



Item 04. Summary of technical questions on the GRI Standards

For GSSB information

Date	15 June 2017
Meeting	29 June 2017
Description	<p>This paper provides an overview of technical enquiries that have been sent to the standards inbox, from 8 May until 9 June 2017. The intent is to inform the GSSB about the type of questions that have been received, and to signal which questions may need to be discussed.</p> <p>A log of all technical enquiries is provided in the Annex.</p> <p>The GSSB is asked to review the short summary of technical enquiries and the full log of questions, and to identify any additional questions which may require GSSB discussion or action.</p>

This document has been prepared by the GRI Standards Division. It is provided as a convenience to observers at meetings of the Global Sustainability Standards Board (GSSB), to assist them in following the Board's discussion. It does not represent an official position of the GSSB. Board positions are set out in the GRI Sustainability Reporting Standards. The GSSB is the independent standard-setting body of GRI. For more information visit www.globalreporting.org.

1. Summary of technical enquiries

As agreed with the GSSB in November 2016, the Standards Division provides the GSSB at each monthly meeting with the full set of technical enquiries received via the 'standards@globalreporting.org' inbox. This list can be found in the [Annex](#) and is categorized by main theme.

Questions received during May and the beginning of June were spread across a range of topics, including how to present information in the GRI content index, external assurance, the management approach, and questions on how to report individual disclosures, such as how to report the percentage of operations with implemented local community engagement (Disclosure 413-1). Reporters are also asking for a list of all topics and disclosures included in the Standards.

Most questions were related to the in accordance criteria. Reporters want to know whether they can still be in accordance with the Standards if they cannot disclose all the required information for specific disclosures, whether reasons for omission are permitted for specific disclosures, whether they are required to report on all disclosure items (a, b, c, d), and confirming whether they understood the in accordance criteria for the Core option correctly.

There were no questions related to the materiality definition, but reporters do ask for the guidance on identifying report content and quality (guidance for G4-18) and how to conduct the materiality assessment.

There were no questions on the status of the Sector Disclosures (required or not), but reporters continue to ask on the availability of sector-specific Standards, such as for the Transport and Movie and Television sectors.

2. Questions for the GSSB to discuss

At this point, the Standards Division has not identified specific questions that require further GSSB discussion. However, GSSB members are invited to review the Annex and raise any issues which they believe require further discussion or action.

27 *Annex: Full log of technical enquiries on the GRI Standards, until 9 June 2017¹*

Date received	Category	Enquiry
17-May-17	Content index	I've scrolled through a few GRI-Standards based sustainability reports. All of them have the required GRI Index, but none of them mention the respective disclosures etc. directly in the text – as required by G4. Don't we have to name the universal and topic specific standards on the respective places?
1-Jun-17	Content index	Having started to use the new GRI standards, and having analyzed 2016 reports in accordance with GRI Standards, we have in a frequent number of reports noticed a new way of presenting the GRI Index. The technique seem to be to before each material topic repeat the questions 103-1 to 103-3. We would prefer to only present 103-1 to 103-3 once in the GRI Index but with page references to each place where the question appears. Which is the preferred way to do it in order to meet the intentions of GRI Standards?
31-May-17	External assurance	For the external assurance in particular: Is it possible to choose just some of our operations for the external verification of data? Or do we have to consider all operations?
8-Jun-17	External assurance	How do you ensure that the standards are correctly applied? Are there any control mechanism ensuring that the guidelines are followed?
9-Jun-17	External assurance	I wanted to ask your feedback about any possible changes between GRI Standards and G4 concerning External Assurance related disclosures.
9-May-17	In accordance criteria	<p>Our HR department has a specific question about one of the Standards in relation to remuneration. I believe this relates in particular to 102-39.</p> <p>We currently report the ratio of the increase to the highest salary (our local Managing Director) to the increase in the median salary in all the countries where [Company X] operates.</p> <p>We'd like to know if we would still comply with the standard if we disclose the average of the increase to the salary of the Managing Directors, across all the branches, rather than the increase per individual Managing Director, as we do now.</p> <p>Because we also report the ratio of the highest to the median salary, again by country where we operate, we think this provides transparency about remuneration. Whereas the way we do it now might be a little misleading, giving a lot of prominence to local changes.</p>

¹ Note this log includes only questions received through the 'Standards' email inbox – it does not include other questions from webinar audiences, launch events, or internal GRI Staff queries, unless they were also sent through to the Standards email address.

