



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

Basis for Conclusions for *GRI 403: Occupational Health and Safety 2018*

Summary of Public Comments on the Exposure Draft of the Standard, and GSSB Responses

Date 28 June 2018

Description This document sets out the significant issues raised by respondents on the [exposure draft of GRI 403: Occupational Health and Safety \(GRI 403\)](#), during the consultation period from 10 August to 9 October 2017. It incorporates public comments received via the [GRI Standards Consultation Platform](#) and official feedback submissions received via email, as well as input from stakeholder workshops carried out in select regions.

All individual comments received, together with an analysis of the significant issues raised, were first provided to the Project Working Group (PWG) for review and discussion, and their recommendations were later shared with the Global Sustainability Standards Board (GSSB) for review and approval. This document provides a summary of how the GSSB has responded to the significant issues raised during the public comment period. The full set of individual comments received via the consultation platform and via email are available to download from the [GSSB website](#).

The final *GRI 403: Occupational Health and Safety 2018* Standard published on 28 June 2018 can be downloaded [here](#).

Contents

About this document.....	3
Introduction.....	3
Background and objectives for the revision of GRI 403.....	3
Scope of the public consultation.....	4
Overview of official public comment submissions.....	4
Stakeholder workshops.....	5
Basis for Conclusions.....	6
General themes.....	6
Scope of workers.....	6
Additional content suggested for inclusion.....	7
Themes by disclosure.....	7
Management approach disclosures.....	7
Disclosure 403-1 Workers covered by an occupational health and safety management system...	8
Disclosure 403-2 Work-related injuries.....	8
Disclosure 403-3 Work-related illnesses.....	10
Disclosure 403-4 Workers' access to occupational health services.....	11
Disclosure 403-5 Worker health promotion.....	11
Annexes.....	12
1. Overview of questionnaire questions.....	12
2. Overview of respondents.....	13
3. Public comment submissions by representation, constituency, and region.....	16
4. Full list of Stakeholder Workshops.....	17

About this document

This document sets out the significant issues raised by respondents on the [exposure draft of GRI 403: Occupational Health and Safety](#) (hereafter *GRI 403*), during the public comment period, which ran between 10 August and 9 October 2017. It summarizes:

- comments received through the GRI Standards Consultation Platform (including questionnaire responses as well as detailed comments on the exposure draft);
- official feedback submissions received directly via email;
- feedback received from seven [stakeholder workshops](#) held during this period.

All individual comments received, together with an analysis of the significant issues raised, were first provided to the Project Working Group (PWG) for review and discussion, and their recommendations were later shared with the Global Sustainability Standards Board (GSSB) for review and approval. This document provides a summary of how the GSSB has responded to the significant issues raised during the public comment period.

The full set of individual comments received via the consultation platform and via email are available to download from the [GSSB website](#).

Introduction

Background and objectives for the revision of GRI 403

The proposal for the review of *GRI 403* was approved in October 2016 by the Global Sustainability Standards Board (GSSB), GRI's independent standard-setting body. The primary objective of this project was to review the content of *GRI 403* in order to represent and align with internationally-agreed best practice and recent developments in occupational health and safety management and reporting. Key references for revising the content included intergovernmental authoritative instruments, such as ILO Conventions, and other relevant standards and developments.

The revision of *GRI 403* was carried out in line with the GSSB's [Due Process Protocol](#). In accordance with this protocol, a multi-stakeholder PWG was formed to develop content for the review of *GRI 403*.

The following specific objectives were established by the GSSB when commencing the revision of the Standard, and were considered throughout the project:

- revising, and where needed, expanding on the existing *Background context* information within *GRI 403*;
- reviewing the existing [management approach disclosures](#) section within *GRI 403*, including:
 - revising the existing content;
 - where appropriate, developing new requirements, recommendations, and/or guidance;

- ensuring the revised management approach disclosures are compatible for organizations to use together with [GRI 103: Management Approach](#);
- reviewing the existing [topic-specific disclosures](#) for occupational health and safety (along with their related reporting requirements, recommendations, and/or guidance) including:
 - revising the existing content;
 - where appropriate, developing new disclosures, requirements, recommendations, and/or guidance in order to address areas not currently covered;
- revising and updating the existing *References* related to occupational health and safety;
- revising relevant definitions in the GRI Standards Glossary and, where applicable, developing new ones.

