Water and Effluents. These terms will eventually be incorporated into the GRI Standards Glossary. Additional defined terms referenced in this draft can be found in the GRI Standards Glossary.*

### effluent

treated or untreated wastewater that is discharged

### river basin

area of land from which all water flows into a specific river

### water consumption

the use of water that is not returned to its original source

Note: Consumed water includes water that has evaporated, transpired, been incorporated into products, produced crops or waste, consumed by humans or livestock, polluted to the point of being unusable by other users, or otherwise permanently removed from its source.

**Comentário [P8]:** Does include water to energy /cooling sector?

### water discharge

the sum of effluents, used water, and unused water released to surface and sub-surface water resources or to third parties for treatment

Note 1: In the context of the GRI Standards, water discharge does not include domestic sewage.

Note 2: Water discharge can be authorized (according to discharge consent) or unauthorized (if discharge consent is exceeded).

**Comentário [P9]:**  
"Effluents" (treated/reusable and no reusable) are part of "Used water"?  
So is it double counting?  
Or:  
The sum of water not consumed  
outflows, used (including effluents),  
unused and reused, released to surface  
and sub-surface water...

### water stress

ability, or lack thereof, to meet human and ecological demand for water

Note 1: Water stress includes the availability, quality, and accessibility of water.

Note 2: Water stress has subjective elements and is assessed differently depending on societal values, such as the suitability of water for drinking or the requirements to be afforded to ecosystems.

### water withdrawal

water removed from the ground or a surface-water source, harvested from rainwater, or supplied by a third party

## REVIEW AND PROPOSAL FOR:

### GRI 303: Water and Effluents

#### A. Overview

This Standard is part of the set of GRI 15 Sustainability Reporting Standards (GRI 16 Standards). These Standards are designed to be used by organizations to report about their impacts on the economy, the environment, and society. The GRI Standards are structured as a set of interrelated, modular standards.

The primary objective was to review the content of *GRI 303* in order to represent internationally-agreed best practice and to align with recent developments in water management and reporting practice. Key references for revising the content included international authoritative instruments, such as the UN Resolution A/RES/64/292 (The human right to water and sanitation) as well as Goal 6 of the Sustainable Development Goals, which emphasizes access to clean water and sanitation. In addition, the project aimed to better align the Standard with key concepts in other reporting frameworks and standards such as CDP, SASB,

This Standard includes disclosures on the management approach and topic-specific disclosures. These are set out in the Standard as follows:

- Management approach disclosures (this section references *GRI 103*)
- Disclosure 303-1 Water withdrawal and consumption
- Disclosure 303-2 Water discharge
- Disclosure 303-3 Spills and leaks
- Disclosure 303-4 Water impacts in the supply chain and related to products and services

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There are many types of approaches depending on objectives and focus. The combination of management components to use information and data may be defined within various frameworks. Some issues differ in wording and focus regarding the domain expertise of groups. After consulting documents provided by some institutions (e.g. FAO, OCDE, JRC, EEA etc.), it was possible to identify a set of approaches in the field of water, regarding more specific agriculture/irrigation, environmental, climate and research issues. Following an attempt to an integrated explanation, this proposal is intended to contribute to the water management approach, defining a slightly different basis to develop water related disclosures. In this context also the GRI 303 title could be changed, considering that "effluent" is a particular condition of water discharge.

### GRI 303: Water Management Sustainability

## Disclosure 303-I Water withdrawal

**Keywords:** Sources, Allocation

**Metrics and Units:** volumes (hm<sup>3</sup>) and %

**Approach and priority topics/concepts:**

"Source" concepts also based on the water cycle to report components as rainwater, evapotranspiration and inflows. Inflows are volumes related to surface water and groundwater and correspond to renewable freshwater resources (RFR). Water withdrawn is allocated/distributed to facilities/sectors: irrigation, public, industry, energy.

### Reporting requirements

The reporting organization shall report the following information:

- a. Total water withdrawal from water-stressed areas, with a breakdown by the following sources, if applicable:
  - i. RFR - Surface water, including rainwater, water from wetlands, rivers, and lakes;
  - ii. RFR - Groundwater;
  - iii. Seawater/ brackish surface water, harvested rainwater;
  - iv. Third-party water.
- b. Total water withdrawal (from all areas), with a breakdown by the following sources, if applicable:
  - i. RFR - Surface water, including rainwater, water from wetlands, rivers, and lakes;
  - ii. RFR - Groundwater;
  - iii. Seawater/ brackish surface water, harvested rainwater;
  - iv. Third-party water.
- c. Standards, methodologies, and assumptions used.

2.1 When compiling the information specified in Disclosure 303-I, the reporting organization shall:

- 2.1.1 use publicly available and credible methodologies for assessing water-stressed areas;
- 2.1.2 report withdrawal in megaliters (ML) or % related to RFR or sectors;
- 2.1.3 if the original sources of water supplied by third parties are known, report these sources.

### Reporting recommendations

2.2 When compiling the information specified in Disclosure 303-I, the reporting organization should:

- 2.2.1 report water withdrawal by source at each facility-sector in a water-stressed area;



## Disclosure 303-2 Water discharge and consumption

**Keywords:** Availability, Destination.

**Metrics and Units:** volumes and mm

**Approach and priority topics/concepts:**

Corresponding to the other side of the equation, conceptually opposite to disclosure 303-1. Water withdrawn is available to each sector, but in this approach the water may be consumed (and not returning to source) or not consumed/discharged. For example, a water amount is available to irrigation, as the sector of destination. Then, related to the efficiency of the application, a part of that amount is consumed as crop evapotranspiration and production and another part is discharged.

**Reporting requirements**

The reporting organization shall report the following information:

- a. Total water discharge from water-stressed areas, with a breakdown by the following types of destination, if applicable:
  - i. Surface water, including water from wetlands, rivers, and lakes;
  - ii. Groundwater;
  - iii. Seawater/ brackish surface water;
  - iv. Third-party water, including water to treatment plants and water to other organizations.
- b. Total water discharge from all areas, with a breakdown by the following types of destination, if applicable:
  - i. Surface water, including water from wetlands, rivers, and lakes;
  - ii. Groundwater;
  - iii. Seawater/ brackish surface water;
  - iv. Third-party water, including water to treatment plants and water to other organizations.
- c. Total water consumption (water destination is not linked to its original source) from water-stressed areas
- d. Total water consumption (water destination not linked to its original source) from all areas.
- e. Standards, methodologies, and assumptions used.

