



Barbara Strozzilaan 336
1083 HN Amsterdam
The Netherlands
standards@globalreporting.org

Exposure draft of *GRI 303: Water and Effluents*

Public comments received via email

Date	5 March 2018
Description	<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 exposure draft of the revised Standard, <i>GRI 303: Water and Effluents</i>, was exposed for public comment from 20 December 2017 to 19 February 2018.</p> <p>This document includes the full set of public comments received via email during the second 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 Form; these comments are included in a separate Excel file, which can be downloaded on the GRI Standards website.</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 20 December 2017 to 19 February 2018).

Number	First name	Last name	Representation	Organization	Country	Region	Constituency	Page
1	Carol	Adams	Organizational	GRI Stakeholder Council	Australia	Oceania	Civil Society Organization	Page 3
2	Chris	McCombe	Organizational	ICMM	United Kingdom	Europe	Mediating Institution	Page 5
3	Dr. Prachi Ugle	Pimpalkhute	Organizational	Eco Endeavourers Network	India	Asia	Other	Page 15
4	Corinne	Unger	Personal		Australia	Oceania	Other	Page 18

1. Comments from Carol Adams (on behalf of GRI Stakeholder Council)

Stakeholder Council Feedback on the Revised Draft GRI 303 Water and Effluents

The Stakeholder Council considered the Revised Draft GRI 303 Water and Effluents during its web meetings on 23 January 2018 and invited further individual input to be submitted by email. A summary of feedback was compiled and circulated for further comment.

Through this process the Stakeholder Council provides the following input for consideration:

Question 1: Is it clear how to report on the revised Management approach disclosures?

The SC agrees that yes, this is clear.

Question 2: Is it clear how to calculate water recycling and reuse?

The SC agrees that yes, this is clear.

Question 3: Is it clear how to report substances of concern?

The SC agrees that yes, this is generally clear. The following suggestions were made to clarify some of the language in this section:

Line 396	While we can see that the term “substances of concern” is clarified in line 440, it may also be beneficial to explicitly define this term in the glossary.
Line 416	While we can see that the levels of water treatment are clarified in lines 461-467, it may also be beneficial to explicitly define these terms in the glossary.
Line 442	We understand that not all countries have regulations related to discharge consent. It may be beneficial to provide guidance to organizations who operate in countries where there is no such regulation.

Question 4: Is it clear how to calculate water consumption according to the revised definition and calculation method?

The SC agrees that yes, this is clear.

Question 5: Is Table I helpful for understanding how to present information on the requirements and recommendations in the Standard?

The SC agrees that yes, Table I is very useful and does an excellent job of clarifying what information must be reported. We feel that it will be a useful tool for investors to use in water risk assessments.

Question 6: Are the definitions clear?

The SC agrees that yes, this is clear.

Question 7: Other comments.

The SC would like to commend the GSSB on a thorough revision process. We feel that the summary of changes on pages 2-3 is clear and the changes are well justified. Specifically, we noted that the revisions in lines 392-395 will be very useful in guiding organizations in their reporting on sound water stewardship. We also feel that the revised standard will help organizations understand the downstream impacts of their water consumption. Finally, we believe the standard will help organizations report on their progress toward SDG 6 (clean water and sanitation).

Compiled by Jennifer Leitsch, Vice-Chair, Stakeholder Council

Reviewed by Carol Adams, Chair Stakeholder Council

2. Comments from Chris McCombe (on behalf of ICMM)

ICMM Response to Exposure Draft 2 of GRI 303: Water and Effluents (20 December 2017)