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24-May-17	In accordance criteria	I need to submit to your attention a question about Table 1 in GRI 101: criteria to claim a report has been prepared in accordance with the GRI. My question involves this statement: "For each material topic covered by a topic specific GRI Standard: comply with all reporting requirements for at least one topic-specific disclosure." Please forgive me if it may seem obvious to you: I'm writing from Italy and I need to be sure I have understood the right thing. My comprehension of the statement above is the following (I'll make use of examples, hoping it will be clearer): Let us say I want to use GRI 404. This topic specific GRI standard consists of 3 disclosures: GRI 404-1, 404-2, 404-3. Suppose I cannot report about GRI 404-2 and 404-3, about GRI 401-1 I shall comply with all reporting requirements, so, given that it consists of two requirements (a and b), I cannot make an omission about requirement b. What I said will not change if I didn't have to make an omission about GRI 404-2 and 404-3, the only difference is that in this latter case I could have chosen the topic specific disclosure where to comply with all requirements. I also assume that, if in addition to GRI 404, I want to use GRI 402, which include only one disclosure, about that disclosure, I shall comply with all reporting requirements, and so on for each additional topic specific GRI I have to use.
26-May-17	In accordance criteria	I am assuming that reasons for omission are not permitted at Core option for 102-1 to 102-13. Is that true?
26-May-17	In accordance criteria	I am reporting a report using the standard for a client and during the writing I find out that the client will not be able to comply with the standard due to data unavailability. For example, on information on employees and other workers, the standard requires us to provide information on the total number of employees based on contract and gender. Apparently, my client does not have information related to the contract types and gender. They only record total number of employee and full time contract types. They do not have records on the temporary employee. Looking at this condition, does it mean that they are not in accordance to the standard?
28-May-17	In accordance criteria	<p>"Requirements: These are mandatory instructions. In the text, requirements are presented in bold font and indicated with the word 'shall'. Requirements are to be read in the context of recommendations and guidance; however, an organization is not required to comply with recommendations or guidance in order to claim that a report has been prepared in accordance with the Standards."</p> <ul style="list-style-type: none"> • Does this mean that for instance for disclosure 302-1 (ENI in G4) all the information from a-f has to be provided or else that a reason for omission needs to be given for each aspect separately (energy categories, sold energy, description of methods, conversion factors, etc.) ? • Or could several missing aspects be summarized under one omission at the level of the disclosure itself (i.e. 302-1)?
31-May-17	In accordance criteria	<i>Question on G4 but applicable to the Standards as well:</i> Do we have to take all subtopics into account or are we allowed to decide on some of these? E.g. if one indicator has a, b, c, d subtopics: Are we then allowed to choose e.g. just a and c?