2.3 When compiling the information specified in Disclosure 303-2, the reporting organization shall:

2.3.1 use publicly available and credible methodologies for assessing water-stressed areas;

2.3.2 report discharge and consumption in megaliters (ML) or mm;

**Reporting recommendations**

2.4 When compiling the information specified in Disclosure 303-2, the reporting organization should:

2.4.3 explain how it has calculated water consumption, including any specific factors or assumptions;

2.4.4 report water consumption, at each facility in a water-stressed area;

2.4.5 where relevant, report separately the volume of water discharge that is used by other organizations

**Guidance**

*Guidance for Disclosure 303-2-a*

See the example table I in Guidance for Disclosure 303-1 for one way to report water discharge by destination.

Where relevant, the reporting organization can include produced water in total water consumption. Water consumption can typically be calculated as total water withdrawals minus total water discharges. If information is estimated or modelled, rather than sourced from direct measurements, the organization is expected to explain its approach for doing so.

*Guidance for Disclosure 303-2-d*

'Discharge consent' is a permission that is granted to an organization, allowing it to discharge a set amount of effluent. Unauthorized discharges that exceed these limits are to be reported under Disclosure 303-2-d. The organization can also describe any plans to reduce unauthorized discharges in the future.

**Background.** An increase in the total volume of water discharge do not necessarily correspond to greater negative impacts, since these impacts depend on the quality of the water discharged and the sensitivity of the destination. An organization with greater water discharge, but a higher level of treatment and quality, can have positive impacts on local water destinations.

## Disclosure 303-3 Water use and quality

**Keywords:** Performance, Quality

**Metrics and Units:** % and quality related units

**Approach and priority topics/concepts:**

Main focus to evaluate used, unused and reused water. Parameters of performance and quality. Performance related to efficiency of use and of application. Losses related to efficiency, spills and leaks. Wastewater and saline water. Water treatment. Effluents and recycling water.

### Reporting requirements

The reporting organization shall report the following information:

- a. Total water withdrawn, consumed and discharged, with a breakdown by either, where applicable:
  - i. used, unused or reused;
  - ii. level of treatment (no treatment, primary, secondary, tertiary); or
  - iii. water quality.
- b. An explanation of how the organization determines its levels of treatment or defines quality levels, where applicable.
- c. The substances of concern for which discharges use water is treated, including:
  - i. the discharge limits set for each substance;
  - ii. an explanation of how the limits are set, or why no limits are set;
  - iii. performance against the limits.
- d. Volume of each significant spill or leak, the location, and the substance.
- e. Impact of each significant spill or leak on affected water bodies, environments, and local communities.
- f. An explanation of how the organization is addressing the impacts.
- g. Number and description of regulatory violations for significant spills and leaks.

2.5 When compiling the information specified in Disclosure 303-3, the reporting organization shall:

2.5.1 describe how it has identified the threshold for reporting significant spills and leaks, where applicable.

### Reporting recommendations

2.6 When compiling the information specified in Disclosure 303-3, the reporting organization should:

2.6.1 break down total water withdrawal by quality;

2.6.2 report the volume of water recycled and reused as a percentage of total water withdrawal;

2.6.3 explain how identify substances of concern

#### Guidance for Disclosure 303-3

In the context of the GRI Standards, a spill is the accidental and sudden release of a substance that can affect human health, flora and fauna, water bodies, ground water, and land. A leak is the gradual release of such a substance.

Disclosure 303-3 is concerned with spills and leaks into water as well as onto land, which can affect underground water sources. The substance of the spill or leak can be classified as oil, fuel, wastes, chemicals, or wastewater; or another substance, as specified by the reporting organization.

When describing the impacts of a spill or leak, the organization can describe the impact on exposure pathways and recipient profiles. A regulatory violation is an incident that incurs a fine, penalty, or enforcement order. When describing a regulatory violation, it can be useful for the organization to include the monetary value of fines.

Water treatment involves physical, chemical or biological processes that improve water quality by removing solids, pollutants and organic matter from wastewater. Minimum requirements for treatment can be specified in national, state, or local legislation; however, the reporting organization is expected to consider its overall water discharge impacts and the needs of other water users in setting quality or treatment standards.

See the example table 2 in Guidance for Disclosure 303-1 for one way to report water discharge by destination and quality or level of treatment... [Tables requiring some changes.](#)

If reporting water discharge use by level of treatment, the following categories are to be used:



- Primary treatment aims to remove solid substances that settle or float on the surface of water;
- Secondary treatment aims to remove substances and materials that have remained in the water, or are dissolved or suspended in it;
- Tertiary treatment aims to upgrade water to a higher level of quality before it is discharged or reused. It includes individual processes that remove, for example, heavy metals, nitrogen and phosphorous. An organization may withdraw and discharge water of good quality, which does not require treatment.

If reporting water **discharge use** by quality, the organization is required to explain how it defined the levels of quality. As one approach, the organization can use the quality categories defined by the Minerals Council of Australia (MCA):

- Category 1: Water is of a high quality and may require minimal and inexpensive treatment (for example disinfection and pond settlement of solids) to raise the quality to appropriate drinking water standards;
- Category 2: Water is of a medium quality with individual constituents encompassing a wide range of values. It would require moderate level of treatment such as disinfection, neutralization, removal of solids and chemicals to meet appropriate drinking water standards;
- Category 3: Water is of a low quality with individual constituents encompassing high values of total dissolved solids, elevated levels of dissolved metals or extreme levels of pH. It would require significant treatment to remove dissolved solids and metals, neutralize and disinfect to meet appropriate drinking water standards.

See reference 6 in the References section.

## Disclosure 303-4 Water vulnerability and impacts

**Keywords:** Demand, Supply

**Metrics and Units:** indicators/indices ratios; time and spatial scales

**Approach and priority topics/concepts:**

Risk approach related to overexploitation, droughts, dryness and stress. Ecosystems preservation and integrated management (water, soil, climate, vegetation). Services and solutions related to water savings. Water needs, shortage and footprint. Indices: vulnerability, water stress, scarcity and aridity. For example: WEI – Water Exploitation Index; WSI – Water Stress Index.

### Reporting requirements

If water impacts are material in the supply chain, or due to its products and services, the reporting organization shall report the following information:

- a. A description of water-related impacts in the supply chain or due to its products and services, and the approach for identifying them, including any tools or methodologies used.
- b. A description of how the organization is addressing these impacts, including its engagement with significant suppliers or customers.

### Reporting recommendations

2.7 When compiling the information specified in Disclosure 303-4, the reporting organization should report:

- 2.7.1 total water withdrawal and consumption by significant suppliers in water-stressed areas;
- 2.7.2 the percentage of water-discharging suppliers that have set minimum standards for the quality of their water discharge.

2.7.3 the classification of water stress using an index at micro and/or macro scales.

### Guidance

#### *Guidance for Disclosure 303-4*

Through its suppliers, activities, products, and services, the reporting organization can affect both the quality as well as the availability of water. The organization's overall approach for managing water-related impacts, both in its own operations and elsewhere in the value chain, is required by Disclosure 103-2 in *GRI 103: Management Approach*. Disclosure 303-4 requires additional information on impacts in the supply chain, and/or the impacts related to products and services, if the organization has identified them as material.