Scope of the public consultation

The exposure draft of *GRI 403* was open for public comment from 10 August to 9 October 2017. Respondents were asked to provide feedback on the feasibility of reporting against the proposed disclosures, their meaningfulness for communicating an organization's impacts on the health and safety of workers, and their completeness and clarity, as well as to provide feedback on specific content-related questions.

During this consultation period, the GSSB asked for feedback on the following specific areas:

- Clarity of the scope of workers covered in the Standard.
- Relevance of the management approach disclosures for occupational health and safety.
- Clarity of how to report on high-potential incidents.
- Feasibility of reporting work-related illnesses for workers who are not employees.

Any comments relating to areas out of scope for the revision of *GRI 403* (such as requests to develop sector guidance) will be considered by the GSSB separately to help inform future work priorities.

Overview of official public comment submissions

Stakeholders were able to give feedback on the exposure draft via the GRI Standards Consultation Platform (hereafter Consultation Platform), and/or directly via email.

GRI Standards Consultation Platform

The Consultation Platform was the main channel for stakeholders to access, review, and comment on the exposure draft. The Consultation Platform included a short questionnaire (see [Annex I](#) for an overview of the questions) and the exposure draft with the possibility to leave detailed comments directly on the PDF document.

Feedback via email

Although stakeholders were encouraged to utilize the Consultation Platform wherever possible, respondents who wanted to provide additional feedback on the exposure draft, or an official letter or statement, were able to submit this via email to standards@globalreporting.org or

ohs@globalreporting.org. This feedback was reviewed and analyzed along with the comments received through the Consultation Platform.

Total participation during the public comment period

In total, 55 individuals and organizations submitted feedback on the exposure draft.

48 submissions were received via the Consultation Platform, from individuals and organizations across 21 countries. Of these, 37 were submissions on behalf of an organization or groups of organizations (such as an industry association or trade group), and 11 were personal submissions.

10 individuals or organizations submitted feedback via email; three of these respondents also submitted comments through the Consultation Platform. Out of the remaining seven email submissions, six were on behalf of an organization or groups of organizations, and one was a personal submission.

For more detail, see the following:

- The full set of individual comments received via the online Consultation Platform and via email, available to download from the [GSSB website](#).
- [Annex 2](#) for an overview of respondents who provided feedback via the Consultation Platform and via email.
- [Annex 3](#) for a breakdown of public comment submissions by representation, region, and constituency.

Stakeholder workshops

As part of the public consultation process, the GSSB and GRI Standards Division also carried out seven in-person stakeholder workshops between September and October 2017. See [Annex 4](#) for the list of workshops by location. The workshops were stand-alone events and were addressed to a limited number of participants in order to encourage robust dialogue.

These workshops were designed to give participants an overview of the changes in *GRI 403*, and to solicit their feedback on specific areas of the exposure draft through small group work and discussion.

Each small group was provided with excerpts from the exposure draft and asked to answer specific questions relating to the relevance, feasibility, and clarity of the contents. Each group was asked to record their feedback for discussion with the full group. Each participant was also given an individual response sheet where they could leave additional comments, concerns, or suggestions.

Basis for Conclusions

In line with the [Due Process Protocol](#), this section summarizes the significant issues raised by respondents during the public comment period, and the GSSB's responses to these issues. Every comment received was first reviewed individually by the GRI Standards Division to identify significant issues. All individual comments received, together with an analysis of the significant issues, were then provided to the PWG for review and discussion, and their recommendations were shared with the GSSB in turn for review and approval.

The significant issues are organized into the following sections:

- General themes
- Themes by disclosure

General themes

Scope of workers

a) Scope of workers unclear

Many respondents requested clarifications on the subset of workers to be used when reporting the disclosures in *GRI 403*, such as the distinction between 'employee', 'worker', 'contractor', and 'supplier'. Respondents also requested examples of the types of worker to be included and the explicit inclusion of certain types of worker (e.g., temporary, agency, cross border workers).

GSSB response: The section on scope of 'workers' in the Standard has been clarified and a table with examples has been developed as guidance. Explanations about control of work and workplace (previously included in the list of defined terms) have been revised and included in this section. Additional examples of types of worker, such as agency workers, have been included, although it has been clarified that the worker type does not determine whether the worker is to be included by the organization in its reported data.

b) Not feasible to report data for workers who are not employees, including cases of shared control

Many respondents mentioned that it is difficult to report data for workers who are not employees. The scope of 'workers' was considered too broad and not representative of an organization's sphere of influence, since it includes cases of shared control of work or workplace and temporary workers. Respondents indicated it would be particularly challenging to report the following required data for these workers: recordable work-related injuries and illnesses, and the number of hours worked.