Table 1 – ICMM response to proposed definitions

Terms and Definitions	ICMM Response
<p>Brackish water – water containing dissolved salts at a concentration greater than that of <u>freshwater</u>, and significantly less than that of <u>seawater</u>.</p> <p>Note: This definition is based on United Nations Educational, Scientific and Cultural Organization (UNESCO) International Glossary of Hydrology.</p>	<p>The UNESCO definition is open to variable interpretation as it does not practically determine what characterises the limits between:</p> <ul style="list-style-type: none"> • freshwater and brackish water; and • brackish water and seawater – in a quality, not physical, sense. This is important for classifying brackish versus saline groundwater. <p>To promote consistency, recommend linking to the water quality categorisation process. Respondents should define the basis for categorization.</p> <p>Also see response to 1a (recommendation to define withdrawal source categories on a <u>physical only basis</u>).</p>
<p>Fresh surface water (also freshwater) – water with a low concentration of salts, or generally accepted as suitable for the production of potable water.</p> <p>Note: This definition comes from United Nations Educational, Scientific and Cultural Organization (UNESCO) International Glossary of Hydrology.</p>	<p>See response 1a (recommendation to define withdrawal source categories on a <u>physical only basis</u>). The term should therefore include “freshwater” only.</p> <p>To promote consistency, strongly recommend qualifying freshwater as $\leq 1,000$ mg/L TDS (WHO, 2011 Drinking water guidelines); and linked to water quality categories.</p>
<p>Seawater (also saltwater) – water in which the concentration of salts is relatively high (over 10,000 mg/L).</p> <p>Note: This definition is based on United Nations Educational, Scientific and Cultural Organization (UNESCO) International Glossary of Hydrology.</p>	<p>Definition not found in the UNESCO Hydrology Glossary cited.</p> <p>The current definition is confusing and does not appropriately allow for the classification of non-fresh (brackish, saline or hypersaline) groundwater.</p> <p>As per response to 1a - for reporting consistency and feasibility, strongly recommend defining all withdrawal source categories, including seawater, on a <u>physical only basis</u> (i.e. seawater includes water in oceans, seas and estuaries); and removing all quality aspects (including “saltwater”).</p> <p>Should this remain, clarification is required around exactly what is meant by a “concentration of salts”. Is this sodium and chloride, which is a measure of ocean salinity, and not directly appropriate for the classification of groundwater? Strongly recommend clarifying the limits provided, using consistent units (e.g. as Total Dissolved Solids (TDS in mg/L) – where a TDS value of 10,000 mg/L would be a commonly recognised threshold for saline water (seawater TDS is typically around 35,000 mg/L).</p>

Terms and Definitions	ICMM Response
<p>Water consumption – sum of all water that has been <u>withdrawn</u> and incorporated into products, produced crops or waste, evaporated, transpired, consumed by humans or livestock, polluted to the point of being unusable by other users, and therefore not released back to <u>surface water</u>, <u>groundwater</u>, or <u>third party</u> over the course of the reporting period.</p>	<p>Acknowledge and strongly support revised definition and calculation approach.</p>
<p>Water discharge – sum of <u>effluents</u>, used water, and unused water released to <u>surface water</u>, <u>groundwater</u>, or <u>third party</u> over the course of the reporting period.</p> <p>Note 1: Water can be released into the receiving waterbody either at a defined discharge point (point-source discharge) or dispersed over land in an undefined manner (non-point- source discharge).</p> <p>Note 2: Water discharge can be authorized (in accordance with discharge consent) or unauthorized (if discharge consent is exceeded).</p>	<p><u>1a) Interpretation of intent – see response to water withdrawal definition</u></p> <p>The intent of the corresponding withdrawal definition is unclear (see response). If the intent is to disclose:</p> <ul style="list-style-type: none"> the volume withdrawn for the intention of use – remove “unused water” from this definition; or the total water footprint. <p><u>1b) Potential implications for the mining and metals sector – see response to water withdrawal definition</u></p> <p>If the intent of the GRI definition is to report the total water footprint (withdrawal and discharge), it is likely that some member organizations will not be able to meet the GRI reporting requirement, nor have the organisational capacity to make the necessary changes in the short-term. Thus, to promote consistency across the sector and allow benchmarking, ICMM will recommend that, in the short-term, member companies only report “ICMM discharge” volumes in response to reporting requirements 2a-2d (i.e. discharge of water that has been withdrawn for the intention of use, excluding “ICMM diversion” discharge volumes). As able, additional information around diversion discharge volumes (and destinations) may be provided in the accompanying contextual narrative (2f). This discrepancy will be addressed during the next revision of the ICMM guidance and ICMM will work closely with GRI on addressing this in future revisions of sector specific or other guidance.</p> <p><u>2) Proposed clarification</u></p> <p>For clarity, strongly recommend removing, or revising the intent of, note 1. The concept of point-source and non-point-source discharges is relevant when considering the water quality impacts associated with low quality run-off. However, it is confusing in the context of water accounting, as it is not practical or relevant to account for volumes of unmanaged, run-off (i.e. non-point source discharges) associated with incidental (i.e. non-harvested or uncollected) rainfall – also see response to withdrawal definition around the inclusion of harvested rainfall.</p>
<p>Water recycling and reuse – act of processing used water and wastewater (treated or untreated) through another cycle before</p>	<p>See response to 2.2.5</p>

