FACILITY REPORTING PROJECT

Facility Reporting Project
SUSTAINABILITY REPORTING GUIDANCE
—Pilot Draft—

March 2005

Get Started and Get Better.

This *Facility Reporting Guidance* is intended to support both new and experienced reporters. Every facility is at a different stage of tracking and reporting readiness. Experienced reporters can build on what they have already done. New reporters need to figure out how to get started.

One way to start, for example, is simply reporting to the public in one document non-confidential information that a facility already reports to varied regulatory agencies.

This *reporting guidance* is designed to help you, wherever you are. It can be used as a tool for initiating and organizing discussions with community members. It can be used as a tool to invite suggestions from the workforce. It can be used by managers to get a more accurate understanding of operations.

We urge you to simply get started, commit to getting better each year, and discuss your report with your stakeholders.

Table of Contents:

On-line reporting tools available!

Visit *www.facilityreporting.org* for:

- **"Getting Started With Facility Reporting and Stakeholder Engagement**."

  This tool will help you identify stakeholders, assess the applicability of performance indicators and develop a plan for a facility report.

- **A workbook-style report form** that you may use to collect information for your report or to prepare a simple report with limited narrative and graphics.

About the FRP and the *Pilot Draft* of the *FRP Sustainability Reporting Guidance*

This draft guidance for facility-level sustainability reporting is the product of the Facility Reporting Project (FRP). The *Pilot Draft* reflects extensive stakeholder comments received on the June 2004 *Public Comment Draft.*

In 2003, Ceres and the Tellus Institute jointly launched the FRP as a multi-stakeholder effort to develop **consistent, comparable,** and **credible** economic**,** environmental and social reporting guidance for individual facilities in the United States. Major initial funding was provided by the Joyce Foundation of Chicago; additional funding has been provided by the Multi-State Working Group on Environmental Performance (MSWG).

Ceres and Tellus serve as the Secretariat of the FRP. The FRP Secretariat developed this Draft Reporting Guidance through a thorough, representative multi-stakeholder process involving report makers, report users, and other experts drawn from large and small businesses, civil society organizations, trade unions, and investors across the United States.

Before deciding that the Global Reporting Initiative's (GRI) *Sustainability Reporting Guidelines* for organization-level reporting provided the best "compatibility standard" for facility reporting, the FRP Secretariat and Steering Panel reviewed a variety of facility reporting frameworks and indicator sets. The GRI *Sustainability Reporting Guidelines* is emerging as the generally accepted sustainability reporting standard at the organization level. They were developed and are being implemented by a multistakeholder process.

The FRP has consulted closely with the GRI regarding the fit between facility level guidance and the *Sustainability Reporting Guidelines*. This Draft FRP Guidance is not a GRI product, however.

The FRP believes that its *Sustainability Reporting Guidance* will strengthen facility accountability to civil society and other facility stakeholders by enabling them to report their economic, environmental and social performance to the public in a credible, comparable and consistent manner. We also hope that this reporting guidance will help drive performance improvement at the facility level, serve as a useful tool for companies seeking to gain external value from their environmental management systems and enhance the credibility of performance-focused regulatory programs.

This *Pilot Draft* of the Guidance will support pilot testing in which facilities will evaluate the Guidance in the course of utilizing it to develop facility sustainability reports. We welcome inquires from prospective pilot-testers, and continue to welcome comments from all interested parties. A form for comment is available at the end of the *Reporting Document* and for separate download at www.facilityreporting.org

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PART I:
Introduction and Orientation

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Introducing the *FRP Reporting Guidance*

The *FRP Reporting Guidance* is a tool to support facilities (and their parent organizations) in voluntary, public reporting of facility-level sustainability performance information. It consists of *indicators* (or metrics) for use in reporting sustainability performance and *guidance* to assist in the reporting process.

Organization-level sustainability reporting is becoming a basic expectation for larger corporations and institutions. Facility reporting is a complement to organization-level reporting, with significant benefit to society, the larger organization, and the individual facility. Facility reporting and organization-level reporting have important differences. This *Reporting Guidance* has been developed to accommodate those differences, and at the same time afford maximum compatibility with the organization-level *Sustainability Reporting Guidelines* issued by the Global Reporting Initiative in 2002.

This Pilot Draft of the *Reporting Guidance* is intended to support pilot testing by both new and experienced reporters. Organizations using the *Reporting Guidance* may or may not already be engaged in corporate- or organization-level sustainability reporting.