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8-Jun-17	In accordance criteria	Are there any additional requirements for making a 'Comprehensive' claim under the new GRI Standards compared to GRI G4? In other words, if a user of the GRI G4 made a 'Comprehensive' claim so far, would this user have to consider additional aspects when aiming on being 'Comprehensive' with the new GRI Standards as well?
8-Jun-17	In accordance criteria	With the new standards, please correct me if I'm wrong, but do we have to complete the entire GRI 403 on OCCUPATIONAL HEALTH AND SAFETY? The new standard gives us more work as we need to collect more data, so I just wanted to double check that with you, with an example of a particular topic.
9-Jun-17	In accordance criteria	According to the Guidance for Disclosures on Management Approach the organization describes the components of the management approach and my question - is it obligatory for reporter to include all components, such as policies, commitments, goals and targets, responsibilities, resources, specific actions in the reporting. Do I have to require as auditor from reporting organization to show all components in reporting?
26-May-17	Management Approach	I am already preparing a sustainability report with the GRI Standards for [Company X] and I have a question. Which "code" should I use for the Management Approaches? I am talking about the ex DMAs. Should I use MA?
26-May-17	Management Approach	In a material topic I have included several GRI standards. In theory I have to report the Management Approach for each of the GRI standards but it is the same answer so I have only included once the standard 103. Is it ok? If not, how can I indicate that GRI 103 applies to all the GRI standards in that material topic without to repeat it?
28-May-17	Management approach	The Standards contain more detailed requirements for the management approaches (103-2). Since this is a qualitative topic, could you provide more guidance as to when a management approach is considered 'GRI-compliant': <ul style="list-style-type: none"> • Does an organization have to indicate explicitly when certain aspects are not fulfilled, e.g. 'we don't have a policy or target...' or only describe what's there? • Are there minimum requirements for the description of the components of the management approaches? (the components themselves are 'required', whereas the guidance information in the Standards is only 'recommended')
9-May-17	Materiality	Do you know something about the separate guidance which describes the steps that an organization may go through in order to define the specific content of the report? I know that it will be presented as a separate document (to be made available on the GRI website in early 2017).
18-May-17	Materiality	With reference to GRI 101, pg 23, under Core option, criteria 5 regarding (series 200, 300, 400) That means I only need to choose standards that are material to my organization, ignoring the rest and of all the material standards I choose, at minimum, I only need to report fully on one-topic specific disclosure. e.g. If I select GRI 401, 402, 403 as my material topic, I only need to select one out of the 3 GRIs for full disclosure?

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18-May-17	Materiality	Do I need to select GRIs from every series. E.g. if I feel GRI 300 series is not material to my organization , can I leave it out completely.
18-May-17	Materiality	Can I use different materiality matrix (or different way to measure materiality) for the different series, e.g one for 200 series, one for 300 series and one for 400 series.
18-May-17	Relation with other frameworks	I am writing about the EU CSR guideline 2014/95. We have three clients we are reporting for using GRI guidelines and checks. Now our clients are wondering, how the EU guideline will affect the reporting. We were wondering if you could provide us with some information on the content, the EU guideline requires? Since our clients are reporting in a frequency of two years, it would be very interesting to know what has to be reported during the “gap year“.
30-May-17	Relation with other frameworks	I was wondering if a linkage document is available that connects the European directive on non-financial disclosure (2014/95/EU) with the new GRI Standards? I am well aware of your publication “Making Headway in Europe” that links GRI G4 with the EU directive, however, as more and more companies are switching to GRI Standards when reporting on their sustainability it would be great to have an updated linkage document.
17-May-17	Sector Disclosures	[Company X] would like to know if there are any specific Transport disclosures? Of if the collected data on transport should be reported in emission?
25-May-17	Sector Disclosures	I would like to know if there is a specific GRI standards for movie & television industry?
5-Jun-17	Topic Boundary	We have two more inquiries regarding [Company X] reporting scope next year. As two of [Company X] business segments: Environmental Water [Subsidiary X] and Greentech [Subsidiary X], are listed subsidiaries which will develop standalone sustainability reports next year. May I know: Can [Subsidiary X] and [Subsidiary X] component be excluded from [Company X] sustainability report boundary?
18-May-17	Transitioning to GRI Standards	Is there a list where I can match the old G4 standards to the new GRI equivalent standards?
15-May-17	General Disclosures	I have a question about requirements to disclosure 102-38-4.4.2 It says that reporting companies should calculate the median annual total compensation for all employees. Does it mean that the reporting companies should calculate the value separating the higher half of total compensation distribution, from the lower half? The question arose because in Russian version of G4 the disclosure was translated as “ratio ... to the average compensation”. Should the reporting companies adjust their approach to collection of data to report on ratio to the median annual total compensation?

