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## Basis for conclusions for *GRI 303: Water and Effluents 2018*

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

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<b>Date</b>	28 June 2018
<b>Description</b>	<p>This document sets out the significant issues raised by respondents on the <a href="#">exposure draft of GRI 303: Water and Effluents (GRI 303)</a>, during the first consultation period from 10 August to 9 October 2017. It incorporates public comments received via the <a href="#">GRI Standards Consultation Platform</a> and official feedback submissions received via email, as well as input from stakeholder workshops carried out in select regions.</p> <p>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 <a href="#">GSSB website</a>.</p> <p>The final <i>GRI 303: Water and Effluents 2018</i> Standard published on 28 June 2018 can be downloaded <a href="#">here</a>.</p>

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# About this document

This document sets out the significant issues raised by respondents on the [exposure draft of GRI 303: Water and Effluents](#) (hereafter *GRI 303*), 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 eight [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 this 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 303*

The proposal for the review of *GRI 303* 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 303* in order to represent and align with internationally-agreed best practice and recent developments in water management and reporting. The scope of this review also included the effluents-related disclosures from *GRI 306: Effluents and Waste* (hereafter *GRI 306*), which have now been incorporated in the revised *GRI 303*.

The revision of *GRI 303* 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 303*.

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 303*, including adding background context covering effluents;
- reviewing the existing [management approach disclosures](#) section within *GRI 303* and *GRI 306*, 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 water and effluents (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 water and effluents;
- revising relevant definitions in the *GRI Standards Glossary* and, where applicable, developing new ones.

## *Scope of the public consultation*

The exposure draft of *GRI 303* 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 water and effluents, 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:

- Management approach disclosures for water/effluents.
- Calculation methods of water consumption.
- Feasibility and meaningfulness of reporting water consumption separately for freshwater and seawater.
- Feasibility of reporting water discharge by level of treatment or quality.
- Feasibility of reporting substances of concern.
- Additional disclosures for reporting impacts in the supply chain and related to products and services, particularly in areas of water stress.

Any comments relating to areas out of scope for the revision of *GRI 303* (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 1](#) 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](mailto:standards@globalreporting.org) or [water@globalreporting.org](mailto:water@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, 52 individuals and organizations submitted feedback on the exposure draft.

46 submissions were received via the Consultation Platform, from individuals and organizations across 21 countries. Of these, 32 were submissions on behalf of an organization or groups of organizations (such as an industry association or trade group), and 14 were personal submissions.

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

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 eight 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 303*, 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
- Cross-cutting themes
- Themes by disclosure

## General themes

### Additional content suggested for inclusion

Some respondents suggested the inclusion of additional content within the Standard. The following topics were proposed for inclusion: water risk and dependencies, impact mitigation, and water intensity/efficiency metrics.

#### **a) Water risk and dependencies**

A few respondents suggested enhancing the disclosures to enable more comprehensive reporting on water risks and dependencies.

*GSSB response:* It has been clarified that through a comprehensive understanding of its water use, an organization can assess the impacts it has on itself. No other changes have been made, as the overall aim of the GRI Standards is to help organizations communicate about their impacts on the economy, environment, and society.

#### **b) Impact mitigation**

A few respondents argued that the disclosures largely focus on communicating “the impact made” but not on “the impact mitigated”.

*GSSB response:* No change has been made, because organizations are already required to explain how they manage the material topic and its impacts and state the purpose of their management approach, i.e., whether its purpose is to avoid, mitigate, or remediate negative impacts, or to enhance positive impacts under [Disclosures 103-2-a](#) and [103-2-b](#) of GRI 103: Management Approach.

#### **c) Water intensity/efficiency metrics**

A few respondents suggested adding water intensity and/or efficiency metrics or targets to assess organizational performance, as these metrics implicitly adjust for external factors such as changing organizational size or production size.