Terms and Definitions	ICMM Response
<p><u>discharge</u> to <u>surface water</u>, <u>groundwater</u>, or <u>third party</u> (in the same process, in a different process but within the same facility, or at another of the organization's facilities).</p>	
<p>Water stewardship – the use of fresh water that is socially equitable, environmentally sustainable and economically beneficial, achieved through a <u>stakeholder</u>-inclusive process that involves facility- and <u>catchment</u>-based actions. Good water stewards understand their own water use, catchment context and shared risk in terms of water governance, water balance, water quality and Important Water-Related Areas, then engage in meaningful individual and collective actions that benefit people and nature.</p> <ul style="list-style-type: none"> • Socially equitable water use recognizes and implements the human right to water and sanitation and helps ensure human well-being and equity. • Environmentally sustainable water use maintains or improves biodiversity and ecological and hydrological processes at the catchment level. • Economically beneficial water use contributes to long-term efficiency and development and poverty alleviation for water users, <u>local communities</u> and society at large • Water stewardship is intended to support and contribute to integrated water resource management by all actors. <p>Note: This definition is based on the Alliance for Water Stewardship (AWS) International Water Stewardship Standard, version 1.0.</p>	<p>The use of the term “fresh water” is misleading. The principles of water stewardship should apply to the holistic management of all water resources – and should not be limited to “the use of fresh water”. Strongly recommend that the definition be revised to encompass all water.</p> <p>For consistency and clarity, recommend simplifying the definition by removing all text after “Good water stewards...” (In 622), which provide a limited number of “soft” examples of stewardship actions rather than a clear definition of the term. Should this remain, strongly recommend revising the definition to also recognise individual or collective actions which reduce dependence on, and consumption of, fresh water resources – for example, through reuse and recycling; and/or the use of low quality and waste water. Also see response to 2.2.5.</p>
<p>Water stress – 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 is based on 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> <p>Note 3: Water stress in an area may be measured at <u>catchment</u> level at a minimum.</p> <p>Note: This definition comes from the CEO Water Mandate Corporate Water Disclosure Guidelines, 2014.</p>	<p>For clarity and simplicity, recommend removing notes 2 and 3.</p>

Terms and Definitions	ICMM Response
<p>Water withdrawal – sum of all water drawn from <u>surface water</u>, <u>groundwater</u>, or <u>third party</u> for any use over the course of the reporting period.</p>	<p><u>1a) Interpretation of intent</u></p> <p>The current definition is open to variable interpretation around the meaning of “for any use”, as either:</p> <ul style="list-style-type: none"> intended for “use” by the organization within its operational facilities; or “for any purpose”, which corresponds to the organization’s total water footprint <p>Should “any use” be the intent, the definition should specify it applies to the water withdrawn for the intention of use within the organization’s operational facilities (e.g. consumption). For reporting consistency, we also recommend clarifying by removing “unused” water from the corresponding discharge definition, (see also response to water discharge definition). Withdrawal for “any use” will be most feasible for mining operators and will enable those organizations to report on a consistent basis, meeting the requirements of the standard.</p> <p>Should it be intended that water withdrawal capture all water intended for use and actively managed by an organization (for “any purpose”) this should be clarified. However, the implications of this broader definition to mining (and potentially other sectors) will need to be considered.</p> <p><u>1b) Potential implications for the mining and metals sector</u></p> <p>It is noted that most sectors only access and manage water for the intention of use, in which case the above interpretations are essentially the same. This is an important distinction for the mining and metals sector, as many mining operations are required to actively manage (i.e. withdraw and directly discharge) significant volumes of water to enable safe working conditions without any intention to “use” the water in a traditional sense. For example, to dewater below watertable orebodies and/or to control storm-water. Furthermore, in some areas the magnitude of such volumes may dwarf the volumes of water withdrawn for the intention of use. In some cases operations may be forced to actively manage surplus water from major flooding events. Unlike ‘water intended for use’, these volumes can vary dramatically from year to year and are a function of both operational and environmental factors.</p> <p>Another complexity is in understanding the potential impacts of water that is actively ‘managed’ but not used. For example, water may be actively managed for environmental benefit or to offset water use by a third party may be beneficial to the management of a water resource.</p> <p>As illustrated above, a simple aggregation of water withdrawal with “the intention of use” and water “actively managed” would provide an inaccurate picture of potential water impacts and potentially diminish the utility of the GRI standard for benchmarking organizations. It is therefore recommended the definition be modified to clarify its intent; enable consistent and comparable reporting; and be feasible for reporting organizations to implement.</p>