While this *Reporting Guidance* is potentially globally applicable, this version has been written primarily for a U.S. audience, with reference to familiar U.S. regulatory terminology, for ease of use by those new to reporting.

To enhance the future value of the *Reporting Guidance*, the FRP secretariat would appreciate knowing about its use. Please let us know if you are using the *Guidance* and have suggestions for its improvement. The FRP secretariat is available to offer implementation assistance.

What do I find in Part I?

This section presents:

- Key definitions: "facility" and "sustainability performance."

- The differences between facility-level and organization-level sustainability reporting.

How the *FRP Reporting Guidance* can help you:

The *FRP Sustainability Reporting Guidance* is a tool to help facilities report their sustainability performance to the public .

As such, it helps facilities and their parent organizations to:

- Strengthen community relations

- Pursue performance-focused regulatory arrangements

- Gain external value from an environmental management system

- Align facility reporting with the organization- level reporting guidelines of the Global Reporting Initiative.

The FRP Guidance is *not*:

A code of conduct.

A set of performance standards (e.g., emissions targets for specific pollutants).

A management system.

A guide to internal data management, data collection, or to monitoring and verification.

A substitute for legally mandated reporting.

- The benefits of sustainability reporting at the facility level: improving internal operations and stakeholder engagement.

- The need for a commonly-accepted facility reporting standard.

- The relationship between the *FRP Reporting Guidance* and the Global Reporting Initiative's *Sustainability Reporting Guidelines*.

- Determining a facility's starting point for reporting.

What is "sustainability performance?"

"Sustainability performance" refers to the economic, environmental and social performance of a facility.

The *FRP Reporting Guidance* contains indicators for economic, environmental and social performance. These indicators are contained in Part III of this *Reporting Guidance*. They are summarized below.

Overview of the FRP's Sustainability Indicators	
Major Category	**Sub-category**
Economic Indicators	Payroll
	Taxes
	Donations
	Infrastructure investment
Environmental indicators	Materials
	Energy
	Water
	Biodiversity
	Emissions, Effluents & Wastes
	Compliance
	Overall
Social Indicators	Labor Practices & Decent Work
	Human Rights
	Society

Note that *economic performance* is not identical to *financial performance:*

- Financial indicators focus on measuring assets, revenues, costs and liabilities for the purpose of informing management and shareholders.

- In facility reporting, economic sustainability indicators focus on *how the facility contributes economically to the community in which it operates (in payroll, taxes, donations, procurement, etc.)*

What is a facility?

In this guidance, "facility" is broadly defined. "Facilities" include, but are not limited to, sites and installations focused on extraction, processing, manufacturing, research and development, and service operations. These sites and installations may be owned by the private sector, government, educational, or other institutions.

Therefore, "facilities" include private sector manufacturing plants. But "facilities" also include mines, university campuses, railyards, tank farms, hospitals, utility plants, ports, waste transfer stations and other physical installations.

Defining your facility is an important first exercise in using this guidance. Facilities should consider their unique physical and activity boundaries. Consult with stakeholders to ensure local impacts of the facility are included in the definition of the site.

This reporting guidance is applicable to all facilities.

What is the difference between facility-level and organization-level sustainability reporting?

Facility-level and organization-level sustainability reporting are complementary, but they are not identical.

Voluntary sustainability reporting was pioneered at the level of the *organization.* Organization-level sustainability reporting is becoming a basic expectation for larger corporations and institutions; more than two thousand companies worldwide are now producing corporate-level environmental or sustainability reports.

However, *local needs are often not met by organization-level reporting,* Reporting on corporate-wide emissions reductions or water conservation programs may provide some context about a company's priorities and progress, but has limited value for local stakeholders—communities, workers, NGOs, local government leaders and regulatory agencies—interested in site-specific impacts and accomplishments.

Ideally, facility reports:

- Present performance data and discuss impacts that are relevant locally as well as a wider geographic scope

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"Getting Started With Reporting and Stakeholder Engagement" Electronic Workbook Available

Visit www.facilityreporting.org to download "**Getting Started With Facility Reporting and Stakeholder Engagement.**" Use this workbook-style tool to help:

- Identify the audience for your report (also known as "stakeholders").

- Assess applicability of performance indicators.

- Develop a plan for a facility report.

