



Item 11 – Draft GSSB basis for conclusions for *GRI 403: Occupational Health and Safety*

For GSSB information and comments

Date	28 March 2018
Meeting	11-12 April 2018
Project	Review of <i>GRI 403: Occupational Health and Safety</i>
Description	<p>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.</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 GSSB website.</p> <p>This document will be updated, as needed, following the GSSB approval of <i>GRI 403</i>.</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.

Contents

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

24 About this document

25 This document sets out the significant issues raised by respondents on the [exposure draft of GRI](#)
26 [403: Occupational Health and Safety](#) (hereafter *GRI 403*), during the public comment period, which ran
27 between 10 August and 9 October 2017. It summarizes:

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

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

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

39 Introduction

40 *Background and objectives for the revision of* 41 *GRI 403*

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

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

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

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

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

69 *Scope of the public consultation*

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

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

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

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

83 *Overview of official public comment* 84 *submissions*

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

87 **GRI Standards Consultation Platform**

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

92 **Feedback via email**

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

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

98 Total participation during the public comment period

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

100 48 submissions were received via the Consultation Platform, from individuals and organizations
101 across 21 countries. Of these, 37 were submissions on behalf of an organization or groups of
102 organizations (such as an industry association or trade group), and 11 were personal submissions.

103 10 individuals or organizations submitted feedback via email; three of these respondents also
104 submitted comments through the Consultation Platform. Out of the remaining seven email
105 submissions, six were on behalf of an organization or groups of organizations, and one was a
106 personal submission.

107 For more detail, see the following:

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

114 *Stakeholder workshops*

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

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

122 Each small group was provided with excerpts from the exposure draft and asked to answer specific
123 questions relating to the relevance, feasibility, and clarity of the contents. Each group was asked to
124 record their feedback for discussion with the full group. Each participant was also given an individual
125 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 workers within the scope, 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'.

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

173 Additional content suggested for inclusion

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

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

180 *GSSB response:* It has been clarified that leading indicators are often unique and tailored to a specific
181 organization, and therefore, no additional leading indicators have been added as requirements within the
182 Standard. However, additional examples of leading indicators have been included in the guidance for clause
183 1.4.4.

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

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

196 Themes by disclosure

197 Management approach disclosures

198 a) Management system standards

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

202 *GSSB response:* Clause 1.2.1 in the Management approach disclosures section has been revised to require
203 the organization to report 'a statement of whether an occupational health and safety management system
204 has been implemented, including whether:

- 205 • it was implemented because of legal requirements, and if so a list of the requirements;
- 206 • it is based on recognized risk management and/or management system standards/guidelines, and if
207 so a list of the standards/guidelines.'

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

210 **a) Recognized standards/guidelines**

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

214 *GSSB response:* Disclosure 403-1 has been revised to focus on occupational health and safety management
215 systems based on legal requirements and/or recognized standards/guidelines, as reported under clause 1.2.1
216 in the Management approach disclosures section.

217 **b) Basis for reporting the coverage of the management system**

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

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

228 Disclosure 403-2 Work-related injuries

229 **a) Reporting on impairments**

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

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

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

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

248 **b) Reporting on high-potential incidents**

249 Many respondents found it challenging to understand the concept of 'high-potential incidents', and
250 suggested including more guidance and examples. They also considered the concept to be subjective,

251 as it varies across different organizations and depends on the industry or sector in which an
252 organization operates, thus undermining comparability, and penalizing the most mature organizations
253 with better reporting systems.

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

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

266 **c) Reporting the causes and actions taken in response to work-related injuries that were fatal** 267 **and non-fatal impairments, and to high potential incidents**

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

272 *GSSB response:* The disclosure on ‘causes and actions taken’ (403-2-d) has been combined with the
273 disclosure on ‘hazards’ (403-2-e), to avoid duplication. The disclosure now requires reporting the work-
274 related hazards that pose a risk of high-consequence injury, including how these hazards have been
275 determined, which of these hazards have caused or contributed to high-consequence injuries during the
276 reporting period, and actions taken or underway to eliminate the hazards and minimize risks using the
277 hierarchy of controls. Additionally, the guidance clarifies that this does not require reporting which work-
278 related hazards have caused or contributed to which high-consequence injury during the reporting period; it
279 requires the aggregate analysis of all work-related hazards that resulted in high-consequence injuries. The
280 guidance also explains that if an incident is under investigation, this can be stated in the report. The same
281 revision has been made to Disclosure 403-3 on work-related ill health.

282 **d) Reporting on safety hazards**

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

289 *GSSB response:* The disclosure has been revised to cover work-related hazards that pose a risk of high-
290 consequence injury if not controlled, even when there are control measures in place. In addition, the
291 disclosure has been revised so it does not require a list format. The same revision has been made to
292 Disclosure 403-3 on work-related ill health.

293 **e) Reporting the types of work-related injury**

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

295 *GSSB response:* A requirement to report the ‘main types of work-related injury’ has been included in
296 Disclosure 403-2, which is consistent with the same requirement in Disclosure 403-3 on work-related ill
297 health, and examples have been provided in the guidance.

298 **f) Methodology for calculating injury rates**

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

303 *GSSB response:* Disclosure 403-2 has been modified to permit the use of either 200,000 hours worked or
304 1,000,000 hours worked for calculating the injury rates; and requires the organization to state in the report
305 which of the two options it has used.