Tools or methodologies for identifying water-related impacts can include lifecycle assessments, environmental impacts assessments, water footprints, and scenario analysis. If information is estimated or modelled, rather than sourced from direct measurements, the organization is expected to explain its approach for doing so.

Water impacts related to products and services may be addressed by, for example, improved product design, providing information and advice about the responsible use of products and services; and consulting regularly with users. In the context of this Standard, significant suppliers are high-volume suppliers, suppliers of critical components, and non-substitutable suppliers; and/or suppliers of water-intensive commodities or services.

When reporting on its engagement with suppliers, it can be useful for the organization to include: • the number of suppliers it engages with; • the results of the engagement; • the proportion of suppliers from which it requests information; how much of total procurement this proportion represents an explanation of why it does not request information from suppliers; • its future plans and goals for working with suppliers on water-related impacts.

## 5. Comments from Dr. Prachi Ugle Pimpalkhute (personal feedback)



*Eco Endeavourers Network*  
...Striving for the planet in peril

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### GRI Standards - GRI 303: Water and Effluents: Review Primer

#### Background:

At the outset, Eco Endeavourers Network sincerely congratulate the Global Reporting Initiative Organization for having come up with commendable revision and transition of GRI guidelines over the years, and with the recent transition from GRI G4 guidelines to GRI standards launch for sustainability reporting, it has given companies a new dimension of disclosure of aspects that are material to it and to be more transparent towards reporting their environmental, social and economic impacts. From the Indian context point, a further landmark framework is the recent linkage document of SEBI Business Responsibility Reporting and GRI standards. The linkage has given Indian companies to comply to meet both national and international standards together.

GRI standards with regard to water and effluents (GRI: 303) and occupational health and safety (GRI: 403) for public comments is open and under review for proposed changes. Eco Endeavourers Network focal point is the zeal to gain knowledge base and develop an understanding of water impacts in stressed areas and water risks in supply chain, with this in background we would wish to leverage this opportunity to put forth some of key points and comments which my network discussed recently as a part of discussion event held by us on 11<sup>th</sup>, 18<sup>th</sup>, 25<sup>th</sup> September and 2<sup>nd</sup> October, 2017 so as to learn, upgrade our understanding of reporting as sustainability practitioners. The focus point for discussion event was considering the thought process with regard to how Indian companies would perform and report impacts in water stress areas and water impacts across supply chain and also aimed to foresee the challenges the companies would face while reporting once the standards sets into being, since GRI G4 guidelines will be phased out by July 2018.

I sincerely thank GRI for providing a platform for public comments and feedback, as it provided a strong base to read the standards framework in much detail and helped develop thorough understanding of the standards under review, approach to be applied, strategy, accountability and transparency of water impacts disclosure. I am herewith sincerely submitting and putting forth the discussion event key points, comments and questionnaire as a primer to your organization for your kind perusal.

#### Discussion event key points, comments and questionnaire:

- As mentioned by GRI - Reporting on water consumption in addition to water withdrawal with focus on stress areas is the new requirement for companies to report. The question is how with regard to local challenges and availability, companies extent of transparency in disclosure is the key criteria to be looked upon?
- Emphasis on water discharge is being given – Hope it will help in strengthening treatment strategies and decision making.

- Whether moving ahead water and climate change linkage will be added upon after 9<sup>th</sup>, 2017 October for companies to report on in lieu of Paris climate change agreement?
- Whether water risk in the context of climate change will be an added feature?
- Commendable addition by GRI - Water related social impacts at local level for reporting is one of the significant additions to the standards.
- From how and where water is used and discharged is added. ...can there be an attribute of when as timing, seasonal variation too reflects dynamics of water impacts on the environment?
- Any limits per se for the reporting organizations on extent of third party water in water stress areas? This attribute will be the key one to looked for by companies once the new set of standards are set into being.
- Water impacts across the entire supply chain given the scenario of water stressed areas – what would be the extent of engagement with suppliers and goal setting.
- Whether Return on investment (ROI) with regard to water stewardship in water stress areas for reporting companies applicable in terms of water risks and opportunities and are they a part of organization water strategy? Pointed this question as GRI standards fit under purview of investment based decisions.
- Cost of water, expenditure on water conservation activities to reduce the effects of business operations on environment, amount spent.
- Mining industries – Companies would face increased scrutiny, especially when operating in water stressed areas.
- Without being aware and consistent about the local challenges, water stress and scarcity – water risks cannot be measured accurately - interpretation of inefficiencies and highlighting where risks occur.
- Investment decision making – to convince and communicate that water risks will not affect long term growth prospects, particularly critical to water stress or scarce regions.
- Measuring water impact – approach for the sector – monitor water use – determines whether to measure the company direct operations or also include indirect supply chain water use. Since from textiles to mining all businesses are water dependants.
- Disclosure by companies on any other users who have access to same source of water and how they use it together in tandem, any benchmarks set?
- What are the major water consumption and effluent disposal points (green, blue, grey) within your supply chain? Green referring to bio-filtration, ecological treatment systems (sustainable drainage system); Blue referring to high efficiency devices and retrofits settings to check excess water consumption. And finally grey referring to pipes, tanks, treatment plants including energy-intensive water treatment systems.

- Example scenario discussed: Coke and Pepsi-co – operate in water stress areas - water intensive industries in water stress areas critical parameter of discussion.
- Emergence of new challenge the companies will face even when using surface water.
- With variability in rainfall pattern due to climate change, demand for water from population, coal vulnerability in water stress areas is bound to occur.
- Commendable revision by GRI : Water use relation to supply chain was neglected, in revised standards given weightage
- Water footprint of a company – direct (operational), indirect (supply chain)
  - Example scenario : Beverage companies - value water – recent times – no longer a commodity – growing realization that biggest water risks is not at it their factories, it's in their supply chain.
  - Point discussed: Failure to address water risk can have impact on cash flow, brand / reputation and corporate value. Water risks integral part of corporate governance.
  - For companies operating in abundant /surplus water regions can also be vulnerable as the supply chain of most companies is stretched across the globe.
  - India faces high to extremely high water stress and since many of industries be it beverage, food, mining, textile, utility industries operate in water stress areas - transparency and regulation in extent of water withdrawal framework will be critical parameters.
- Does Water conflict with local communities over access to water is being addressed? On the environmental front, GRI revised draft has provided commendable disclosure format for companies to address. A further socio-economic attribute with focus on impact valuation, ROI is it being planned to be added?
- Water metering and monitoring to check excess of water withdrawal and to cap the extent of water withdrawal in vulnerable areas are being considered for addition after review, as the current draft does not have information with regard to it.