Why report to the public in addition to regulators?

Much of the information included in the FRP about facilities' sustainability performance is information already reported to regulators (e.g., discharge monitoring reports, annual TRI reporting, etc.)

However, this information tends to be difficult for non-specialist users to find and use to understand community-level impacts.

Ideally, a facility report provides this information in a language that makes sense to non-technical, community audiences.

- Convey the scale of facility operations and scope of decision-making

- Strengthen environmental management systems, so that they provide internal value and enhance community relations and trust

- Accommodate legitimate corporate security, competitiveness and privacy concerns of disclosing facility-level data

See Annex B for a more detailed discussion of differences between organization-level and facility reporting.

"The facility reporting project will provide a way to track employee dedication, manufacturing quality and collaboration in the plants and in the communities. The process can also provide information for better analysis of brownfield redevelopment. The people of Ford need to be continuous responsible members of the communities in which we operate. This will be of great help."

David Berdish-
Corporate Governance Manager,
Ford Motor Company

What are the benefits of facility-level reporting?

Like organization-level reporting, facility-level reporting requires an investment in time and effort, but can have significant benefits.

The two major benefits to a facility engaged in this level of reporting are *improving internal operations* and *improving stakeholder relations and engagement.*

Facility-level reporting improves internal operations

Facility-level sustainability reporting…

- Helps identify opportunities for saving energy, water, materials, and money.

- Helps identify opportunities for waste minimization and reuse.

- Helps identify and address risks, potentially lowering facility costs.

- Adds rigor to internal data gathering and information systems (including environmental management systems) to ensure facilities have the baseline information necessary to measure and drive continuous improvement in their operations.

- Facilitates opportunities to benchmark environmental and social performance against other entities.

- Promotes organizational learning by making linkages across typically independent functions within a facility more apparent, such as finance, quality control, procurement, facilities, environmental and safety compliance, etc.

- Opens value-generating internal conversations that would not otherwise occur.

- Increases employee awareness of sustainability issues, and has the potential to enhance staff morale and attract new staff.

Facility-level reporting improves external stakeholder relations and engagement

Facility level reporting…

- Helps strengthen partnerships and build trust with local communities, regulators, suppliers and customers.

- Supports proactive engagement with community regulators.

- Supports supply-chain performance reporting expectations.

- Positions a facility to take advantage of performance-focused, regulatory approaches.

- Sharpens management's ability to assess a facility's positive and negative impacts on the local community.

- Provides advance warning of potential liabilities and performance problems, and highlights "triple bottom line" opportunities.

- Helps a company achieve external value from its environmental management system.

Facility-level reporting may not deliver all these benefits to each facility. But experience indicates that *every* facility undertaking such reporting will realize at least some of them.

Why use a facility reporting standard?

The internal and external benefits of facility-level sustainability reporting discussed above require reporting to a credible and widely accepted standard. This is true for at least three reasons:

- Without a standard, any facility or organization wanting to report must devote significant effort to devising a reporting scheme and format from scratch, *significantly increasing time and effort*

- Ad hoc reporting significantly *reduces* credibility with external stakeholders because it begs the question of why certain information was reported and some was not, and why metrics were constructed in a particular way. Without a standard, reporters have little proof that they are *not* "greenwashing" their performance.

- The broader benefits of reporting to society are most likely to be realized when reporting is accessible, sufficient, comparable and

interpretable—all attributes that a standard strongly supports, and difficult to achieve in its absence.

What is the relationship between the FRP and the Global Reporting Initiative?

As discussed above, organization-level reporting standards cannot be applied at the facility level in a straightforward manner. The FRP seeks, through a multi-stakeholder process, to create a commonly accepted facility-level sustainability reporting standard.

The *Sustainability Reporting Guidelines* developed by the Global Reporting Initiative (GRI) are emerging as the generally accepted reporting standard at the *corporate* or *organization* level. The GRI *Guidelines* are the result of an extensive, ongoing multi-stakeholder process to create a common framework reporting the economic, environmental, and social impacts of organizations, including corporations.

Facility-level and organization-level reporting are complementary *in principle*. For multi-facility organizations, they are complementary *in practice* if information collection at the facility level serves the needs of both organizational- and facility-level reporting.

For this reason, the FRP made an early decision to make its facility-level guidance as compatible as possible with the GRI's organization-level standard. FRP thus:

- adopted the GRI's *Reporting Principles* and

- made its reporting *indicators* as compatible as possible with those of the GRI.