GSSB response: The feasibility of reporting data for workers who are not employees was evaluated, with the conclusion that if the organization has some degree of control, it should be possible to obtain these data (i.e., if the organization controls the work or the workplace, or shares control with one or more organizations, there will normally be a contractual obligation through which the organization can require the reporting of work-related injuries and ill health, and the number of hours worked). Thus, the scope of workers and the related requirements have been maintained. Additional clarifications and examples have been provided, such as the following:

- When the reporting organization does not have data available for all the workers specified in a disclosure, it is required to identify the types of worker excluded and explain the reasons for this - all topic-specific disclosures include the requirement to report 'whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded'.

- When the organization cannot directly calculate or estimate the number of hours worked (e.g., because the workers performed non-routine work during an emergency situation, or because the performed work was not paid for by the hour), it is required to provide a reason for this omission as set out in GRI 101: Foundation.
- In situations where an organization might not be able to collect or publicly disclose data on work-related ill health, for example due to privacy regulations, it is required to provide a reason for this omission as set out in GRI 101: Foundation.

Additional content suggested for inclusion

Some respondents stated that the exposure draft did not cover leading indicators sufficiently, and suggested some indicators for inclusion, such as the frequency of health and safety inspections or audits.

Additionally, a few respondents suggested the inclusion of certain topics within the Standard, such as mental health, gender, nutrition, road safety, commuting, public safety, return-to-work programs, governance, and non-compliance with regulations.

GSSB response: It has been clarified that leading indicators are often unique and tailored to a specific organization, and therefore, no additional leading indicators have been added as requirements within the Standard. However, additional examples of leading indicators have been included in the guidance for clause 1.3.2 (clause 1.2 in the final Standard).

The disclosures and definitions have been revised to clarify how to report on some of the suggested topics. The following are some examples:

- Clarification has been provided that commuting incidents are not included except in the case where the transport has been organized by the organization; nevertheless, the organization can report these incidents separately.
- Clarification has been provided that injuries and cases of ill health involving members of the public as a result of a work-related incident are not included; nevertheless, the organization can report these separately.
- The recommendations to provide a breakdown of data on work-related injuries and ill health in cases where reported numbers are significantly higher for certain worker demographics have been amended, citing the following criteria as examples: sex, gender, migrant status, age, worker type.
- Guidance for reporting on mental illnesses has been included, and examples of mental illnesses and psychosocial hazards have been provided.

Themes by disclosure

Management approach disclosures

a) Management system standards

One respondent suggested that an organization might choose to follow all or part of one, or many, standards in developing its occupational health and safety management system, and that the disclosures should be amended accordingly.

GSSB response: Clause 1.2.1 (Disclosure 403-1-a in the final Standard) has been revised to require the organization to report 'a statement of whether an occupational health and safety management system has been implemented, including whether:

- the system has been implemented because of legal requirements and, if so, a list of the requirements;

- the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines.’

Disclosure 403-1 Workers covered by an occupational health and safety management system

a) Recognized standards/guidelines

One respondent suggested that Disclosure 403-1 focuses on management systems that are based on nationally or internationally recognized standards or guidelines, in order to produce better benchmarks, consistent with global safety management systems and techniques.

GSSB response: Disclosure 403-1 (403-8 in the final Standard) has been revised to focus on occupational health and safety management systems based on legal requirements and/or recognized standards/guidelines, as reported in the Management approach disclosures section (under Disclosure 403-1 in the final Standard).

b) Basis for reporting the coverage of the management system

One respondent suggested that Disclosure 403-1 require reporting of the percentage of sites covered by the management system instead of the percentage of workers, as the latter may be difficult to implement since it is the sites or organizations that are accredited/certified, and not people.

GSSB response: Given the focus of the Standard to understand the organization’s impacts on the health and safety of workers, Disclosure 403-1 (403-8 in the final Standard) continues to use ‘workers’ as base measurement. The percentage of sites covered might not account for large groups of workers, for example if they are all working in just a few of many operation sites. However, the guidance has been expanded to explain that organizations can additionally report the number and percentage of sites covered by the management system if they wish to do so.