#### Rationale:

- Assist in monitoring water consumption rate, water levels, withdrawal, balance, flow rates, water quality and pollution.
- Water metering by companies will help them know actual consumption in real time and amount incurred.
- Will help detect water leaks and negate the negative impact of excess water usage. Water metering and monitoring can be an effective way to monitor water use – help us track water annual consumption and benchmarking.
- The revised GRI 303 Standard mentions - that it will help reporters to be clearer about the impact they have on water, at whatever stage in their value chain, and also



about what actions they need to take to address those impacts: Would be interested to know and whether the revised standards after review shall address this attribute in stressed areas as well and if yes, then how water risks are being considered for company valuations?

#### Way Forward:

Hope to see the revised standards after the phase of public comments and feedback, when set into being would enable companies to be more transparent and accountable while reporting their water impacts. As the companies are advancing the state of sustainability reporting in India, we as a developing country and being considered as one of the emerging economies in recent times, look forward to stimulate our reporting approach and set strategies for a more transparent and accountable disclosure by organizations on their water impacts, water and effluent management, water impacts in supply chain and with regard to products and services, content /composition of effluent discharge and more importantly of water impacts in water stressed areas.

*"Water proofing"* by companies operating in vulnerable and water stressed areas will be the key challenge and can it be considered as a strategy / approach / goal setting / benchmarking tool to foresee future water risks and convert these risks into opportunities for companies so as to plan, project and implement management policies across the entire value chain.

#### About Eco Endeavourers Network

##### *Our Beginning*

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The "Eco Endeavourers Network" (EEN) was started in June 2009 as an awareness and research network with the aim to foster environmental issues at the forefront and to sensitize school children, college students about it. It also aimed to involve researchers, scientists and faculty in the domain of Environmental Science to contribute through thought leadership concepts, research and development in the subject matter of – Sustainability, Climate Change, Environmental Impact Assessment, Environmental Education & Training, Greenhouse gases quantification, Remote Sensing & GIS applications, Environmental Management, Clean Development Mechanism, Corporate Sustainability Reporting, Ecosystem & Forestry Services - Research & Development, Corporate Social Responsibility (CSR), PIL and RTI, Urban Greening, Urban Forestry and Biodiversity.

To place in nutshell EEN will strive to work towards "Environmental Stewardship" across varied sectors, organizations, educational institutions and housing societies with the perspective of awareness, learning and forming a passionate and innovative network base to resolve day to day problems in a simple yet innovative way and be a forum for "citizen participation".

##### *Vision*

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To create awareness, carry out research, disseminate knowledge and capacity building as a team to promote environmental friendly and sustainable policies and channelize the outcomes through this thought leadership platform.

#### Contact Focal Point

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Dr. Prachi Ugle Pimpalkhute  
Founder, EEN

A brief background of myself - I have done my PDF (Post-Doctoral Research) at CiSTUP, IISc, Bangalore, India (2010-2011) on Carbon Sequestration Potential of Urban Trees, I did my PhD in Environmental Science (Environmental Impact Assessment for Sanathnagar Industrial Area, Hyderabad, India - A Case Study) from Osmania University, Hyderabad, India (2005-2009). I did my Masters in Environmental Science from Osmania University, Hyderabad, India (2002-2004). Currently I am the Founder of Eco Endeavourers Network started by me and my role is being the subject matter specialist, content framework planner and executor and citizen outreach person of the network. I have earlier worked in the field of Climate Change & Sustainability, CSR, Greenhouse Gases reporting, analysis of companies Business Responsibility Reports (BRRs) as per SEBI expectations at RSM GC Advisory, Navi Mumbai, Maharashtra, India from October 2013 till May 2017. I have over 9 years of experience in environmental sector with strong technical and analytical skills which has enabled me to contribute my knowledge and experience in implementation of environment friendly policies that have benefited both the organization and associated stakeholders and also learn and grow in the process as an individual. I have earlier worked in various organizations of repute - CSRE, IIT Bombay, India as Research Scientist, SIES - IIEM Nerul, Navi Mumbai, India as a visiting faculty for Environmental Management and Sustainability topics in 2013 for P.G Diploma students of Environmental Management, ESCI (Centre for Climate Change Hyderabad, Telangana, India) as fellow, CRIDA, Hyderabad, India on Carbon Finance for improving the livelihood of small holders - National Agricultural Innovation Project as SRF, Assistant Professor - Environmental Studies (Malla Reddy Engineering College, Hyderabad, Telangana, India), National Remote Sensing Centre, ISRO Centre Hyderabad, Telangana, India - Forestry & Ecology Division, as JRF on the project Ecologically Sensitive Areas, Lecturer - Environmental Biology and Instrumentation for Masters Students of Zoology at Amrat Kapadia Navjeevan Women's College, Hyderabad, Telangana, India and Project Assistant - Groundwater Division - NGRI, Hyderabad, Telangana, India

Basically a researcher with sound knowledge in Sustainability, CSR, climate change mitigation, Clean Development Mechanism, Urban greening, Environmental Impact Assessment, air pollution monitoring, greenhouse gases emission inventory, Remote Sensing and GIS, Biodiversity Conservation, Forestry and Ecosystem Services.

#### Strive with us

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Students, researchers, academicians, consultants and other representatives from Environmental domain are welcome to join us and be the part of our endeavour motto of "striving for the planet in peril" - with the perspective "our planet and our future - Let's strive together."

### *Contact Us*

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You can email us at our official email handle: [ecoendeavourers@gmail.com](mailto:ecoendeavourers@gmail.com)

#### Follow us at:

Our facebook page: <http://fb.me/ecoendeavourers>

Our LinkedIn page: <https://www.linkedin.com/company/eco-endeavourers-network>

Our Twitter page : <https://twitter.com/EcoEndeavourers>

Contact Number: Upon request



## 6. *Comments from Hongqiang Ren (personal feedback)*

### **Comments on “Exposure draft of GRI 303: Water and Effluents”**

1. Line 170, In section 1.2, is it necessary to describe the source of water?
2. Line 224, The reporting source information of (a) and (b) is exactly same. Is this correct? If correct, the two parts can be combined as they contain duplicated information.
3. Line 321, nitrogen and phosphorous are usually removed in the secondary treatment.
4. Line 348, The causes of the spills and leaks and the prevention approaches may also be reported.
5. Line 366, If water impacts in the supply chain, the substances in water causing the impacts may also be reported.