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7-Jun-17	Economic Standards	Concerning disclosure 201-1: a. What value is here relevant for “Economic value retained: ‘direct economic value generated’ less ‘economic value distributed’.”? EBITDA? Are Tax and Amortisation considered? b. If for the company’s stakeholders only the value distributed (to charities and projects) is relevant, does the company have to report all figures related to topic closure 201-1 to conform to the GRI options “core”?
18-May-17	Environmental Standards	I would like to kindly ask for your clarification regarding the energy consumption indicator GRI 302: Is electricity consumption for the direct activity of the organization, should be reported within 302-1 or 302-2?
10-May-17	Social Standards	My question concerns the “excluding employees” marked in yellow? I do not understand if the rates are to be calculated without employees, to me it should be “including”? 2.3.1 report the occupational disease rate (ODR), lost day rate (LDR), and absentee rate (AR) for all workers (excluding employees) whose work, or workplace, is controlled by the organization, with a breakdown by:
17-May-17	Social Standards	What and who is included in the definition for governance body? Is it just the supervisory board or also the management board of a DAX 30 company? Relating to Disclosure 405-1 Diversity of governance bodies and employees an inclusion or exclusion of the management board could make a difference in reporting for companies.
29-May-17	Social Standards	The reporting organization shall report percentage of operations with implemented local community engagement. I don't really understand percentage of which operations. Do we count how much in cash/value in money the Company invested in different activities? Or maybe if there are 4 companies in the group and each one is engaged in the local community activities the percentage will be 100%?
31-May-17	Glossary	<u>Question on G4 but applicable to the Standards as well:</u> What is the definition of “employment category”? Your guidance states that the definition should be based on the company’s human resource management. However, which hierarchical level do you mean here?
9-Jun-17	Glossary	I'm emailing in regards to a question I've about the 2016 GRI Index for [Company X]. In page 9 it mentions the number of full-time equivalent consultants, and I was wondering what do they mean by that? How is the FTE calculated? Some sources tell me FTE are those who work more than 120 days per year; while others say 150-days per year (which is the maximum)? Do you know which of this is true?
19-May-17	Miscellaneous	We are a vending firm, so we manage automatic distributors by several customers; we have just participated to a public contest where a step important to collect points is "have published a sustainability report according to the GRI guidelines". We resulted second, but the winner has collected the points with the document called A (in attach). It doesn't seem to respect the guidelines cause it has no reported the "in accordance option", nor the level, nor the GRI content index. It seems to be a social report, with some common arguments with GRI, but not a GRI report. Is it correct?

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24-May-17	Miscellaneous	I was wondering if you have an excel list with all the topics & indicators of the GRI standard? Right now the list you have is in relation to GRI G4, but I would like to have a full list of all the indicators of the GRI standard only.
30-May-17	Miscellaneous	I was looking at the GRI website and I was wondering if there are any reporting guidelines/criteria for circular assets in particular?
30-May-17	Miscellaneous	Do you have an overview of all standards and their indicators, e.g. in an excel document? Or do I need to access all standards separately?
30-May-17	Miscellaneous	<p>I have a question regarding what is required for the historical figures. When reporting according to G4 we have included three years historical figures. What is required when it comes to historical figures in the GRI Standards, for example for 102-8 and 405-1? Will we need figures for 2017, 2016 and 2015, or is it enough with figures for 2017? Are there any differences between standard disclosures and specific standard disclosures in GRI Standards when it comes to the historical figures?</p> <p>Is it the same as for G4?</p>
31-May-17	Miscellaneous	<p><u>Question on G4 but applicable to the Standards as well:</u> Is it possible to choose just some of our operations for our sustainability disclosure or do we have to take all operations from the whole [Company X] Group into account?</p> <p>Assuming that we are allowed to choose just some of our operations for the report: Are we then allowed to provide indicators information just for the chosen operations?</p> <p>Regarding the economic indicators: Our numbers will be based in group wide financial annual account. In case we are allowed to choose just some of our operations for the report, do we also have to consider just the chosen operations for the financial disclosure? Or are we allowed to report group wide numbers despite of the fact that we have potentially chosen just some of our operations for the report?</p>
6-Jun-17	Miscellaneous	I am interested in following points: How the other IT company deal with GRI?
6-Jun-17	Miscellaneous	I am interested in following points: Good example of how to use only selected GRI standards?