Disclosure 403-2 Work-related injuries

a) Reporting on impairments

Some respondents asked for clarification on whether the term ‘impairment’ would include both temporary and permanent impairments, and requested examples. A couple of respondents did not support the use of ‘impairment’ as a severity criterion, and suggested including the reporting of lost-day rate, absentee rate, and injury severity rate instead. It was also suggested to separate the rates of fatal and non-fatal impairments.

GSSB response: The use of ‘impairment’ as a criterion for determining the severity of a work-related injury has been replaced with the concept of ‘recovery time’. The term ‘fatal and non-fatal impairments’ has in turn been replaced with ‘high-consequence work-related injuries’. A high-consequence work-related injury has been defined as a ‘work-related injury that results in a fatality or in an injury from which the worker cannot, does not, or is not expected to recover fully to pre-injury health status within 6 months’. Additional guidance and examples have also been added.

The rates of fatal and non-fatal impairments have been separated. This disclosure now requires the ‘number and rate of fatalities as a result of work-related injury’ and the ‘number and rate of high-consequence work-related injuries (excluding fatalities)’.

Metrics such as ‘lost-day rate’ or ‘absentee rate’ have not been included as requirements, given that these are indicators of the loss of productivity for an organization as a result of a work-related injury; they do not necessarily indicate the extent of harm suffered by workers, which is the focus of this Standard. It has also been explained that organizations can additionally report these metrics if they wish to do so.

b) Reporting on high-potential incidents

Many respondents found it challenging to understand the concept of ‘high-potential incidents’, and suggested including more guidance and examples. They also considered the concept to be subjective, as it varies across different organizations and depends on the industry or sector in which an organization operates, thus undermining comparability, and penalizing the most mature organizations with better reporting systems.

Respondents suggested a number of changes, such as making this disclosure a recommendation, or replacing it with a combination of narrative and quantitative information (e.g., about programs for tracking and analyzing high-potential incidents, near-misses, and hazardous situations, and the percentage of accidents or incidents that were analyzed and for which root causes were identified).

GSSB response: The requirement for reporting the ‘number of high-potential incidents’ has been changed to a recommendation. In its place, organizations are required to report work-related hazards that pose a risk of high-consequence injury (explained in the earlier theme), which includes those hazards identified as a result of a high-potential incident. In relation to this, an additional requirement has also been included within the Management approach disclosures section (Disclosure 403-2-d in the final Standard), asking organizations to provide ‘a description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system’.

c) Reporting the causes and actions taken in response to work-related injuries that were fatal and non-fatal impairments, and to high potential incidents

One respondent suggested limiting the disclosure to a description of predominant causes, as it was not clear if a list of causes for all specific events was required; such a list would be too detailed. Another respondent mentioned that it should be allowed to explain cases in which cause investigation or actions are still underway.

GSSB response: The disclosure on ‘causes and actions taken’ (403-2-d in the exposure draft) has been combined with the disclosure on ‘hazards’ (403-2-e in the exposure draft), to avoid duplication. The new disclosure (403-9-c in the final Standard) requires reporting the work-related hazards that pose a risk of high-consequence injury, including how these hazards have been determined, which of these hazards have caused or contributed to high-consequence injuries during the reporting period, and actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls. Additionally, the guidance clarifies that this does not require reporting which work-related hazards have caused or contributed to which high-consequence injury during the reporting period; it requires the aggregate analysis of all work-related hazards that resulted in high-consequence injuries. The guidance also explains that if an incident is under investigation, this can be stated in the report. The same revision has been made to the disclosure on work-related ill health (Disclosure 403-10 in the final Standard).

d) Reporting on safety hazards

One respondent suggested the inclusion of a requirement to report a description of safety hazards (instead of a list), and to require that this description focus on the most significant hazards that are typically present within the organization’s workplaces, in particular hazards that could result in disability or loss of life if not properly contained and/or controlled. This would make it more practical for large companies, which engage in a diverse range of operations, to focus on life-threatening hazards.

GSSB response: The disclosure has been revised to cover work-related hazards that pose a risk of high-consequence injury if not controlled, even when there are control measures in place. In addition, the disclosure has been revised so it does not require a list format. The same revision has been made to the disclosure on work-related ill health (Disclosure 403-10 in the final Standard).

e) Reporting the types of work-related injury

One respondent suggested including a requirement to report the main types of work-related injury.