## 7. Comments from William Sarni (personal feedback)

- Why isn't water reuse and recycling required? It is one of the most significant trends in water management/stewardship.
- Lines 102 - 104. I would add ecosystems. Water is critical for ecosystem health and in some countries mandated by law (South Africa).
- Line 126 - absorption of pollution. Water should be treated prior to discharge as opposed to relying upon "absorption" of pollutants by the natural systems.
- Line 187 - consistently use the term "value chain" instead of supply chain. for some companies the downstream use of water is important. For example, consumer products companies - soap, shampoos, etc.
- Line 244 - 303-1 a.i. Add air moisture capture as an alternative source of water - this is a significant new technology. Also, I would not include rainwater as surface water.
- Line 244 - 303-1 b. ii. Consider breaking out groundwater into fresh and brackish. Brackish water desalination is an increasing trend in places like Texas.
- Line 279 - define "Third Party Water" - is this from water utilities or other industry sectors?
- Line 358 - consistent use of groundwater instead of underground water.
- Line 366 b. Change supply chain to value chain.

Please let me know if you have any questions and would like to discuss.

Thanks again for the opportunity to comment.

Best,

Will

WILL SARNI | WATER INNOVATOR | Technology, Strategy, Data  
| [waterfoundry.com](http://waterfoundry.com) |



## 8. Comments from Hayley Zipp (on behalf of ICMM)

### ICMM comment on the exposure draft of *GRI 303: Water and Effluents* (10 August 2017)

- ICMM members acknowledge the opportunity to be represented on the GRI working group during the development of this *exposure draft*; and the opportunity to provide feedback during the public consultation phase. We acknowledge the attempts made by GRI to align with the ICMM water reporting guidance (A practical guide to consistent water reporting, March 2017); and particularly appreciate the two webinars run by GRI for ICMM members on Wednesday 27 September 2017.
- ICMM's specific comments to the definitions and reporting requirements proposed in the exposure draft are outlined below, in Tables 1 and 2 respectively.

**Table 1 – ICMM comment on proposed (reordered, non-alphabetic) definitions**

Please note: in the following table, the term “ICMM guidance” refers to the ICMM document *A practical guide to consistent water reporting* (March 2017) and associated minimum disclosure standard – available at [https://www.icmm.com/website/publications/pdfs/water/170315\\_water-reporting-guidance\\_en.pdf](https://www.icmm.com/website/publications/pdfs/water/170315_water-reporting-guidance_en.pdf).

Terms and Definitions	ICMM Response
<b>Effluent</b> – treated or untreated wastewater that is discharged	Recommend further clarification of the term “wastewater”
<p><b>Impact</b> – in the GRI Standards, unless otherwise stated, ‘impact’ refers to the effect an organization has on the economy, the environment, and/or society, which in turn can indicate its contribution (positive or negative) to sustainable development</p> <p>Note 1: In the GRI Standards, the term ‘impact’ can refer to positive, negative, actual, potential, direct, indirect, short-term, long-term, intended, or unintended impacts.</p> <p>Note 2: Impacts on the economy, environment, and/or society can also be related to consequences for the organization itself. For example, an impact on the economy, environment, and/or society can lead to consequences for the organization’s business model, reputation, or ability to achieve its objectives.</p>	No comment
<b>River basin</b> – area of land from which all water flows into a specific river	Recommend harmonizing terminology by adding guidance note that a “river basin” may also be known as a “river watershed” or “river catchment”. Also, it should be noted that river basins and groundwater catchments do not always align.
<p><b>Water withdrawal</b> – water removed from the ground or a surface-water source, harvested from rainwater, or supplied by a third party</p> <p><i>Additional Note: withdrawal includes water for cooling, or <u>water withdrawn for any other purpose or process</u> (guidance line 271)</i></p>	<p>Acknowledge and support the revision of the water withdrawal source categories to align with ICMM guidance.</p> <p>However, to maintain consistency with previous GRI reporting, and ICMM guidance, <b>strongly recommend retaining the intent of the previous withdrawal definition</b> (i.e. “water drawn into the boundaries”) and rather than “water removed” from a given source (as proposed). Hence recommend rewording as the “water drawn into the boundaries within operational control and intended for use”.</p> <p>Acknowledge that the intent of the GRI Standards is to facilitate reporting of an organization’s impacts (economic, environmental and social). However, unlike carbon which may be considered at</p>

Terms and Definitions	ICMM Response
	<p>the global level, water is a local issue – where it is the local context which largely determines if a given practice has potential for significant (positive or negative) impact. To help address this complexity, strongly recommend that, consistent with the CEO Water Mandate guidelines, water impact disclosure should comprise three key components:</p> <ul style="list-style-type: none"> <li>a) characterisation of performance (factual) using relevant, standardised metrics (withdrawal, consumption and discharge);</li> <li>b) detail around material water-related impacts (positive or negative) drawn out by a number of direct reporting requirements (questions); and</li> <li>c) an overview of the organization’s management response (as GRI 103, points 1.1 – 1.3).</li> </ul> <p>Based on the above, propose that a definition of withdrawal based around “water drawn into the boundaries within operational control for intended use” would provide a more meaningful, and benchmarkable, insight into the organization’s factual water performance. This is particularly true for the mining and metals sector, which may abstract and directly discharge significant volumes of water (groundwater and/or surface water) to enable safe (dry) mining conditions, without any intent to draw the water into the boundaries of the organization for use. Incorporation of these volumes into the withdrawal definition will produce a distorted view of the industry’s water performance and material practices.</p> <p>In addition, any impacts associated with such water handling activities may be directly reported through relevant questions (e.g. reporting requirement 1.3.2).</p> <p>To ensure alignment and comparability of responses, <b>strongly recommend further definition or clarification of the term “harvested rainwater”</b> and exclude “incidental rainfall and runoff which occurs within the boundaries of an organization, but is not controlled for intended use or material to the organization’s operational water balance.”</p>
<p><b>Water consumption</b> – the use of water that is <u>not returned to its original source</u></p> <p>Note: Consumed water includes water that has evaporated, transpired, been incorporated into products, produced crops or waste, consumed by humans or livestock, polluted to the point of being unusable by other users, <u>or otherwise permanently removed from its source.</u></p>	<p><b>Strongly recommend aligning with the ICMM definition of consumption</b>, as: “the volume of water consumed by the site and <b>not returned to the water environment</b> or a third party” i.e. available for further beneficial use (ICMM guidance p 14) – for the following reasons.</p> <ol style="list-style-type: none"> <li>1) Defining water consumption on the basis of water not returned to the “water environment” rather than to “its original source” allows for transparent, factual reporting of one element of an organization’s water performance, together with relevant, standardised withdrawal and discharge metrics (see withdrawal response above). The next level of understanding is whether this activity (withdrawal, consumption and discharge) is sustainable, or is having material impacts (positive or negative). Water is a local issue, where a withdrawal of water from one source for discharge to another may, or may not, result in material impact depending on the</li> </ol>