*GSSB response:* Water intensity/efficiency metrics have not been included as it was agreed that these are not the most essential to help understand how an organization manages water-related impacts. It has, however,

been clarified that organizations can report any additional information about their water stewardship efforts and practices beyond what is required in the Standard, including water efficiency metrics.

## Cross-cutting themes

### Water consumption

#### a) Definition for water consumption

Many respondents commented that they could not calculate water consumption according to the definition provided in the exposure draft of GRI 303, because they do not discharge water back to the original source, and consequently, their consumption figures would be very high.

*GSSB response:* The focus on the ‘original source’ has been removed from the definition of water consumption. The definition of water consumption has been changed to: ‘sum of all water that has been withdrawn 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 surface water, groundwater, or third party over the course of the reporting period’.

#### b) Reporting water consumption separately for freshwater and seawater

Based on a discussion that impacts from consuming seawater and freshwater vary significantly, a question about whether freshwater and seawater consumption should be reported separately was included in the consultation questionnaire upon request of the GSSB. The majority of respondents responded that it is in fact meaningful to report consumption separately for freshwater and seawater, but admitted that either it would not be possible for them to distinguish between these different sources as they are mixed during the production process, or the percentage of organizations for whom this might be relevant is insignificant.

*GSSB response:* Based on public feedback, no requirement, recommendation, or guidance has been added to report water consumption for freshwater and seawater separately.

### Sources of water withdrawal/discharge destinations

#### a) More guidance on third-party water

Many respondents highlighted that a definition or clarification is necessary for the term ‘third-party water’. Some respondents suggested separating out wastewater supplied from another organization, as this is considered reused water and a good practice in sustainable water management. It should be reported separately to incentivize this.

Respondents also requested more guidance on how to measure impacts from water supplied by third parties in a feasible and meaningful way, especially when this is the main water withdrawal source/discharge destination.

*GSSB response:* A definition of third party has been included to clarify its meaning. Further, for water withdrawal, it has been clarified that if water is supplied by a third party, the organization is required to request information about its original sources from the provider. In addition, recognizing that data on original sources may not always be available depending on the country of operation, the organization can omit reporting this information provided it reports reasons for omission. Where this data is available, organizations are required to report it as it is crucial for providing a complete overview of impacts. Finally, for water discharge, the recommendation to report separately the volume of water discharge that is sent for use to other organizations has been changed into a requirement. In addition, it has been clarified that as an

example of discharge to third party, an organization can send (waste)water to other organizations for further use.

## Water-stressed areas

### a) Identifying areas with water stress

Some respondents requested that the geographical scale of a water-stressed area be defined at least at a watershed, river basin and/or aquifer level, and not at a country level. Further, many concerns were raised about the prescriptive character of the tools and methodologies referenced in the Standard for measuring water-stressed areas, as limiting organization's capacity to use their own assessments and hydrology experts.

Few respondents flagged that there is a discrepancy between the definition of water stress which includes water quality, and the indicators for measuring water-stressed areas which do not account for water quality.

*GSSB response:* It has been clarified that water stress in an area may be measured at catchment level at a minimum. It has been further clarified that organizations can use their own assessments to complement the results of publicly available tools referenced in the Standard. The discrepancy between the definition of water stress and indicators to assess water stress has also been explained.

## Themes by disclosure

### Management approach disclosures

#### a) Surface runoff

A few respondents commented that it will not be feasible for them to collect information about their surface runoff across the whole supply chain. Further, one respondent suggested that the requirement should be made generic for all sectors, and not only if it occurs during agricultural practices.

*GSSB response:* The reference to agricultural runoff has been removed to make the requirement generic to all sectors such that the organization can report on its impacts in any sector where surface runoff occurs.

#### b) Unfeasible to report impacts in the value chain

A few respondents commented that it would be unfeasible for them to provide quantitative information about their water use and effluent discharge across the value chain, due to large and complex supply chains. Further, a few respondents requested more guidance on the type of information expected to be reported.