GSSB response: A requirement to report the ‘main types of work-related injury’ has been included, which is consistent with the same requirement in the disclosure on work-related ill health, and examples have been provided in the guidance.

f) Methodology for calculating injury rates

A few respondents mentioned it would be preferable to allow reporters to use other methodologies for calculating injury rates than the one required; for instance, respondents noted that instead of using 1,000,000 hours worked to calculate injury rates, 200,000 hours worked may be more appropriate for small organizations.

GSSB response: The disclosure has been modified to permit the use of either 200,000 hours worked or 1,000,000 hours worked for calculating the injury rates; and requires the organization to state in the report which of the two options it has used.

g) Rates vs. absolute data

Respondents were divided on the benefits of requiring absolute data (e.g., numbers) on work-related injuries (in addition to rates). On the one hand, it was indicated that absolute data enables meaningful comparison across companies; on the other hand, it was mentioned that absolute data can be manipulated by third parties.

GSSB response: The requirements for both absolute data and rates of injury have been maintained. As mentioned by respondents, absolute data is important to enable comparisons over time, or between reporting organizations. This allows for easy recalculation of rates using different methodologies if necessary, for the analysis of reported data.

Disclosure 403-3 Work-related illnesses

a) Not feasible to report work-related illnesses (for both employees and other workers)

Many respondents indicated that it is not feasible to report work-related illnesses for both employees and workers who are not employees, though it is especially challenging for workers who are not employees. They mentioned reasons such as the following:

- Privacy regulations may limit the possibility to share information with other employers (e.g., contractors) or to report details publicly.
- Long-latency illnesses might be unveiled years after exposure, and are often not reported back to the reporting organization.
- When workers work for different employers, it becomes difficult to identify if the illness is due to exposure while working for the reporting organization.
- Psychosocial and behavioral work-related illnesses are difficult to report.

Respondents suggested that reporting data on work-related illnesses for workers who are not employees should be a recommendation, or should, for example, only be a requirement for long-term contractors.

GSSB response: It is acknowledged that accurately capturing work-related illnesses/ill health is a challenge. However, this is not dependent on the status of the worker (whether an employee or not an employee, temporary or long-term, present or former), but on the complexity of diagnosing the illness, determining whether it is work-related, and that the organization gets notified of it. Despite these challenges, whenever the organization identifies or is notified of a case of work-related ill health (for either an employee or a worker who is not an employee, but whose work and/or workplace is controlled by the organization), it is

expected to report it. Therefore, these requirements have been maintained, and additional guidance has been developed on how to report work-related ill health.

Disclosure 403-4 Workers' access to occupational health services

a) Specificity of the disclosure and additional content suggested

Some respondents commented that the information required by this disclosure was too general and subjective to each organization. They suggested including more specific requirements, such as listing the types of occupational health service provided or explaining how the organization ensures the quality of these services. They also mentioned that this information may be challenging to report for workers who are not employees.

GSSB response: The requirement to report the 'percentage of workers that have access to occupational health services' has been substituted with the requirement to provide 'a description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them'.

Additionally, this disclosure has been moved to the Management approach disclosures section, as it relates to how occupational health services are managed (Disclosure 403-3 in the final Standard).

Disclosure 403-5 Worker health promotion

a) Distinction between occupational health and safety and non-work-related health promotion

A couple of respondents considered the separation between occupational health and safety and non-work-related health promotion inappropriate, considering that they are interrelated and should be managed together as part of a continuum of care for workers. On the other hand, one respondent noted that this disclosure, as it was defined, should not be part of this Standard, given the limited evidence demonstrating the effectiveness of health promotion programs.

GSSB response: This disclosure has been kept within the Standard, since it is becoming common practice to treat non-occupational health issues as workplace issues, and since the topic of health promotion is not mature enough to justify developing a specific standard of its own. Additionally, it is valuable to keep this disclosure in the Standard given the guidance developed on respecting workers' right to privacy, non-discrimination, and on the fact that occupational health and safety cannot be substituted with health promotion programs.

b) Specificity of the disclosure and additional content suggested

A few respondents commented that the information required by this disclosure was too general, and suggested some specific metrics for inclusion, such as information about the programs and the health risks they address, and metrics to assess their effectiveness.