Terms and Definitions	ICMM Response
	<p>ICMM has taken a pragmatic approach to this matter, an outline for which is provided below:</p> <p>To allow transparency around an organization's water practices and management, the ICMM water reporting guidance¹, based on the MCA WAF², accounts for these volumes as:</p> <ul style="list-style-type: none"> i. ICMM withdrawal – water drawn (by source category) for the intention of use; and ii. ICMM diversion – water drawn (by source category) and directly discharged (by destination), i.e. actively managed, to allow safe working conditions. <p>Collectively, these volumes (i.e. ICMM withdrawal plus ICMM diversion) correspond to the total water footprint. However, <u>for reporting feasibility and quality reasons</u>, ICMM only requires members to report "ICMM withdrawal" volumes at the minimum disclosure level. This is due to the additional capacity required for many companies to report on diversions and the complexity of reporting diversions in the context of their potential impacts. However, it is noted that several member companies do report diversions in their CSR reports.</p> <p>In terms of feasibility of reporting on either footprint or operational use it should be considered that ICMM members companies are currently working to comply with the ICMM minimum disclosure standard (i.e in line with reporting on water drawn for the intension of use) by November 2018, which in many cases is requiring significant organisational change.</p> <p>Hence if the intent of the GRI definition is to report the total water footprint, it is likely that some member organizations and other mining companies operating in the sector will not be able to meet the GRI reporting requirement, nor have the organisational capacity to make the necessary changes in the short-term.</p> <p>To address this issue and to promote consistency across the sector and allow benchmarking, ICMM would recommend that, in the short-term, member companies only report "ICMM withdrawal" volumes in response to reporting requirements 1a and 1b; and as able, provide additional information around diversion withdrawal volumes (and source categories) in the accompanying contextual narrative (1c). This issue will be addressed during the next revision of the ICMM guidance, the outcomes of which we would work with GRI on to encourage consideration in future revisions of any GRI sector specific or other relevant guidance.</p> <p>Lastly, it is important to note that while "diversions" as defined above are a known complexity for mining, this is in part due to the maturity of industry's water accounting approach. There are likely to be parallels in other sectors that are not yet understood. Given GRI's focus on multi-sector water use and understanding potential impacts, the distinction between water withdrawal for use and diversions will be important for cross sectoral comparison.</p> <p><u>2) Inclusion of "harvested" rainfall</u></p> <p>For reporting consistency, strongly recommend that clarity is provided that rainfall is only included as a surface water component where "harvested or collected with the intention to use and comprises a material component of the organization's water balance".</p>