The FRP has consulted closely with the GRI organization in adapting the GRI guidelines for facility-level use. The FRP and the GRI will continue to explore whether and how the FRP Guidance may be integrated into the GRI reporting framework and portfolio of documents in the future. However, the FRP and GRI are separate, independent entities, and the *FRP Reporting Guidance* is not a GRI product.

The relationship between GRI and FRP indicators is set out in Annex A.

Differences between the GRI's *Sustainability Reporting Guidelines* and the FRP Guidance

Users of this document familiar with the GRI's *Sustainability Reporting Guidelines* will note that:

- A number of GRI indicators are not incorporated in the FRP *Guidance.* They were determined to have limited meaning or relevance at the facility-level.

- Some GRI indicators were combined and new indicators created for the FRP to address specific *facility-level* concerns.

- The language of some of the GRI indicators has been modified to reflect the *local context* of facility reporting.

For more information about the GRI, visit www.globalreporting.org

Determining your facility's starting point for reporting: Three typical situations

How you approach the process of organizing and preparing a facility report will be affected by your facility's reporting and environmental management experience, and by whether your facility is part of a larger organization. Here are three typical situations:

1. **Your parent organization is already producing an organization-level report based on the Global Reporting Initiative** *Sustainability Reporting Guidelines.*

   This guidance will help you produce a facility report that is complementary to your company's organization-level GRI report. How FRP indicators correlate with GRI indicators is noted throughout the workbook document, and in Annex A.

2. **Your parent organization does not produce a public environmental or sustainability report, but you would like to produce a stand-alone facility report.**

   This guidance will provide step-by-step guidance for producing your facility report. However, if you need more guidance to characterize the organization's business strategy and its influence on the facility, you may wish to refer to the GRI *Sustainability Reporting Guidelines*, Part C. In particular, see:

   Section 1. Vision and Strategy
   Section 2. Profile
   Section 3. Governance Structure and Management Systems

3. **Your facility is the primary site/operation of the organization and will be producing a stand-alone facility report.**

   This guidance will provide step-by-step guidance for producing your facility report. However. another resource you may find helpful is the GRI's *"High 5! Handbook."* This is a "beginner's guide," with practical guidance aimed at first-time reporting by smaller businesses. It is available on the GRI website at www.globalreporting,org.

How do I get started?

Turn the page. Parts II–IV will take you step-by-step through the reporting process. Use the self-assessment tool "Getting Started With Facility Reporting and Stakeholder Engagement" to help identify and engage stakeholders, assess applicability of performance indicators and develop a plan for a facility report. Download the tool at http://www.facilityreporting.org

What if a facility already has an EMS?

The growing popularity of environmental management systems (EMS) represents a sea change in how leading organizations undertake internal management of their environmental affairs.

Some organizations are now taking the next step, using their EMS to deliver measurable and reliable value to audiences outside the plant fence.

The FRP Guidance is a tool that will be especially useful for EMS users looking to build credibility with external stakeholders as well as those looking to gain practical advice on how environmental management systems and reporting efforts are designed and implemented to deliver desired outcomes.

As such, this guidance is complimentary to, and can be used in conjunction with, "*The External Value Environmental Management System Voluntary Guidance: Gaining Value by Addressing Stakeholder Needs*," developed by the Multi-State Working Group (MSWG) on Environmental Performance.

To use the FRP Guidance EMS users should identify which of the three situations described on this page best describe them and follow the associated directions. EMS users will need to examine the FRP metrics (set out in Part III) and determine how their internal performance measurement systems relate to these metrics.

PART II
GETTING STARTED:
Select Report Content &
Develop a Reporting Workplan

PART II
GETTING STARTED:
Select Report Content &
Develop a Reporting Workplan

This Chapter contains the information to help you get started in the facility reporting process. You will:

- Assemble your team

- Review the reporting principles

- Discuss the boundaries of your facility

- Identify your stakeholders and their interests

- Decide what to report

After this section, Part III presents the Report Content and performance Indicators. Part IV will then guide you through the actual report compilation process.

Again, the "Getting Started with Reporting and Stakeholder Engagement" tool available at www.facilityreporting.org should be useful for this process.