*GSSB response:* No changes have been made, as the organization is recommended, not required, to provide an overview of where and how water is withdrawn, consumed, and discharged across its value chain. However, more guidance has been provided about the type of information expected to be reported.

## Disclosure 303-I Water withdrawal and consumption

### a) Water consumption disclosures detached from water withdrawal

Some respondents raised a concern about feasibility of reporting against Disclosure 303-I, as the calculation method implies that organizations need to report on both their water withdrawal and

water discharge to compile data for water consumption. This might lead to a risk that organizations will omit some of the disclosure content or will ignore the indicator entirely.

*GSSB response:* The water consumption disclosures have been separated from the water withdrawal disclosures, to improve the feasibility of reporting in full on either one of these disclosures.

### **b) Water recycling and reuse**

A few comments argued for making reporting on recycling and reuse a requirement, as an important practice in water management that improves operational efficiency and helps to reduce withdrawals. Few others suggested revising the definition of recycling and reuse and clarifying how this can be calculated.

*GSSB response:* Reporting the percentage of water recycled and reused is maintained as a recommendation, because it is not essential to understand an organization's water impacts. However, the definition of water recycling and reuse has been revised, a formula has been added to clarify how to report this percentage, and an example has been provided in the guidance.

### **c) Including rainwater as a separate source**

*GSSB response:* Rainwater has not been included as a separate source, because it is included under fresh surface water in the sources of water withdrawal. Further, from an impact perspective, it makes little difference whether water is withdrawn from the surface or before it reaches the surface as rainwater.

## **Disclosure 303-2 Water discharge**

### **a) Water discharge by level of treatment vs. water quality**

The questionnaire included a question whether it is more meaningful to report discharges by level of treatment or level of quality. There was a strong preference among respondents to report water discharge by quality rather than by treatment, as it is a better proxy for understanding the level of impact on the environment.

*GSSB response:* Following public feedback, the requirement to report water discharge by level of treatment has been changed to a recommendation.

### **b) Unfeasible to report substances of concern**

Many respondents flagged that they would not be able to report the required data for *all* substances of concern for which they treat their discharges (discharge limits set for each substance, an explanation of how they are set, and performance against the limits).

*GSSB response:* It has been clarified that only priority substances of concern are required to be reported. Further, the quantitative disclosure has been changed to request narrative descriptions of how priority substances of concern are identified and managed.

### **c) Context of water discharges is missing**

Many respondents raised a concern that the water discharge requirements lack information about the context of discharges, i.e., water quality of the receiving body, which is critical to understand the true impact of discharges.

*GSSB response:* A requirement has been added to describe whether an organization has considered the profile of the receiving waterbody when determining any minimum standards for the quality of water discharges. Further, a requirement has been added to report total water discharge to areas with water stress, to account for the characteristics of the water body.

## Disclosure 303-3 Spills and leaks

### a) Place of disclosure in the Standard

One respondent highlighted that spills and leaks should not be covered in GRI 303, because it is subject to incidental reporting and is not exclusive to the topic of water.

*GSSB response:* Disclosure 303-3 (Spills and leaks) has been removed from the Standard. Spills and leaks cover other topics as well, such as waste, biodiversity, and air emissions. A standalone Standard on spills and leaks will be developed which can then be cross-referenced to the water disclosures.

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

### a) Unfeasible to report supply chain data

Many respondents commented that they would not be able to collect the quantitative information about impacts in their supply chain, due to complex supply chains spanning thousands of suppliers.

*GSSB response:* No changes have been made to the status of the disclosures asking for information about the supply chain. Reporting quantitative information about water withdrawal, discharge and consumption in the supply chain is recommended, which means that organizations are not required to report this information. However, it has been clarified that organizations should only report total water withdrawal, total water consumption and the percentage of suppliers that have set minimum standards for the quality of their water discharge for their suppliers causing material water-related impacts.

### b) Place of disclosure in the Standard

One respondent stated that the disclosure requests qualitative information, which undermines the logic of the Standard and should thus be moved to the Management Approach disclosures.