GSSB response: The requirement to describe the voluntary programs to address major non-work related health risks has been expanded to include reporting of the specific health risks addressed. The requirement to report the percentage of workers that have access to these voluntary programs has been substituted with a description of how the organization facilitates workers' access to them.

Additionally, the contents of this disclosure have been moved to the Management approach disclosures section, as they relate to how worker health promotion is managed (Disclosure 403-6-b in the final Standard).

Annexes

1. Overview of questionnaire questions

Number	Question
Question 1	<p>The GRI Standards are designed to help organizations communicate about their impacts on the economy, the environment, and society. GRI 403: Occupational Health and Safety covers an organization's impacts on the health and safety of workers, including how these impacts are managed.</p> <p>In your opinion, do the disclosures in GRI 403: Occupational Health and Safety adequately cover an organization's main impacts on the health and safety of workers, or are there any critical contents missing?</p>
Question 2	<p>The GRI Standards are intended to be applicable for organizations of all types, sizes, sectors and locations.</p> <p>Do you believe the disclosures in GRI 403 are feasible for all organizations to report?</p>
Question 3	<p>Are there any sections in this draft Standard where the content or wording is unclear?</p>
Question 4	<p>The GRI Standards are designed to help organizations disclose meaningful and comparable information about their economic, environmental, and social impacts. This information can then be used by stakeholders such as investors, civil society organizations, and others, to make informed decisions.</p> <p>Are the disclosures in GRI 403 adequate to allow report users to make informed decisions about an organization's occupational health and safety impacts?</p>
Question 5	<p>Throughout the Standard, guidance is included to help users better understand and apply the reporting requirements.</p> <p>Are there any sections in GRI 403 where additional guidance is needed to help organizations understand and compile the required information?</p>
Question 6	<p>Do you have any other comments or suggestions related to this draft Standard?</p>
Question 7	<p>With respect to 'The scope of 'workers' in this Standard', is it clear which subset of workers is to be used for reporting the disclosures within GRI 403? (See explanation in lines 172-191) What additional guidance would be useful?</p>
Question 8	<p>The management approach section in GRI 403: Occupational Health and Safety now includes new specific requirements for organizations to report on how they manage occupational health and safety. These requirements focus on management systems, hazards and risks, and worker participation, consultation, information and training. This section is designed to complement, not to replace, the content in GRI 103: Management Approach.</p> <p>With respect to the management approach requirements in GRI 403 (see clauses 1.2.1 – 1.2.7), are there any requirements you think that are not critical for reporting the management approach for occupational health and safety?</p>
Question 9	<p>With respect to Disclosure 403-2 Work-related injuries, is it clear how to report on 'high potential incidents'? (See Disclosure 403-2-c and related definition in lines 617-622) What additional guidance would be useful?</p>
Question 10	<p>With respect to Disclosure 403-3 Work-related illnesses, is it feasible to report work-related illnesses for workers who are not employees? (See Disclosure 403-3-b)</p>

2. Overview of respondents

The table below provides an overview of the public comment respondents. Those who provided feedback via email are highlighted in **gray**. Those who provided feedback via both the Consultation Platform and email are highlighted in **orange**.