Assemble your team

At most facilities, reporting involves a multi-disciplinary team, typically anchored by staff whose primary role is environmental health and safety management. Reach out to engage all parts of your operation with interest in and access to performance data and or stakeholder concerns, including those who work in the following areas:

- Purchasing
- Process engineering
- Plant management
- Human resources

- Legal Affairs
- Communications
- Accounting
- Finance

It is helpful to use a more inclusive group for the "getting started" activities.

Once this is done, the report development process can proceed in several ways. A core group with responsibility for the key indicators to be covered or one that manages relationships with key stakeholder groups can take lead responsibility. Or, sustainability reporting can be integrated with other internal performance management reporting systems, serving as a dynamic tool which continually motivates sustainable practices.

Review the Reporting Principles

The credibility and usefulness of sustainability reporting depends on reporters making sound decisions about how particular indicators are calculated; which reporting boundaries are chosen, what normalization and contextual information is provided, and how easily a report can be interpreted.

Inevitably, reporters will need to make value-based judgments. At a minimum, c*redibility and usefulness* requires reporting that:

- Presents an accurate, balanced and reasonable account of economic, environmental, and social performance.

- Facilitates comparisons across and between organizations.

- Addresses issues of concern to stakeholders.

- Provides geographic detail, where relevant.

- Facilitates comparison over time.

The GRI developed and adopted its *Reporting Principles* to assist reporters in making wise value-based decisions. The FRP has also adopted these *Principles* to promote the credibility and usefulness of facility-level reporting. More information is available in Annex C.

Discuss the boundaries of your facility

Sustainability reporting at the facility level is intended to address the economic, environmental, and social impacts or "footprint" of a facility.

Some facility impacts are *direct*—e.g., jobs added by the facility, tons of waste generated. A facility may not always control all of its direct impacts; each facility is typically subject to organization-level policies that affect its performance.

Defining the boundaries of the report means to define how direct and indirect impacts are treated.

Defining boundaries is critical to achieving a reasonable and balanced picture of facility sustainability performance. Stakeholders can help with this process.

Other impacts of a facility are *indirect,* being generated by suppliers or customers—e.g., suppliers transporting raw materials or finished products or the use of a shared waste pre-treatment facility at an industrial park. The facility typically does not have full control over indirect impacts.

Defining the *boundaries* of the report means defining how both direct and indirect impacts are treated and counted. Boundaries are a central issue in achieving a reasonable and balanced picture of facility sustainability performance.

The FRP Report Content (Part III of this *Guidance)* is structured so that the reporter can provide information critical to understanding the boundaries of the report and the degree of facility control over direct and indirect impacts. In the report overview section, reporters are asked to describe:

- The degree of control the facility exercises relative to a parent organization over major labor, product design and material procurement decisions.

- The presence of key suppliers (of products and services) on-site or near the site.

- Policies, standards, and monitoring systems used to control direct impacts and influence entities that control indirect impacts.

Defining boundaries requires value judgments—by both your internal team as well as external stakeholders. External stakeholders should be involved in finalizing the reporting boundaries.

Identifying stakeholders and their interests

Stakeholder engagement is key to the credibility of a facility-level sustainability report and should embody the principle of *inclusiveness.* Feedback from stakeholders should contribute to the decisions that reporting entities make about their reports. Examples of stakeholder groups that may contribute to a report's development include:

- Employees

- Facility management

- Corporate management

- Community groups

- Labor unions

- Federal, state and local regulators

- Police and fire departments

- Local media

- Customers

Stakeholder engagement is key to the creditability of a facility-level sustainability report, and should embody the principle of inclusiveness.

Engaging stakeholders in the report development process helps to ensure that the report addresses the stakeholders' interests and information needs. There are many methods of engaging stakeholders, including:

- Public meetings
- Focus groups
- Workshops
- One-on-one interviews

- Telephone interviews
- Mail questionnaires
- Electronic questionnaires, via e-mail or website

When selecting engagement techniques, reporting entities should ensure that the engagement involves all relevant stakeholders.[1]

Decide what to report (selecting relevant indicators)

You are now ready to get started in selecting report content. Consider the following questions when you review the performance indicators with your team:

What is easy?
What is the facility already reporting for regulatory reasons, or to support organization-level reporting. Start where you are. Use what you have.

What is most important?
Use the *Reporting Principles* to help you think about important indicators, analysis, and presentation issues.