*GSSB response:* The contents of Disclosure 303-4 (Impacts in the supply chain and related to products and services) have been re-allocated throughout the Standard, to better align with the structure of the GRI Standards. The requirements that ask for narrative information about impacts have been moved to the management approach, while reporting recommendations that ask for quantitative data have been moved to respective topic-specific disclosures.

# Annexes

## 1. Overview of questionnaire questions

Number	Question
<b>Question 1</b>	<p>The GRI Standards are designed to help organizations communicate about their impacts on the economy, the environment, and society. GRI 303: Water and Effluent covers an organization's impacts related to water and effluents, including how these impacts are managed.</p> <p>In your opinion, do the disclosures in GRI 303: Water and Effluents adequately cover an organization's main impacts on water and effluents, or are there any critical contents missing?</p>
<b>Question 2</b>	<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 303 are feasible for all organizations to report?</p>
<b>Question 3</b>	<p>Are there any sections in this draft Standard where the content or wording is unclear?</p>
<b>Question 4</b>	<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 303 adequate to allow report users to make informed decisions about an organization's impacts on water and effluents?</p>
<b>Question 5</b>	<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 303 where additional guidance is needed to help organizations understand and compile the required information?</p>
<b>Question 6</b>	<p>Do you have any other comments or suggestions related to this draft Standard?</p>
<b>Question 7</b>	<p>The management approach section in GRI 303: Water and Effluents now includes new specific requirements for organizations on identifying and managing their water and effluent-related impacts. This includes emphasis on understanding how and where water is used, working with others to manage water as a shared resource, and understanding the process for setting targets. 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 303 (see clauses 1.2.1 – 1.2.6), are there any requirements you think that are not critical for reporting the management approach for water/ effluents?</p>
<b>Question 8</b>	<p>With respect to Disclosure 303-1 Water withdrawals and consumption, is it clear how to calculate water consumption? (see Disclosure 303-1-c) What additional guidance would be useful?</p>
<b>Question 9</b>	<p>GRI 303 currently requires reporting total water consumption (including all sources) for water-stressed areas and for all areas (see Disclosure 303-1-c and 303-1-d).</p> <p>With respect to Disclosure 303-1 Water withdrawals and consumption, is it meaningful and feasible to report water consumption separately for freshwater and seawater?</p>
<b>Question 10</b>	<p>With respect to Disclosure 303-2 Water discharge, do you prefer to report discharges by level of treatment or level of quality?</p>

**Question 11** With respect to *Disclosure 303-2 Water discharge*, is it clear how to report on substances of concern? (see *Disclosure 303-2-d*) What additional guidance would be useful?

**Question 12** With respect to *Disclosure 303-4 Water impacts in the supply chain and related to products and services*, for organizations that cannot report water consumption or withdrawal for their suppliers (as recommended in clause 2.5.1), do you suggest additional disclosures that could help to communicate about their supply chain impacts, particularly in areas of water stress?