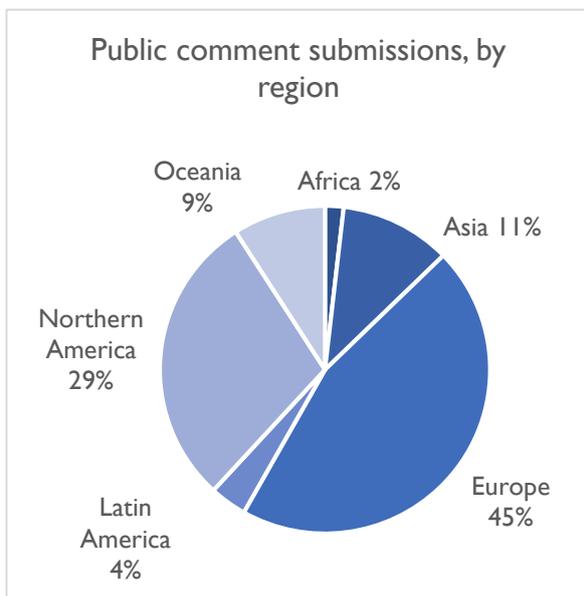
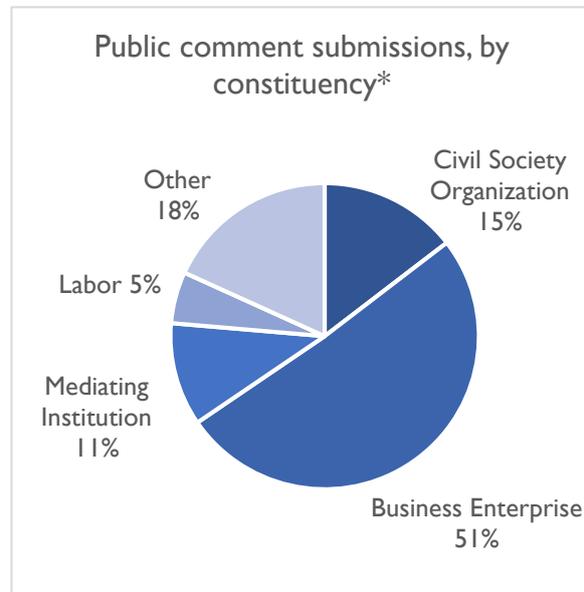
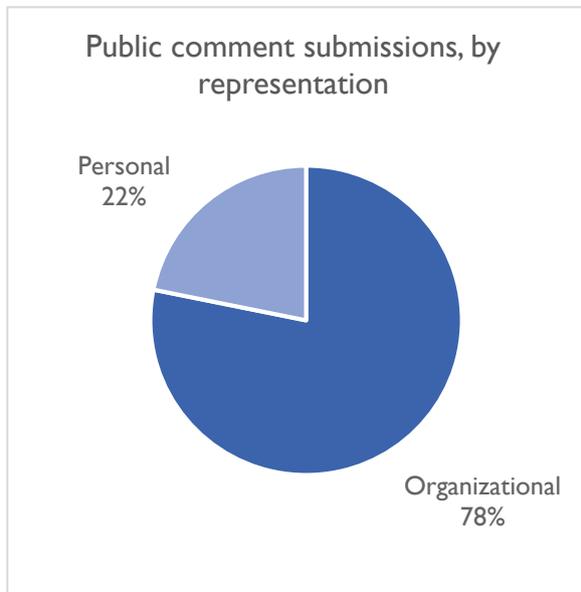
First name	Last name	Representation	Organization	Country	Region	Constituency
Dianah	Brown	Organizational	Safe Work Australia	Australia	Oceania	Other
Leonore	Adams	Organizational	Amtcor Limited	United States	Northern America	Business Enterprise
Habiba	Al Marashi	Organizational	Arabia CSR Network	United Arab Emirates	Asia	Other
Helena	Barton	Organizational	GRI Stakeholder Council	United States	Northern America	Civil Society Organization
A	Belezinis	Personal		Greece	Europe	Business Enterprise
Edris	Boey	Personal		Singapore	Asia	Business Enterprise
Daniel	Braune	Organizational	ProVeg Deutschland e.V. (ProVeg International)	Germany	Europe	Civil Society Organization
Mark	Brownlie	Personal		Canada	Northern America	Business Enterprise
Cristiana	Ciaraldi	Organizational	WBCSD- Cement Sustainability Initiative	Switzerland	Europe	Other
David	Cliff	Organizational	Global Road Safety Partnership (International Federation of Red Cross and Red Crescent Societies)	Switzerland	Europe	Civil Society Organization
Valérie	Coustet	Organizational	SAINT-GOBAIN GROUP	France	Europe	Business Enterprise
Erich	Cuaz	Organizational	Clariant	Switzerland	Europe	Business Enterprise
Steven	De Regter	Organizational	BASF SE	Germany	Europe	Business Enterprise
Lee ann	Disponett	Organizational	Lexmark International, Inc.	United States	Northern America	Business Enterprise
John	Dony	Organizational	National Safety Council	United States	Northern America	Other
Janharmen	Drost	Organizational	Aidsfonds	Netherlands	Europe	Civil Society Organization
Kate	Fileczki	Organizational	Anglo American plc	South Africa	Africa	Business Enterprise

