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Item 14 – Public comments received on the Revised GSSB Work Program 2017-2019

For GSSB information and discussion

Date	28 March 2018
Meeting	11-12 April 2018
Description	<p>This document presents the public comments received on the Revised GSSB Work Program 2017-2019, during the consultation period from 17 January to 23 March 2018. Comments were received by one respondent.</p> <p>The Stakeholder Council has also provided comments. Their comments are presented separately, in Item 13 - SC Feedback on the Revised GSSB Work Program 2017-2019.</p>

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1. *Comments from Annelisa Grigg (UN Environment World Conservation Monitoring Centre)*

Dear Sir/ Madam

Many thanks for the opportunity to comment on your work plan. I see that revision of the GRI's biodiversity indicator standard (GRI 304) is not currently proposed. I would encourage GRI to revisit these indicators. There is substantial work underway with a range of sectors to explore how they can measure and monitor impact and performance on biodiversity. The European Business & Biodiversity platform's financial community of practice is investigating biodiversity metrics for the finance sector, we with 12 mining and oil and gas companies (linked to IPIECA) are exploring biodiversity indicators for the extractive sector and the Cambridge Institute for Sustainability Leadership has developed a 'healthy ecosystem metric' with agribusiness. This body of work could potentially contribute to an update of GRI's current indicators which currently lack clearly defined links to corporate management actions or impact. Disclosure 304-1, for example, sets out a requirement to report proximity to protected areas and other areas of high biodiversity, thereby flagging a potential risk, but then does not require the company to report on how they are managing the risk. I have conducted multiple benchmarks of different sectors. Companies interpret the current guidance very differently resulting in a lack of comparability across companies within the same sector. I would therefore urge you to consider reworking these indicators in the light of growing corporate interest in the topic and these new methodological developments.

With kind regards

Annelisa

Annelisa Grigg

Principal Specialist, Business and Biodiversity

UN Environment World Conservation Monitoring Centre