## 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.

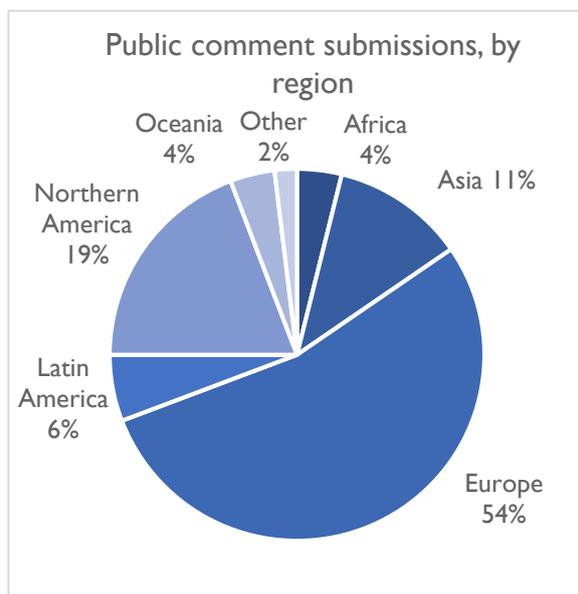
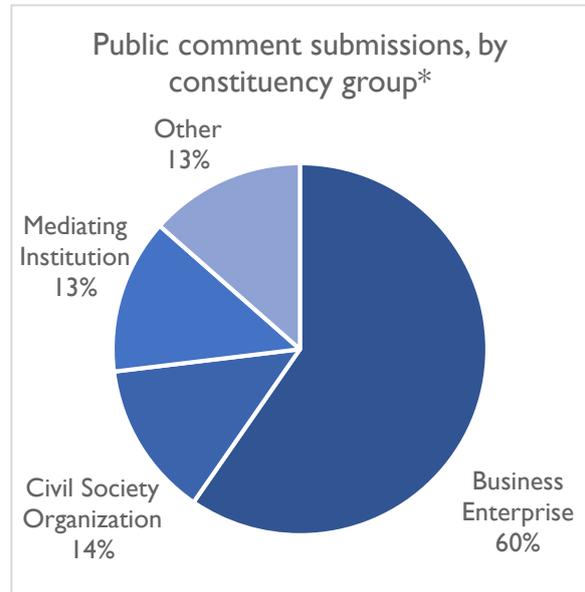
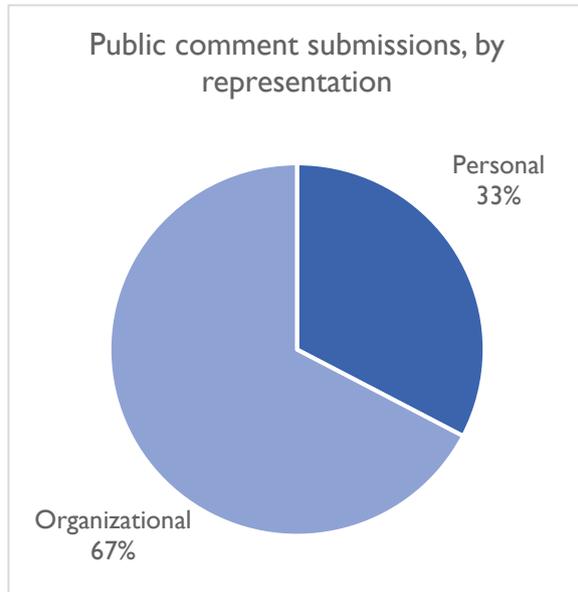
First name	Last name	Representation	Organization	Country	Region	Constituency
Albertus	Abbing	Personal		United Kingdom	Europe	Business Enterprise
Habiba	Al Marashi	Organizational	Arabia CSR Network	United Arab Emirates	Asia	Other
Rodrigo	Almeida	Organizational	Vale S/A	Brazil	Latin America	Business Enterprise
Natali	Archibee	Organizational	The Mosaic Company	United States	Northern America	Business Enterprise
Helena	Barton	Organizational	Gri Stakeholder Council	United States	Northern America	Civil Society Organization
Laurent	Bellet	Organizational	EDF	France	Europe	Business Enterprise
Ger	Bergkamp	Organizational	ARCOWA	Switzerland	Europe	Business Enterprise
Anaïs	Blasco	Organizational	WBCSD	France	Europe	Business Enterprise
Daniel	Braune	Organizational	Proveg Deutschland E.V. (Proveg International)	Germany	Europe	Civil Society Organization
Tanja	Castor	Organizational	BASF SE	Germany	Europe	Business Enterprise
Annalisa	Citterio	Organizational	CNH Industrial	Italy	Europe	Business Enterprise
Erich	Cuaz	Organizational	Clariant	Switzerland	Europe	Business Enterprise
Marc	Despiegelaere	Organizational	Protos	Belgium	Europe	Civil Society Organization
Lingaraj	Dinni	Personal		India	Asia	Business Enterprise
Lee Ann	Disponett	Organizational	Lexmark International, Inc.	United States	Northern America	Business Enterprise
Peter	Easton	Organizational	Easton Consult SPRL	Belgium	Europe	Mediating Institution
Alfredo	Fernandez	Organizational	Ericsson Group	Sweden	Europe	Business Enterprise
Kate	Fileczki	Organizational	Anglo American Plc	South Africa	Africa	Business Enterprise
Ken	Fung	Personal		Australia	Oceania	Other