First name	Last name	Representation	Organization	Country	Region	Constituency
Tim	Fisher	Organizational	ASSE	United States	Northern America	Other
Wolfgang	Frosch	Organizational	BASF SE	Germany	Europe	Business Enterprise
Nadine	Galvin	Organizational	Lockheed Martin	United States	Northern America	Business Enterprise
Daniela	Gramer	Organizational	respACT	Austria	Europe	Civil Society Organization
Birgit	Haberl-Arkhurst	Personal		Austria	Europe	Business Enterprise
Belinda	Hall	Personal		United States	Northern America	Business Enterprise
Haslayati	Hashim	Personal		Malaysia	Asia	Other
Ben	Heisler	Organizational	UPS	United States	Northern America	Business Enterprise
Elizabeth	Holleman	Organizational	Boeing	United States	Northern America	Business Enterprise
Johan	Holmquist	Personal		Sweden	Europe	Business Enterprise
Maria angeles	Horna	Personal		Spain	Europe	Business Enterprise
Richard	Jones	Organizational	Institute of Occupational Safety and Health	United Kingdom of Great Britain and Northern Ireland	Europe	Mediating Institution
Artemis	Kostareli	Organizational	IPIECA	United Kingdom	Europe	Mediating Institution
Janae	Lindsley	Organizational	American Association of Occupational Health Nurses, Inc. (AAOHN)	United States	Northern America	Other
Suman	Majumdar	Organizational	JSW Steel Ltd.	India	Asia	Business Enterprise
Sugumar	Mariappanadar	Organizational	International Sustainable HRM Network	Australia	Oceania	Civil Society Organization
Rob	Mcdonald	Organizational	BHP	Australia	Oceania	Business Enterprise
Fernando	Paulon	Organizational	Grupo Sancor Seguros	Argentina	Latin America	Business Enterprise
Gianluca	Principato	Personal		Italy	Europe	Business Enterprise
Jan	Prof. Dr. Wirsam	Organizational	HTW Berlin	Germany	Europe	Civil Society Organization

First name	Last name	Representation	Organization	Country	Region	Constituency
Robert	Ramer	Organizational	UBS Group AG	Switzerland	Europe	Business Enterprise
Braeunig	Rene	Organizational	Glencore	Netherlands	Europe	Business Enterprise
Simon	Roberts	Personal		Australia	Oceania	Other
Carolyn	Rodehau	Organizational	Jointly submitted by the Meridian Group International and the Danish Family Planning Association	United States	Northern America	Civil Society Organization
Rolf	Schwery	Organizational	Schwery Consulting	Switzerland	Europe	Business Enterprise
Peg	Seminario	Organizational	AFL-CIO	United States	Northern America	Labor
Gustavo	Sinner	Organizational	AG Sustentable	Argentina	Latin America	Mediating Institution
Shaun	Subel	Organizational	Discovery Limited	United Kingdom	Europe	Business Enterprise
Suresh	Tanwar	Organizational	Tata Business Excellence Group (A division of Tata Sons Ltd)	India	Asia	Business Enterprise
Gabriella	Tóth	Organizational	RTG Corporate Responsibility Ltd	Hungary	Europe	Mediating Institution
Victor	Toy	Organizational	U.S. Technical Advisory Group (TAG) To The American National Standards Institute (ANSI)	United States	Northern America	Mediating Institution
Peter	Truesdale	Organizational	Corporate Citizenship	United Kingdom	Europe	Mediating Institution
Norman	Umberger	Personal		United States	Northern America	Other
Deborah	Vallance	Organizational	Australian Manufacturing Workers Union	Australia	Oceania	Labor
Kathleen	Vandamme	Organizational	Bekaert	Belgium	Europe	Business Enterprise
Pierre	Vincensini	Organizational	IOE	Switzerland	Europe	Other
Pamela	Vossenas	Organizational	UNITE HERE International Union, Worker Safety & Health Program	United States	Northern America	Labor
Qi	Zhang	Personal		China, mainland	Asia	Business Enterprise

3. Public comment submissions by representation, constituency, and region

Breakdown of the Consultation Platform and email submissions combined by representation, constituency, and region:



*There were no submissions received from the 'investment' constituency.

4. Full list of Stakeholder Workshops

Location	Date	Number of participants
Hong Kong	6 September 2017	16
Taipei	7 September 2017	49
Beijing	13 September 2017	25
New York	20 September 2017	4
São Paulo	25 September 2017	12
Johannesburg	28 September 2017	16
Toronto	4 October 2017	8
Total		130