306 **g) Rates vs. absolute data**

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

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

315 **Disclosure 403-3 Work-related illnesses**

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

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

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

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

330 *GSSB response:* It is acknowledged that accurately capturing work-related illnesses/ill health is a challenge.
331 However, this is not dependent on the status of the worker (whether an employee or not an employee,
332 temporary or long-term, present or former), but on the complexity of diagnosing the illness/ill health,
333 determining whether the illness/ill health is work-related, and whether the organization gets notified of the
334 illness/ill health. Despite these challenges, whenever the organization identifies or is notified of a work-related
335 illness/ill health (for either an employee or a worker who is not an employee, but whose work and/or
336 workplace is controlled by the organization), it should be required to report it. Therefore, these requirements
337 have been maintained, and additional guidance has been developed on how to report work-related illness/ill
338 health.

339 Disclosure 403-4 Workers' access to occupational health services

340 **a) Specificity of the disclosure and additional content suggested**

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

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

351 Additionally, this disclosure has been moved to the Management approach disclosures section, as it relates to
352 how occupational health services are managed.

353 Disclosure 403-5 Worker health promotion

354 **a) Distinction between occupational health and safety and non-work-related health 355 promotion**

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

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

367 **b) Specificity of the disclosure and additional content suggested**

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

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

375 Additionally, the contents of this disclosure have been moved to the Management approach disclosures
376 section, as they relate to how worker health promotion is managed.

378 *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>

379 2. Overview of respondents

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

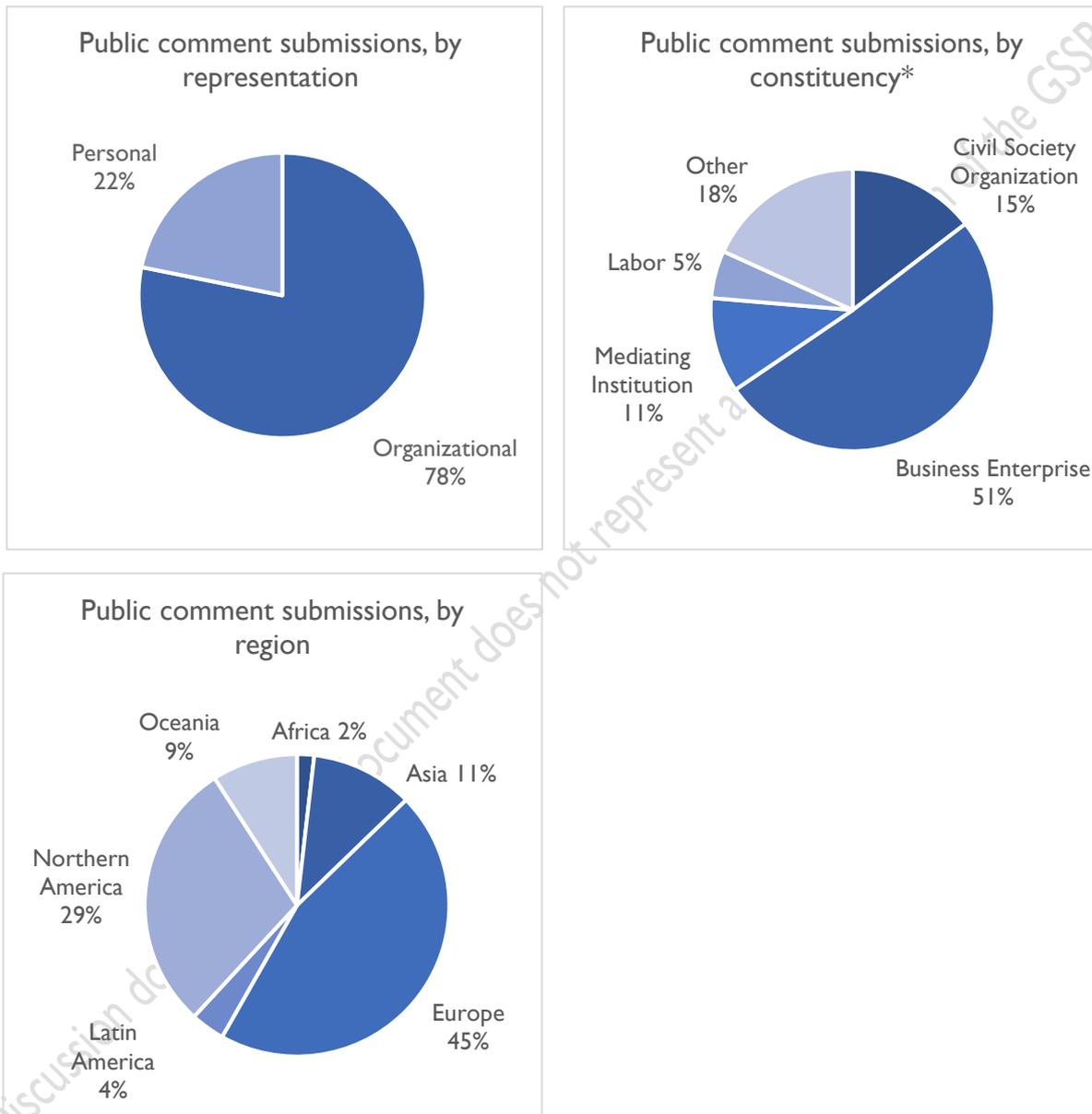
First name	Last name	Representation	Organization	Country	Region	Constituency
Dianah	Brown	Organizational	Safe Work Australia	Australia	Oceania	Other
Leonore	Adams	Organizational	Amcor Limited	United States	Northern America	Business Enterprise
Habiba	Al Marashi	Organizational	Arabia CSR Network	United 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

382 **3. Public comment submissions by**
 383 **representation, constituency, and region**

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



386 *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

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