Table 2 – ICMM response to proposed reporting requirements

No.	Reporting Requirement / Recommendation (*)	ICMM Response
1. Management Approach Disclosures GRI Note: the management disclosures in this section focus on how an organization identifies and manages its water-related impacts. This section is therefore designed to supplement, and not replace, the content in <i>GRI 103: Management Approach</i> .		
	Impacts of water discharge	
1.2.5	<p>A description of any minimum standards it has set for the quality of discharges, and how these minimum standards were determined, including:</p> <p>1.2.5.1 how it determined standards for facilities operating in locations with no local discharge requirements;</p> <p>1.2.5.2 any internationally developed water quality standards or guidelines;</p> <p>1.2.5.3 any sector-specific standards considered; whether it considered the profile of the receiving waterbody.</p>	<p>Strongly recommend consolidating or clarifying the difference in intent between this reporting recommendation and clause 303-2e (i-iii) – as potential overlap appears to remain for the following reason.</p> <p>This clause (1.2.5) would appear to require a narrative response around how minimum standards for discharge quality are set. Whereas clause 303-2e, would appear to require a narrative around how priority substances are defined and appropriate discharge limits are set. However, in most circumstances, minimum standards for discharge quality are based around the identification and management of priority substances and are set in line with the regional context.</p> <p>Suggest consolidation as:</p> <p>1.2.5 A description of any minimum standards it has set for the quality of discharges, and how these minimum standards were determined, including:</p> <p>1.2.5.1 how priority substances of concern, which require specific discharge management and/treatment, are identified and used to define discharge limits</p> <p>1.2.5.2 how discharge standards are determined for facilities operating in locations with no local discharge requirements;</p> <p>1.2.5.3 any international standards, guidelines, authoritative lists or criteria used – including sector-specific material;</p> <p>1.2.5.4 whether the profile of the receiving waterbody is considered</p> <p>In addition, for clarity, recommend that accompanying guidance clearly state that the response should be an overview narrative which covers the entire organization (i.e. does not require site/location specific information).</p>
	Water-related impacts in its supply chain or due to its products or services	
1.3.1*	Provide an overview of where and how across its value chain water is withdrawn, consumed, and discharged	<p>Acknowledge the intent of this reporting recommendation, also that it is non-mandatory. However, note that this reporting recommendation is very difficult to practically achieve for primary producers - especially the mining and metals sectors, as it is not feasible to summarise how water is withdrawn, consumed and discharged for all products and services which incorporate primary metals. It should also be noted that many mining products are re-used and recycled, making accurate reporting very difficult.</p>

No.	Reporting Requirement / Recommendation (*)	ICMM Response
1.3.2*	Identify catchments where it causes material water-related impacts	<p>Recommend clarifying if the intent of this reporting recommendation is direct operations only, the value chain, or at the discretion of the reporting organisation. If the value chain, same response as 1.3.1 – it is not practical to identify all catchments with material water-related impacts associated with products or services which incorporate primary metals.</p> <p>Further, recommend that the guidance states that the assessment should be made at a catchment scale appropriate to the context of water management and reporting. As, for example, it is noted that the Colorado River Basin drains a significant amount of the western third of the USA, which would not be an appropriate scale.</p>
Disclosure 303-1: Water withdrawal		
1a	<p>Total water withdrawal from all areas in megaliters, with a breakdown by the following sources, if applicable:</p> <ul style="list-style-type: none"> i. Fresh surface water; ii. Groundwater; iii. Seawater/brackish water; iv. Produced/process water; v. Third-party water. 	<p><u>1) Disclosure intent - see response to water withdrawal definition</u></p> <p><u>2) Source categories</u></p> <p>The withdrawal categories proposed are open to variable interpretation for the following reasons.</p> <ul style="list-style-type: none"> • The categories do not clearly accommodate non-fresh groundwater (i.e. brackish, saline or hypersaline). • With the introduction of "fresh" surface water, the basis of the categorisation confuses physical and quality distinctions, where the latter may be more clearly accommodated by reporting with water quality categories (e.g. as 2.2.1). <p>For reporting consistency and feasibility, strongly recommend definition of withdrawal source categories (and corresponding discharge destinations) on a physical only basis (as below) – where salinity (which is only one measure of a water's suitability to meet human and livestock demands) is disclosed by reporting water quality (as 2.2.1).</p> <ul style="list-style-type: none"> i. Surface water; ii. Groundwater; iii. Seawater iv. Produced/process water; v. Third-party water.
1b	<p>Total water withdrawal from areas with water-stress in megaliters, with a breakdown by the following sources, if applicable:</p> <ul style="list-style-type: none"> i. Fresh surface water; ii. Groundwater; iii. Seawater/brackish water; iv. Produced/process water; 	<p><u>1) Disclosure intent - see response to water withdrawal definition</u></p> <p><u>2) Source categories – see response to 1a</u></p>

