



Center for
**Safety & Health
Sustainability**

Response to Exposure Draft of SRS:603: Occupational Safety and Health from the Global Sustainability Standards Board

Introduction

The Center for Safety and Health Sustainability (CSHS) was founded with a core mission of ensuring and facilitating reporting of safety and health data. We have long supported the excellent work of GRI and look forward to collaborating to advance the presence of safety and health requirements in GRI standards. To this end we are pleased to comment on the Exposure Draft of SRS: 603: Occupational Safety and Health from the Global Sustainability Standards Board (GSSB). Our key comments were made on the online system and we share this white paper to further expand on those comments made on our behalf by Alan Leibowitz, one of our Board members.

CSHS represents over 100,000 OHS professionals in over 70 countries. Officially launched in June 2011, CSHS is a 501(c)3 nonprofit organization committed to advancing the safety, health and sustainability of the global workplace.

Summary Position

CSHS has long participated in GRI and is a member of the GOLD community. While we are pleased to see progress regarding inclusion of safety and health issues in GRI standards there is still a significant deficit in this important area. In particular, discussion of safety management systems and supplier safety assessments are missing. We are also concerned that the standards do not address the reality of small or mid-sized organizations – especially in relation to worker consultation and engagement. The requirement for a committee is not necessarily reasonable for such entities and could discourage well-intentioned/performing operations from participating in GRI.



CSHS Detailed Comments

In the comments that follow, our suggested changes are italicised and underlined. We close with an extract from CSHS guide on OHS in sustainability reports.

SRS 603: Occupational health and safety

Line 117 - Participation can be by means of *individual interaction*, properly and independently elected worker health and safety representatives, and through worker members of joint management-worker health and safety committees.

Line 167 - 2.1 The reporting organization shall report the following information for Disclosure 603-1: Disclosure 603-1 a. The level at which each formal joint management-worker health and safety committee typically operates within the reporting organization *or how worker participation is ensured in the absence of such a committee*.

Line – 184 - 2.3 The reporting organization shall report the following information for Disclosure 603-2: 185 Disclosure 603-2 ... c. The system of rules applied in recording and reporting accident statistics *including the formulas used in the rate calculations*.

We also suggest the addition of two metrics which relate to implementation of OHS management systems;

3. *% of owned or leased manufacturing, production, or warehousing facilities that have implemented an OHS management system that meets nationally or internationally recognized standard or guideline.*
4. *% of owned or leased manufacturing, production, or warehousing facilities that have had their OHS management systems audited.*

SRS 508: Supplier environmental assessment

We recommend renaming the section and all references to include OHS and environmental impacts. Specifically;

Page 1, Title SRS 508: Supplier environmental *and safety* assessment

Page 10, lines 103-103: environmental *and safety*

Page 10, lines 123-123: environmental *and safety*

Page 12, lines 154-154: environmental *and safety*

Page 12, lines 161-161: (500). Safety criteria can include topics in the Occupational health and safety (SRS 603)

Page 13, lines 168-168 environmental *and safety*

Page 8, lines 42-42: environmental *and safety*

Page 8, lines 43-43: environmental *and safety*



Page 8, lines 45-45: environmental *and safety*

Page 8, lines 44-44: environmental *and safety*

Page 8, lines 47-47: environmental *and safety*

Page 9, lines 83-83: environmental *and safety*

Page 9, lines 90-90 environmental *and safety*

“To advance the standardization of suitability reporting practices, CSHS recommends five minimum reporting requirements.”

Excerpt from the CSHS guide:

OSH PERFORMANCE METRICS

Center for Safety and Health Sustainability OHS Performance Metrics

To advance the standardization of sustainability reporting practices, CSHS recommends the following minimum performance reporting requirements:

1. Lost-time injury and illness frequency rate, lost-time injury and illness severity rate, and number of fatalities (all employees/workers – 5 year period).
2. Lost-time injury and illness frequency rate, lost-time injury and illness severity rate, and number of fatalities (all contractors – 5 year period).
3. % of owned or leased manufacturing, production, or warehousing facilities that have implemented an OHS management system that meets nationally or internationally recognized standard or guideline.
4. % of owned or leased manufacturing, production, or warehousing facilities that have had their OHS management systems audited.
5. % of direct/first tier suppliers’ facilities that were audited for compliance with OHS standards.

Definitions:

Employee/worker – A person who is subject to the control of the organization’s management for the performance of work duties, including contract workers and temporary workers.

Contractor – External person(s) providing services to an organization at a workplace in accordance with agreed specifications, terms and conditions.

Lost-time injury or illness – A nonfatal occupational injury or illness that causes a loss of time from work beyond the day or shift it occurred.

Lost-time injury and illness rate – The number of lost-time injuries and illnesses per million hours worked, calculated using this formula: (Number of lost-time injuries and illnesses x 1,000,000)/Total hours worked in accounting period.

Lost-time injury and illness severity rate – The number of days away from work due to workplace injury or illness per one million man hours worked, calculated using this equation: (# of work days lost x 1,000,000)/Total hours worked.

OHS standards – Standards required by contract with the supplier, pursuant to an agreed upon Supplier Code of Conduct, or by relevant local law or regulation.



References

1. Center for Safety and Health Sustainability. *CSHS best practice guide for occupational health and safety in sustainability reports*. Park Ridge: CSHS, 2016.
www.centershhs.org/assets/docs/CSHS_Best_Practice_Guide_Final.pdf
2. Center for Safety and Health Sustainability. *Current practices in occupational health and safety sustainability reporting*. Des Plaines: CSHS, 2013.
<http://viewer.zmags.com/publication/cc7e8078#/cc7e8078/1>
3. Center for Safety and Health Sustainability. *The Accounting Revolution and the New Sustainability: Implications for the OSH Professional*. Park Ridge: CSHS, 2015.
www.centershhs.org/assets/docs/CSHS_2015_Accounting_Revolution_and_the_New_Sustainability.pdf
4. Center for Safety and Health Sustainability website www.centershhs.org

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CSHS provides over 100,000 occupational safety and health professionals in over 70 countries with a stronger voice in shaping sustainability policies. Officially launched in June 2011, CSHS is a 501(c)3 non-profit organization committed to advancing the safety, health and sustainability of the global workplace.

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