Terms and Definitions	ICMM Response
<p><i>Additional Note: water consumption can typically be calculated as total water withdrawals minus total water discharges (guidance line 273)</i></p>	<p>local water context. Hence, the definition as proposed is less meaningful as it begins to combine factual characterisation with concepts around potential for impact. If the practice of withdrawing water from one source for discharge to another is having material impacts, these should be coherently and transparently disclosed through relevant questioning (e.g. reporting requirement 1.3.2).</p> <p>2) The consumption definition as proposed is technically flawed as rainfall represents a key element of the surface water source category of withdrawals. However, it is neither rational to consider returning rainfall to its original source; nor technically feasible to make any judgement around the potential loss of input to other sources due to rainfall interception (due to the highly complex, varied and locally determined nature of rainfall fate – e.g. recharge, runoff, evaporation, evapotranspiration or use). Further, this approach would mean that from a GRI reporting perspective, evaporating water would be perceived as a better outcome than releasing it back to the <b>water</b> environment or a third party where it would be available for further beneficial use. In fact, the inverse is true. Water can often be beneficially transferred from one mode to another – for example, groundwater of improved quality may be discharged to surface water for beneficial human or improved environmental use. In addition, water is continuously transferring between modes within the natural water cycle and environment (i.e. rainfall/evaporation, surface water and groundwater).</p> <p>3) Based on the consumption definition proposed, the guidance provided in line 273 that “water consumption can typically be calculated as total water withdrawals minus total water discharges” is technically flawed for two reasons. Firstly, this would result in double accounting of volumes of water discharged but not to their original source as both a discharge and a consumption. This will introduce a level of confusion and reduce the value of the response for benchmarking purposes. Secondly, a balance approach must allow for any changes in the volumes of on-site storage (<math>\Delta</math>Storage) during the reporting period, which may be significant for mining and metals operations. Hence, the ICMM metrics (see p15), with <u>associated definitions of withdrawal and discharge</u>, allow consumption to be estimated, for the reporting period, as:</p> $\text{Consumption} = \text{Total Withdrawal} - (\text{Total Discharge} + \Delta\text{Storage})$ <p>In addition, not being able to estimate water consumption volumes through a coarse water balance approach may disadvantage, or create barriers to, organizations commencing their water stewardship and GRI reporting journey, whom do not currently have more complete datasets.</p> <p>4) No guidance is given around the granularity or materiality of defining original source. For example, water withdrawn from groundwater may be returned to groundwater, but in a different aquifer system which may still have associated impacts; ditto for surface water. This approach</p>

Terms and Definitions	ICMM Response
	again confuses the two concepts of characterising performance using standardised metrics (withdrawal, consumption and discharge) with reporting impacts.
<p><b>Water discharge</b> – the sum of effluents, used water, and unused water released to surface and sub-surface water resources or to third parties for treatment.</p> <p>Note 1: In the context of the GRI Standards, water discharge does not include domestic sewage.</p> <p>Note 2: Water discharge can be authorized (according to discharge consent) or unauthorized (if discharge consent is exceeded).</p>	<p>Acknowledge and support the revision of the water discharge destination categories to align with ICMM guidance.</p> <p>However, <b>strongly recommend removing “unused” water from the definition</b> to maintain alignment with the ICMM guidance that discharged water is water removed from the boundaries of an organization after it has been used (i.e. tasked, treated or stored for use). This supports and consolidates the “water withdrawals” and “water consumption” recommendations and comments made above. This is particularly important for the mining and metals sector, which may discharge (i.e. directly return to the water environment) significant volumes of water (e.g. derived from orebody dewatering or storm-water control) to enable safe (dry) mining conditions, without any intent to draw the water into the boundaries of the organization for use. Incorporation of these volumes into the discharge definition will produce a distorted view of the industry’s water performance and material practices.</p>
<p><b>Water stress</b> – ability, or lack thereof, to meet human and ecological demand for water</p> <p>Note 1: Water stress includes the availability, quality, and accessibility of water.</p> <p>Note 2: Water stress has subjective elements and is assessed differently depending on societal values, such as the suitability of water for drinking or the requirements to be afforded to ecosystems</p>	No comment
<p><b>Water recycling and reuse</b> – act of processing used water and wastewater through another cycle before discharge to final treatment and discharge to the environment.</p> <p>Note: Water recycling and reuse can include wastewater recycled back in the same process or higher use of recycled water in the process cycle; wastewater recycled and reused in a different process, but within the same facility; and wastewater reused at another of the organization’s facilities.</p>	<p>Recommend that clearer definitions are provided for the terms “reuse” and “recycle”. <b>Strongly recommend reporting of a single efficiency metric</b> (i.e. not distinguishing between reuse and recycling); <b>and alignment with ICMM definitions</b>, where:</p> <ul style="list-style-type: none"> <li>• <b>Reuse</b> recognises water that has previously been used by the facility (worked), reclaimed and reused (in a task) without treatment.</li> <li>• <b>Recycle</b> recognises water that has previously been used by the facility (worked), reclaimed and treated before being used again.</li> </ul> <p>Suggest that more detailed guidance and examples around potential calculation approaches are added, including clarification around the inclusion of greywater (as per 2016). However, given the highly varied nature of processing facilities across all reporting sectors, suggest that an element of</p>

Terms and Definitions	ICMM Response
	flexibility in the calculation approach is allowed, which can accommodate the ICMM approach (which is based on a bespoke mine water accounting framework, the Mineral Council of Australia's Water Accounting Framework, hereafter referred to as MCA's WAF).



**Table 2 – ICMM comment on proposed reporting requirements**

Please note: in the following table, proposed **reporting requirements** (mandatory) are highlighted in **red**; and proposed **reporting recommendations** (optional) are highlighted in **grey**.

No.	Reporting Requirements	ICMM Response
<b>Disclosure 103 – Management Approach</b>		
<b>1.1</b>	The reporting organization <b>shall</b> report its management approach for water and effluents using GRI 103: Management Approach	No comment
<b>1.2</b>	The reporting organization <b>shall</b> :	
<b>1.2.1</b>	Describe its main uses of water, including how and where water is used and discharged	Recommend defining “water use” and distinction to “water consumption”. Recommend clarifying if this reporting requirement really focuses on the organisation’s management approach or its physical water dependency (i.e. more aligned to sections 303-1 and 303-2)?
<b>1.2.2</b>	Describe its approach for identifying impacts, including the scope of assessments, their timeframe, and any tools or methodologies used	No comment
<b>1.2.3</b>	Describe how it works with other stakeholders to manage water as a shared resource	No comment