First name	Last name	Representation	Organization	Country	Region	Constituency
Daniela	Gramer	Organizational	Respect	Austria	Europe	Civil Society Organization
Sergio	Guida	Personal		Italy	Europe	Business Enterprise
James	Hazelton	Personal		Australia	Oceania	Civil Society Organization
Elizabeth	Holleman	Organizational	Boeing	United States	Northern America	Business Enterprise
Johan	Holmquist	Personal		Sweden	Europe	Business Enterprise
Ambika	Jindal	Personal		Netherlands	Europe	Other
Erdem	Kolcuoglu	Personal		Turkey	Asia	Mediating Institution
Artemis	Kostareli	Organizational	Ipieca	United Kingdom	Europe	Mediating Institution
Adriana	Lagrotta Leles	Organizational	SANASA	Brazil	Latin America	Business Enterprise
Sarah	Lockwood	Organizational	Deloitte	France	Europe	Business Enterprise
Paulo	Luz	Personal		Portugal	Europe	Other
Suman	Majumdar	Organizational	JSW Steel Ltd.	India	Asia	Business Enterprise
Stefan	Marinkovic	Organizational	ISO/TC 282/SC 4	Switzerland	Europe	Civil Society Organization
Nick	Martin	Organizational	Beverage Industry Environmental Roundtable	United States	Northern America	Business Enterprise
Alexis	Morgan	Personal		Canada	Northern America	Civil Society Organization
Dr. Prachi Ugle	Pimpalkhute	Personal		India	Asia	Other
Gianluca	Principato	Personal		Italy	Europe	Business Enterprise
Hongqiang	Ren	Personal		Switzerland	Europe	Civil Society Organization
Maria	Rojas	Organizational	Repsol	Spain	Europe	Other
William	Sarni	Personal		United States	Northern America	Business Enterprise
Rolf	Schwery	Organizational	Schwery Consulting	Switzerland	Europe	Business Enterprise
Shannon	Scott	Personal		United Arab Emirates	Asia	Business Enterprise
Thomas	Senac	Personal		France	Europe	Business Enterprise
Mei	Shelp	Organizational	Barrick Gold	Canada	Northern America	Business Enterprise

First name	Last name	Representation	Organization	Country	Region	Constituency
Gustavo	Sinner	Organizational	AG Sustentable	Argentina	Latin America	Mediating Institution
Truke	Smoor	Personal		United States	Northern America	Business Enterprise
Siegfried	Spanig	Organizational	Arcelormittal South Africa Limited	South Africa	Africa	Business Enterprise
Gabriella	Tóth	Organizational	RTG Corporate Responsibility Ltd	Hungary	Europe	Mediating Institution
Peter	Truesdale	Organizational	Corporate Citizenship	United Kingdom	Europe	Mediating Institution
Galya	Tsonkova	Organizational	Coca-Cola HBC AG	Bulgaria	Europe	Business Enterprise
Kathleen	Vandamme	Organizational	Bekaert	Belgium	Europe	Business Enterprise
Victor	Wong	Organizational	Gap Inc	United States	Northern America	Business Enterprise
Hayley	Zipp	Organizational	ICMM	United Kingdom	Europe	Mediating Institution

### 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' and 'labor' constituencies.

## 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
Bogota	3 October 2017	12
Toronto	4 October 2017	8
<b>Total</b>		<b>142</b>