What is feasible?
What data can be provided in absolute terms (the recommended format). Would certain information be more useful if it is normalized by

> **Note for GRI Users**
>
> Readers familiar with the GRI *Guidelines* will note a major difference between the two documents:
>
> The FRP Guidance does not differentiate between "core" and "additional" indicators.
>
> The FRP *Guidance* incorporates those GRI indicators that stakeholders and research has shown are *most* relevant to the facility-level context.
>
> The total number of FRP indicators is thus significantly less than the total number of GRI Indicators.

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[1] EPA's Performance Track program has compiled a list of resources for stakeholder engagement that may be useful to FRP report preparers, at http://www.epa.gov/performancetrack/tools/outreach.htm. Another resource is the Multi-State Working Group (MSWG) on Environmental Performance "*The External Value Environmental Management System Voluntary Guidance: Gaining Value by Addressing Stakeholder Needs*", which can be found at http://www.mswg.org.

production or revenue? Are certain indicators inappropriate to report due to security or proprietary reasons?

Who has control?
Facilities may not have full control over certain impacts, due to organization-level decisions on product design, procurement, and capital investment. Sometimes you may need to consult with a contractor or supplier to characterize the facility's performance.

Are facilities expected to report on every indicator?

NO. Some reporting is better than none. It is far better to get started reporting than to never get started at all because the task seems too big. Then, commit to get better each year. Facilities that want to start reporting on an incremental basis should:

- Choose topics and indicators that are the most critical to your internal and external stakeholders. Include at least the categories of information that are already reported publicly in a regulatory context.

- Explain indicator choices and omissions, such as data availability or quality, and if no data is available on core issues, indicate when data will be available in the future.

The FRP's reporting metrics are constructed so that *together* they provide a complete picture of the performance of most facilities. *Completeness* is an essential principle of sustainability reporting, so facilities should strive to increase the *completeness* of their reporting effort over time.

In accordance reporting

Facilities that do report *completely* should be recognized for their efforts. The FRP has thus adopted the GRI's concept of **in accordance** reporting. A reporting facility that addresses every indicator in the FRP Guidance should identify its accomplishment, identifying itself as reporting *in accordance* with the FRP standard.

Facilities reporting in accordance may omit some indicators, but must give a thorough explanation any time they do so. (See box.) These facilities are also expected to provide additional content or information as needed to present a balanced picture of their economic, environmental, and social performance.

In accordance **reporting requirements**

Facilities reporting in accordance must:

1. Respond to EACH reporting metric, including the facility overview. The reporting facility can respond in one of two ways:

a. report on the indicator, or

b. explain the reason for the omission of the indicator.

2. Include any other appropriate content or indicators.

3. Cross-reference the content or the report against FRP indicators by number.

4. Certify the content of the report with the following statement, signed by the facility manager or responsible corporate officer:

"This report has been prepared in accordance with the content and principles set out in the FRP Reporting Guidance. It is a balanced and reasonable presentation of this facility's economic, environmental and social performance."

**This statement may only be used by those facilities reporting completely in accordance.

FACILITY REPORTING PROJECT

PART III:
Content of a Facility Report
and
Performance Indicators

PART III:
Content of a Facility Report and Performance Indicators

About Part III

As described in more detail in Part IV, a standard FRP facility sustainability report is structured as follows:

> A. Executive summary:
>
> B. Facility overview
>
> C. Economic indicators
>
> D. Environmental indicators
>
> E. Social indicators
>
> F. Content Index

This part specifies the content of sections A–E.

Section A: Executive Summary

In keeping with the reporting principles in Annex C, the summary should draw only on material from within the report and be materially consistent with the content of the report. The executive summary can include analysis of the indicators reported, such as highlighting identified problems, progress, and sustainability focus areas the facility has identified.

In-accordance reporters are encouraged to provide an executive summary.

Section B: Facility overview

FRP Indicator	*Corresponding GRI Indicator*

Facility profile

If the indicators in this section do not provide a full picture of the facility's operations, products, and services, reporters should include any additional information that useful to report users.

Information provided in the facility profile should include the total production, sales and employee data that would be used later in the report to create "normalized" data for particular indicators, such as "emissions per unit of product or per thousand dollars of sales revenue" or "lost work days per employee".

FOV.1. Name of reporting organization and facility

Indicate the name of the organization and the name of the facility, consistent with identifiers used in regulatory filings. For companies, indicate the parent company as well as the name of the division, subsidiary or joint venture partners involved in facility operations.