No.	Reporting Requirements	ICMM Response
1.2.4	Describe any minimum standard it has set for the quality of discharges, and how the minimum standard was established	Recommend removal or consolidation with reporting requirement 2d, due to significant overlaps with requirements 2d and 2.3.2.
1.2.5	Explain the process for setting any goals and targets that are part of its management approach, including how they relate to public policy and the local context of each water stressed area	No comment
1.2.6	In cases where there are significant impacts from surface runoff, including agricultural runoff, describe these impacts and how they are managed	Recommend removing “agricultural runoff” which reduces the relevance of this reporting requirement to other sectors or activities.  For clarity, recommend providing additional guidance around what the term “surface runoff” includes. Suggest focus on “outside the boundary” releases which are not permitted through existing regularity mechanisms. Recommend that a couple of examples of “significant impacts from surface runoff” are provided for each sector – a potential example for the mining and metals sector may include acid mine drainage (AMD).
1.3	The reporting organization <b>should</b> :	
1.3.1	Provide an overview of how water use and effluent discharge is distributed across its value chain	See response to requirements 4a and 4b.
1.3.2	Identify the specific locations or river basins where it has significant impacts	No comment
<b>Disclosure 303-1: Water withdrawal and consumption</b>		
1	The reporting organization <b>shall</b> report the following information:	
1a	Total water withdrawal from water stressed areas, with a breakdown by the following sources, if applicable:	Recommend reframing as per the ICMM minimum disclosure standard, as “present the proportion of sites located in water stressed area”. This will provide a more meaningful

No.	Reporting Requirements	ICMM Response
	<ul style="list-style-type: none"> <li>i. Surface water, including rainwater, water from wetlands, rivers, and lakes;</li> <li>ii. Groundwater;</li> <li>iii. Seawater/ brackish surface water;</li> <li>iv. Third-party water.</li> </ul>	<p>insight into an organization's potential exposure to elevated risks and related impacts, associated with operating in water stressed areas. Reporting of water withdrawal volumes alone does not provide a clear indication of the relative importance of operations located in high risk (water stressed) areas to the organization.</p> <p>Recommend further defining "third-party water" and providing examples, including the classification of treated wastewater.</p>
<b>1b</b>	<p>Total water withdrawal (from all areas), with a breakdown by the following sources, if applicable:</p> <ul style="list-style-type: none"> <li>i. Surface water, including rainwater, water from wetlands, rivers, and lakes;</li> <li>ii. Groundwater;</li> <li>iii. Seawater/ brackish surface water;</li> <li>iv. Third-party water</li> </ul>	<p>Reporting withdrawal according to the GRI definition currently proposed (based on "water removed" from a given source) is less meaningful in characterising an organization's water performance than the previous approach of defining withdrawal as the "water drawn into the boundaries of an organization" – see response in definitions table above.</p> <p>Also suggest reordering – as seems counterintuitive to ask for total withdrawal volumes <b>after</b> water stressed area volumes</p>
<b>1c</b>	Total water consumption from water stressed areas	Reporting consumption according to the GRI definition will introduce inaccuracies in reporting and overinflate industry use – see response in definitions table above.
<b>1d</b>	Total water consumption (from all areas)	<p>Same response as 1c</p> <p>Also, suggest reordering – as seems counterintuitive to ask for total consumption volumes <b>after</b> water stressed area volumes.</p>
<b>1e</b>	Standards, methodologies, and assumptions used	Recognise that this provides important context for transparency and benchmarking. However, recommend providing further guidance around the relevance and materiality of the information sought and reported, to reduce reporting burden and ensure useability of the responses.
<b>2.1</b>	When compiling the information specified in Disclosure 303-1, the reporting organization <b>shall</b> :	
<b>2.1.1</b>	Use publicly available and credible methodologies for assessing water stressed areas;	Acknowledge the importance of requiring the use of credible methodologies for assessing water stress, including the publicly available tools proposed. However, it

No.	Reporting Requirements	ICMM Response
		must be recognised that the global datasets used by these tools may be grossly inaccurate at the local scale and/or contain very little groundwater information. <b>Strongly recommend reframing to suggest that assessments are based on analysis which combines the results of multiple tools and local knowledge</b> , where the details are provided in the response to 1e.
2.1.2	Report withdrawal and consumption in megaliters (ML);	No comment
2.1.3	If the original sources of water supplied by third parties are known, report these sources.	Recommend that this requirement is made optional (not mandatory) and/or only relevant to water stressed areas – as it is essentially covered in the response to 1a; and difficult to meaningfully compile and present at the company level. In addition, suggest that an illustrative example is provided in the guidance note.
2.2	When compiling the information specified in Disclosure 303-1, the reporting organization <b>should</b> :	
2.2.1	Explain how it has calculated water consumption, including any specific factors or assumptions	Important for transparency and benchmarking
2.2.2	Break down total water withdrawal by quality	Recommend that reporting withdrawal by <b>two</b> water quality categories is a mandatory requirement. Suggest that the withdrawal categories are aligned with the ICMM guidance (see p12), as: <ul style="list-style-type: none"> <li>a) <b>high quality</b> water – i.e. <i>freshwater</i> with high socio-environmental value and multiple beneficial uses, for example potable, agricultural, recreational, amenity (equivalent to MCA categories 1 and 2 combined); and</li> <li>b) <b>low quality</b> water – i.e. typically lower potential for multiple beneficial uses, for example industrial, wastewater, seawater (equivalent to MCA category 3).</li> </ul>
2.2.3	Report water withdrawal by source, and water consumption, at each facility in a water stressed area	No comment
2.2.4	Report the volume of water recycled and reused as a percentage of the total water withdrawal	Recommend that clearer definitions are provided for the terms “reuse” and “recycle” – see response in definitions table above.

No.	Reporting Requirements	ICMM Response
		Given the greater emphasis on water stressed areas, <b>recommend that disclosure of a single efficiency value (i.e. total reuse and recycling) is made a mandatory requirement both organisation wide and for <u>and</u> water stressed areas.</b> These metrics provide a very important insight into an organization's commitment to enhancing operational efficiency to reduce their withdrawals and minimise any associated impacts – especially in water stressed areas, where there may be competing demands for available freshwater resources.
<b>Disclosure 303-2: Water discharge</b>		
<b>2</b>	The reporting organization <b>shall</b> report the following information:	
<b>2a</b>	Total water discharge, in megaliters, with a breakdown by the following types of destination, if applicable: <ul style="list-style-type: none"> <li>i. Surface water, including water from wetlands, rivers, and lakes;</li> <li>ii. Groundwater;</li> <li>iii. Seawater/ brackish surface water;</li> <li>iv. Third-party water, including water to treatment plants and water to other organizations</li> </ul>	Reporting discharge according to the GRI definition will introduce inaccuracies in reporting and overinflate industry use – see response in definitions table above. Note error in the phrasing of the requirement (point i) – should be “surface water, including water <b>to</b> wetlands, rivers and lakes”.
<b>2b</b>	Total water discharge, with a breakdown by either: <ul style="list-style-type: none"> <li>i. level of treatment (no treatment, primary, secondary, tertiary); or</li> <li>ii. water quality</li> </ul>	Strongly support reporting discharge by water quality category as proposed, which is fundamental to characterising an organisation's performance. However, suggest that reporting by treatment level provides information of interest, but does not uniquely define performance (only management) nor associated impact. Further, disclosure of treatment level is not a reliable insight into the potential for impact, as there may be organizations who undertake extensive treatment to manage their discharge qualities (as would be disclosed here); versus others who have untreated, poor quality discharges with high environmental impacts (which wouldn't be disclosed here). <b>Strongly recommend that reporting by quality categories as proposed (see 2.2.2 above) is mandatory;</b> and reporting by treatment level is optional.