No.	Reporting Requirement / Recommendation (*)	ICMM Response
	v. Third-party water.	
2.1.1	If known, report the original withdrawal sources of water supplied by a third party by withdrawal source categories in Disclosure 303-1 in megaliters	<p>For reporting achievability, and to improve the quality and completeness of responses, recommend that this is made a reporting recommendation only and/or only relevant to water stressed areas for the following reasons:</p> <ol style="list-style-type: none"> 1. Not practical (or meaningful) to report detail of third party supply sources at the company level. If material to understanding overall impact, would appear in the value chain narrative (1.2.6, 1.2.7 and 1.3.1), as third-party water suppliers are part of an organization's supply chain. 2. Potential for double counting as a third-party water supplier (e.g. municipal suppliers or private utilities) will supply multiple organizations. <p>In addition, the requirement as currently posed, may generate misleading responses in situations where the reporting organization takes low quality (e.g. waste water) from a third-party organization (to reduce their freshwater demand), but the original withdrawal source was high quality surface water or groundwater. Should this remain a reporting requirement, strongly recommend that this discrepancy is resolved or addressed in the accompanying guidance.</p>
2.2.1*	Break down total water withdrawal from all areas by quality	<p>As per previous response, strongly support the proposed approach to report water quality by appropriate categories. However, the MCA WAF example provided shows three reporting categories for water quality which may be problematic to achieve for reporting organizations that do not have mature water management systems and/or prior experience of reporting water quality. Hence for general reporting achievability, and to improve the quality and completeness of responses, strongly recommend allowing a minimum of two water quality reporting categories (as below), with allowance for three categories where technically feasible and/or materially beneficial.</p> <ol style="list-style-type: none"> 1. high quality water – i.e. <i>freshwater</i> with high socio-environmental value and multiple beneficial uses, for example potable, agricultural, recreational, amenity (equivalent to MCA WAF categories 1); and 2. low quality water – i.e. typically lower potential for multiple beneficial uses, for example industrial, wastewater, seawater (equivalent to MCA WAF categories 2-3).
2.2.5*	Report percentage of water recycled and reused, using the following formula provided (see end of table).	<p>Given the focus on the stewardship of freshwater resources and areas of water stress, recommend that reporting of percentage water reuse and recycle is a mandatory requirement for both (1) areas of water stress and (2) the organisation/company as a whole. 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.</p> <p>Strongly recommend that this approach is provided as guidance, and that there is flexibility for reporting organizations to use other recognised sector-specific approaches if more suitable for their operational activities, provided that the approach used is explained. This would also ensure the data provided are more meaningful to users of the standard.</p>

No.	Reporting Requirement / Recommendation (*)	ICMM Response
Disclosure 303-2: Water discharge		
2a	Total water discharge to all areas in megaliters, with a breakdown by the following types of destination, if applicable: i. Fresh surface water; ii. Groundwater; iii. Seawater/brackish water; iv. Third-party water.	1) Disclosure intent - see responses to water withdrawal and discharge definitions 2) Source categories – see response to 1a
2b	Total water discharge to areas with water stress in megaliters.	See responses to water withdrawal and discharge definitions around disclosure intent
2c	Total water discharge to all areas in megaliters, with a breakdown by water quality.	See response to 2.2.1
2e	Priority substances of concern for which discharges are treated, including: i. how priority substances of concern were defined, and any international standard, authoritative list, or criteria used; ii. the approach for setting discharge limits for priority substances of concern; iii. the number of incidents of non-compliance with discharge limits.	See response to 1.2.5 Suggest consolidation as: 2e The number of <u>exceedances</u> of relevant water quality discharge limits.
2.3.4	Describe its impacts from surface runoff, and how they are addressed, if applicable.	To broaden and improve clarity, recommend removing “value chain” from the accompanying guidance (In 452) and rewording as: “Run-off may carry high pollutant and nutrient loads which may negatively impact the quality and/or function of local waterbodies, including eutrophication”.
2.4.1*	Total water discharge by level of treatment (no treatment, primary, secondary, tertiary), and how these were determined	The accompanying guidance (In 455 – 469) states that the “level of treatment may provide insight into the effort an organization is taking to improve the quality of its water discharge”. This is only true to a point. It is the sensitivity of the receiving waterbody or third party requirements that determine an appropriate level of treatment for a given discharge. This is entirely dependent on the local environmental context rather than the organization's level of effort – i.e. it is operational activities with high polluting potential, situated in highly sensitive areas which require a high level of effort to manage and mitigate potential impacts. Recommend that this is made clear in the accompanying guidance.