FOV.2. Major products and/or services produced at the facility, including brands if appropriate.

The reporting organization should also indicate the nature of its role in providing these products and services, such as primary manufacturing, assembly. packaging, distribution, etc. Indicate the North American Industrial Classification code if appropriate.

FOV.3. Location of the facility

Indicate local address, latitude and longitude, and county, state or regional jurisdictions.

FOV.4. Nature and term of ownership or use

Indicate whether the organization owns the land and buildings or specify term of lease or other use agreement, if applicable. Indicate how long the property has been in the current use and how long in use by the reporting organization.

FOV.5. Nature of markets served

Indicate geographic reach, i.e. local to global, and primary type(s) of customers, i.e. other businesses in a particular value chain or many sectors, individual consumers, institutional or government.

FRP Indicator	Corresponding GRI Indicator

FOV.6. Scale of the facility's operations

- Breakdown of employees by employee status (employee/contractor), employment type (full/part time), employment contract (indefinite/fixed term or temporary), and employee type (hourly/ salaried);

- indirect employees or subcontractors working on the facility (average daily, seasonal);

- net sales, revenue or budget;

- products produced/services offered (quantity or volume);

- process flow map of major processes at the facility and/or site plan with major activities identified;

- acreage of property included in the facility;

- number and type of buildings and square feet of space; percent of buildings occupied;

- any physical changes to the site since the inception of the facility's operations (e.g. development of new buildings, brownfield redevelopment onsite);

If the facility cannot provide a full picture of the facility's operations, products, and services, reporters are encouraged to disclose why categories of information are not disclosed, such as security concerns or competitive risk.

FOV.7 Physical setting of the facility:

Describe and/or present a map of the facility surroundings, such as the:

- land uses around the facility

- population density or the location of population centers

- known protected areas

- natural resources and habitat near the facility

- characteristics of the local air and watersheds

FRP Indicator	**Corresponding GRI Indicator**

FOV.8. Stakeholders

The reporting facility should identify the groups who may be interested in reading a report on the performance of the facility and communicate the availability of the information to them.

The reporting facility should also identify policies and procedures for registering community comments and feedback. Indicate how the facility relates to each group on an ongoing basis (such as with newsletters or community meetings) or if stakeholder relationships are managed centrally by the reporting organization.

Indicate how they assess the quality of these relationships (e.g., surveys or other forms of feedback).

Facility stakeholders typically include the following groups:

- neighborhood or community groups;

- workforce, direct and on-site contract employees;

- trade unions;

- local or regional business partners or suppliers;

- local, regional or state governmental authorities;

- non-profit, non-governmental organizations (NGO) that operate locally or regionally, or as field offices of national NGOs;

- major non-local NGOs with a specific interest in the facility;

- local customers (retail, wholesale, businesses, governments).

Contact information

FOV.9. Contact person(s) for the facility and the report, including telephone number and mail, e-mail and web addresses.

Report Scope

FOV.10. Reporting period (e.g., fiscal/calendar year) for information provided.

Include how many years this facility has been reporting on sustainability issues.

FRP Indicator	Corresponding GRI Indicator

FOV.11. Scope or Coverage of the Report

If the facility report does not address the full range of economic, environmental, and social indicators, state the strategy and projected timeline for providing complete coverage.

FOV.12. Significant changes in size, structure, ownership, or products/services that have occurred since the last report or in the previous 3 years.

Reporters should disclose changes that significantly effect how data is measured and reported.

FOV.13. Policies and internal practices, including external auditing verification, and stakeholder consultation, enacted to assure the accuracy, completeness, and reliability of the facility report.

FOV.14. How report users can obtain additional information and reports about economic, environmental, and social aspects of the organization's activities.

This could be provided as a website reference or a contact person for the parent organization who could provide relevant organization-wide information.

Facility/organizational context

Organization-level information (if needed): *If a facility that is part of a larger organization is producing a stand-alone report and no organizational report exists, the facility should describe its vision and strategy as well as management structure and systems as they relate to the larger organization. If a larger organization-level report exists, the facility should reference this report.*

FOV.15 Facility Management Structure

Describe the management structure of the facility, including major committees under the organizational management structure that are responsible for setting strategy and for oversight of the facility's economic, environmental, and social performance.