No.	Reporting Requirements	ICMM Response
2c	An explanation of how the organization determines its levels of treatment or defines quality levels, where applicable	No comment
2d	The substances of concern for which discharges are treated, including: <ul style="list-style-type: none"> <li>i. the discharge limits set for each substance;</li> <li>ii. an explanation of how the limits are set, or why no limits are set;</li> <li>iii. performance against the limits</li> </ul>	<p>As before, water is a local management issue where the potential for impact associated with a discharge of given quality depends largely on the local context. Thus, <b>very difficult to meaningfully compile and present at the organization level</b>; and potentially more relevant in areas where material impacts associated with poor quality discharges have been identified (as per 1.3.2).</p> <p><b>Strongly recommend reframing the question</b> – either:</p> <ul style="list-style-type: none"> <li>• to allow a <b>simple narrative response where material impacts have been identified</b> at the organizational level; or</li> <li>• as disclosure of any <b>discharge related violations or non-compliances with regularity limits</b>.</li> </ul>
2e	Standards, methodologies, and assumptions used	Recognise that this provides important context for transparency and benchmarking. However, recommend providing further guidance around the relevance and materiality of the information sought and reported, to reduce reporting burden and ensure useability of the responses.
2.3	When compiling the information specified in Disclosure 303-2, the reporting organization <b>should</b> :	
2.3.1	Where relevant, report separately the volume of water discharge that is used by other organizations	No comment
2.3.2	Explain how it identified substances of concern	Recommend removing, repetitive with requirements 2d and 2e.
<b>Disclosure 303-3: Spills and leaks</b>		
3	The reporting organization <b>shall</b> report the following information:	

No.	Reporting Requirements	ICMM Response
3a	Volume of each significant spill or leak, the location, and the substance	Recommend providing further clarification around the term “significant”
3b	Impact of each significant spill or leak on affected water bodies, environments, and local communities	Recommend providing further clarification around the term “significant”
3c	An explanation of how the organization is addressing the impacts	No comment
3d	Number and description of regulatory violations for significant spills and leaks	Recommend providing further clarification around the term “significant”
2.4	When compiling the information specified in Disclosure 303-3, the reporting organization <b>shall</b> describe how it has identified the threshold for reporting significant spills and leaks, where applicable	No comment
<b>Disclosure 303-4: Water impacts in the supply chain related to products and services</b>		
4	If water impacts are material in the supply chain, or due to its products and services, the reporting organization <b>shall</b> report the following information:	
4a	A description of water-related impacts in the supply chain or due to its products and services, and the approach for identifying them, including any tools or methodologies used	<p>Acknowledge the overall intent of these requirements. However, the guidance provided is not directly relevant for primary producers, including mining and metals companies – who are typically situated at the beginning of the value chain, with many thousands of product users and little potential for improved product design. <b>Strongly recommend that the guidance indicates that primary producers should focus disclosure on their direct operations.</b></p> <p><b>More generally, strongly recommend reconsideration of these reporting requirements</b> which are not considered to be effective for the following reasons.</p> <ul style="list-style-type: none"> <li>• There is significant potential for double accounting as many mining and metals sector organizations may have common suppliers. This is also true for all customers located across the value chain with common suppliers of mining and metals products.</li> </ul>
4b	A description of how the organization is addressing these impacts, including its engagement with significant suppliers or customers	



No.	Reporting Requirements	ICMM Response
		<ul style="list-style-type: none"> <li>The requirement for repeat reporting of water-related impacts, management strategies (and metrics) across all stages of the value chain has a high reporting burden for all reporting organisations; and is likely to yield inconsistent and incomplete disclosure with very limited value to external stakeholders.</li> </ul>
2.5	When compiling the information specified in Disclosure 303-4, the reporting organization <b>should</b> :	
2.5.1	Total water withdrawal and consumption by significant suppliers in water stressed areas	No comment
2.5.2	The percentage of water-discharging suppliers that have set minimum standards for the quality of their water discharge	To ensure materiality of response and reduce reporting burden, recommend rewording as “significant water-discharging suppliers”

## Section 4 – References

- CDP Water (2017) Guidance for companies reporting on water on behalf of investors & supply chain members 2017, [https://b8f65cb373b1b7b15feb-c70d8ead6ced550b4d987d7c03fcdd1d.ssl.cf3.rackcdn.com/cms/guidance\\_docs/pdfs/000/000/225/original/CDP-Water-Reporting-Guidance.pdf?1478544069](https://b8f65cb373b1b7b15feb-c70d8ead6ced550b4d987d7c03fcdd1d.ssl.cf3.rackcdn.com/cms/guidance_docs/pdfs/000/000/225/original/CDP-Water-Reporting-Guidance.pdf?1478544069)
- CEO Water Mandate (2014) Corporate Water Disclosure Guidelines, <https://ceowatermandate.org/files/Disclosure2014.pdf>
- GRI, GSSB (10 August 2017) Exposure draft of *GRI 303: Water and Effluents*, <https://www.globalreporting.org/standards/gri-standards-public-consultation/>
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- GRI Standards (2016) GRI 306: Effluents and Waste, <https://www.globalreporting.org/standards/gri-standards-download-center/>
- GRI Standards (2016) GRI Standards Glossary, <https://www.globalreporting.org/standards/gri-standards-download-center/>
- ICMM (2017) A practical guide to consistent water reporting, [https://www.icmm.com/website/publications/pdfs/water/170315\\_water-reporting-guidance\\_en.pdf](https://www.icmm.com/website/publications/pdfs/water/170315_water-reporting-guidance_en.pdf)
- MCA (2014) Water Accounting Framework for the Minerals Industry (v1.3), [http://www.minerals.org.au/file\\_upload/files/resources/water\\_accounting/WAF\\_UserGuide\\_v1.3\\_\(Jan\\_2014\).pdf](http://www.minerals.org.au/file_upload/files/resources/water_accounting/WAF_UserGuide_v1.3_(Jan_2014).pdf)