No.	Reporting Requirement / Recommendation (*)	ICMM Response
		<p>In addition, for clarity, recommend rewording:</p> <ul style="list-style-type: none"> Ln 468 as: "An organization may withdraw and discharge water of a quality which does not require treatment." Ln 471 as: "Quantifying the volumes of low quality water discharged..."
Disclosure 303-3: Water consumption		
2.5.1	Where relevant, report change in storage in megaliters;	Acknowledge and strongly support inclusion of change in storage (i.e. ΔS).
2.6.2*	Total water consumption by suppliers causing material water-related impacts in areas with water stress.	<p>Acknowledge the intent of this reporting recommendation, also that it is non-mandatory. However, caution against the recommendation to report quantitative metrics (volumes) as currently proposed for the following reasons.</p> <ul style="list-style-type: none"> It is likely to take significant effort to compile, and be very difficult to verify these data. The recommendation is likely to produce inconsistent data, as the volumes reported will be based on the subjective assessment of both "material water-related impact" and "areas of water stress". Inconsistent volumes reported may potentially be aggregated with those of the reporting organisation (as disclosed in 3b) by external stakeholders to provide a misleading view, which may be erroneously used for benchmarking purposes. 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.
Table 1 and References		
Ln 519-520	Of this total, if known (clause 2.1.2)	Should be "(clause 2.1.1)"
Ln 523-525	Quality categories	As 2.2.1 and 2c, recommend revising to show a minimum of two water quality categories, high and low – with the option for third self-defined (and named) category, where feasible and materially beneficial.
Ref 6	Mineral Council of Australia (MCA) <i>Water Accounting Framework for the Minerals Industry</i> , User Guide v1.3, 2014	Recommend that the ICMM guidance ¹ is also referenced if allowance is made for a minimum of two water quality categories (see response to 2.2.1).

References

¹ ICMM (2017) A practical guide to consistent water reporting, https://www.icmm.com/website/publications/pdfs/water/170315_water-reporting-guidance_en.pdf

² 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)

3. Comments from Dr. Prachi Ugle Pimpalkhute (on behalf of Eco Endeavourers Network)



Eco Endeavourers Network
Striving for the planet in peril

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

13/02/2018
Page 1

*Water – The future Asset
Let's use it sensibly*

Eco Endeavourers Network
Striving for the planet in peril

Vision

To create awareness, carry out research, disseminate knowledge and capacity building as a team in the domain of Environment, sustainability, climate change and energy and to promote environmental friendly and sustainable policies and channelize the outcomes through this thought leadership platform.

Our Team

Dr. Prachi Ugle Pimpalkhute,
Founder and citizen outreach,
Eco Endeavourers Network

Mr. Sachin Pimpalkhute,
Co-Founder,
Eco Endeavourers Network

Contact us: ecoendeavourers@gmail.com

Review Comments and Feedback by
Dr. Prachi Ugle Pimpalkhute, Founder,
Eco Endeavourers Network

At the outset, Eco Endeavourers Network sincerely congratulates the Global Reporting Initiative Organization for its endeavour of coming up with revised GRI 303: Water and effluents draft. With the first public comments, changes and revision being set in and open for second comments and feedback, Eco Endeavourers Network would leverage this opportunity and participate in the public comment and feedback for the revised draft of GRI 303: Water and Effluents.

This opportunity would enable us to learn, review and upgrade our understanding of GRI Water standards revision. Have knowhow of the new approach, strategy, what is to be aligned while applying calculation method for water consumption, what priority substances and pollutants to report, what requirements to be added and report on water discharge to areas with water stress, to carry the focus on impacts in areas with water stress from withdrawal to consumption and discharge.

I sincerely thank GRI for providing a platform for public comments and feedback.

The first revised draft standards, key changes after first round of open for public comments and feedback incorporated are as follows. Eco Endeavourers Network would like to place its suggestions and comments in the key changes revised points given.

- **GRI:** Separated water consumption disclosures from water withdrawal disclosures, to improve the feasibility of reporting in full on either one of these disclosures.
- **EEN Comment:** Why indirect water consumption from suppliers not being considered for calculation purpose? As mentioned in revised draft when water consumption cannot be measured directly, it can typically be calculated as total water withdrawal minus the sum of total water discharge and change in water storage then why when with regard to water stress areas, suppliers play a major role the criteria is ignored.
- **GRI:** Re-allocated contents of Disclosure 303-4 (Impacts in the supply chain and related to products and services) throughout the Standard, to better align with the structure of the GRI Standards.
- **EEN Comment:** Why section on water risks, impacts and opportunities, communication to its stakeholders not included?
- **GRI:** Removed Disclosure 303-3 (Spills and leaks) from the Standard, as it is not relevant exclusively to the topic of water.
- **EEN Comment:** If effluents are included in the title name as water and effluents, why are accidental leaks not included?
- **GRI:** Aligned the definition and calculation method for water consumption, to allow for a valid calculation of water consumption.
- **EEN Comment:** Commendable alignment
- **GRI:** Added a requirement to report water discharge to areas with water stress, to carry the focus on impacts in areas with water stress from withdrawal to consumption and discharge.
- **EEN Comment:** Commendable addition of requirement to report water discharge to areas with water stress.
- **GRI:** Specified that only priority substances of concern need to be reported, and changed the disclosure to request narrative descriptions of how priority substances of concern are managed.
- **EEN Comment:** Commendable change.

- **GRI:** Revised existing definitions and added new ones, as well as clarified guidance throughout the Standard - including the table to report data on the full set of disclosures, supply chain terminology, and methods for assessing areas with water stress
- **EEN Comment:** Commendable change

4. Comments from Corinne Unger (personal feedback)

dear sir/madam

I cannot find a place on the form to address the following so I will direct them to you for your advice.

Q How does the GRI address water impacts and interactions associated with mine closure?

To use a scenario, most coal mines and open cut metalliferous mines in Australia (and perhaps also overseas) will leave a water filled (or partially filled) final void (open cut pit). Most of these will have adverse water quality - saline for coal mines and Acid and Metalliferous Drainage for metalliferous mines (and some coal mines).

So this represents an interaction with groundwater - influencing both groundwater availability during rebound and groundwater quality where pit lake water interacts with surrounding/connected groundwater system. Depending on the pit limnology and other interactions the pit lake water quality may a) be treated as it fills to ameliorate negative consequences or b) be left to its own devices over a long period of time for filling which may, depending upon local conditions and geology b1) stabilise with limited impacts to ground and surface water or b2) stabilise with long term impacts or b3) get worse over time due to weathering interactions with pit walls and evapo-concentration (increasing salinity).

Additionally there could be surface water interactions via a) surface drainage inflows and possibly also 'river capture' b) surface drainage outflows and of the outflows you could have b1) minor alteration to surface flows (hydrology) due to void interactions and b2) major alteration of surface flows due to having to fill the void before overflow and could also have b3) benign water quality OR b4) adverse surface water quality discharged (passively or actively - depending upon closure and post-closure management.

There is a further question i have on abandoned/legacy mines which probably go under the radar as you are hoping that companies want to report on water under the GRI standards. But what about governments and other entities which are left with those mining legacies? how do they interact with the standard. Mostly in Australia, the governments apply an ad hoc approach to managing legacies or none, while other jurisdictions (eg BC Canada) are more strategic and have well planned risk based approaches.

I will attach i) & ii) a paper (and book chapter) on the abandoned mines Unger et al iii) a paper on water and closure by Byrne (this latter paper will be updated and published in 2018 in an AusIMM publication we are producing), iv) & v) a paper by Laurence (from a Mine Closure conf and one published journal) which highlights AMD as the primary environmental legacy from closed mines in Australia and vi) the legacy mine roundtable forum which identifies the gaps

inadequacies of current legacy site mgmt (2008 PMA/ICMM/IUCN) and makes recommendations for the future (which have not been implemented)

For mine closure water related regulatory inadequacies you can watch the space of the Senate inquiry into water. there are few if any clear standards for WQ associated with closure when the department regulating closure is only interested in mine rehabilitation which focusses on terrestrial vegetation. By February there may be submissions uploaded to this site. I have made a submission which will become accessible once reviewed by the committee;

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/WaterUseGovernance

so in summary I recommend the GRI include a category for **mine closure** - which defines how water interacts with the surrounding surface and ground water systems in terms of both quality and quantity. The way the GRI works is only recording activity in the current year (is that right?) so if a mine is still operating you wont get this data. If it is undergoing decommissioning and closure and you seek these data then you probably wont receive them, because the GRI standard (draft currently) is more heavily leaning toward water take and use and recycling/operational aspects and the term discharge implies active involvement (whereas some discharges are passive and without intervention). Also regulatory requirements are unclear so a 'compliance' focus will often not pick up on these aspects early in the process, if at all, in Australian jurisdictions. Those other water aspects covered by the draft water standard are also fundamentally important but do not address the forgotten legacy of water during and after mine closure.

This needs to be included when you update the water standard for the GRI.