FRP Indicator	*Corresponding GRI Indicator*

FOV.16 Policies and Management Systems

This section should include a summary list of policies and management systems that influence operations of the facility. These include, but are not limited to:

- Organization- level policies, programs and procedures pertaining to economic, environmental, and social performance at facilities. Include discussion of priority and target setting; training; performance monitoring; internal and external auditing.

- Design for environment and product and service stewardship initiatives, particularly as they apply to facility performance

- Status of certification pertaining to economic, environmental, and social management systems, such as ISO 14001 or SA8000.

- Externally developed, voluntary economic, environmental, and social charters, sets of principles, or other initiatives (e.g., US EPA's Performance Track and Climate Wise programs)

- Principal memberships in industry and business associations, and/or national/international advocacy organizations.

FOV.17 Policies and/or systems for managing upstream and downstream impacts, including supply chain management as it pertains to supplier environmental and social performance

If these policies and systems are established at the organization-level, indicate how they are applicable to the facility.

Section C: Economic indicators

FRP Indicator	Corresponding GRI Indicator
Payroll and local procurement	
FEC1 Cost and percentage of all goods, materials, and services purchased locally.	*EC3, EC11*
Include the definition of "local" being used..	
FEC2 Total payroll and benefits (including wages, pension, other benefits, and severance payments).	*EC5*
This remuneration should refer to current payments and not include future commitments.	
Taxes and subsidies	
FEC3 Total sum of taxes, fees, and other payments paid, broken down by governmental authority (federal, state, local.)	*EC8*
FEC4 Total subsidies and government-assistant financing received (e.g., grants, tax relief, reduced interested charges), broken down by governmental authority (federal, state, local).	*EC9*
Donations	
FEC5 Donations to community, civil society, and other groups, broken down in terms of cash and in-kind donations per group.	*EC10*
Local infrastructure	
FEC6 Total spent on non-core business infrastructure development.	*EC12*
"Non-core business infrastructure" is infrastructure that does not directly serve the main business activities of the reporting entity. E,g, a a school or hospital for employees and their families.	

Section D:
Environmental indicators

FRP Indicator	Corresponding GRI Indicator
Materials	
FEN1 Total Materials use other than water, by type, including hazardous and non-hazardous materials, as defined by the US EPA. Segment materials used by type. Provide definitions used for types of materials. Report in tons, kilograms, or volume. At a minimum, hazardous materials should include all TRI-listed substances. Report actions taken to reduce material consumption.	*EN1*
FEN2. Percentage of materials used that are wastes (processed or unprocessed) from sources external to the reporting facility. *Wastes* are post-consumer recycled material and waste (non-product output) from industrial sources. Report in tons, kilograms, or volume. Segment materials by type. Report usage of other environmentally preferable materials (e.g., biodegradables, returnable packaging, etc.)	*EN2*
Energy	
FEN3 Energy use. **Report on all energy used by the reporting facility, broken down by type and source, in joules.* Include energy generated, electricity purchased and energy used for transport and travel.** Report actions taken to use renewable energy resources, increase energy efficiency, and reduce energy consumption. **If your stakeholders are more familiar with units such as BTUs, KWH, etc, also report in these accustomed units, (Free online conversion calculators are available; e.g., www.onlineconversion.com).*	*EN3, EN17, EN34*

FRP Indicator	Corresponding GRI Indicator
Water	
FEN4 Total water use in gallons. At the facility level, reporting water use is highly pertinent to characterizing the facility's local impact. Report on water use by source, such as municipal water supply, on-site wells, river outtake. Report on water use per unit of product. Report on initiatives to use renewable water resources, increase water efficiency, and reduce water consumption.	*EN 5*
FEN5. Water sources and related ecosystems/habitats significantly affected by use of water. Identify any water sources or bodies whose quantity and quality may be directly and significantly adversely affected by the facility's diversion and /or discharge of water. Note affected ecosystems and habitats.	*EN20*
FEN6. Annual withdrawals of ground and surface water as a percent of annual renewable quantity of water supply available from the sources.	*EN21*
FEN7. Total recycling and reuse of water. Water recycling and reuse is the collection of water from a discharge point (including process and cooling water discharges, storm and sanitary sewers, and runoff) and its deliberate re-direction and re-use. Express in gallons, and as a percentage of total water use.	*EN22*
Biodiversity & natural habitats	
FEN8 Define and describe the facility area. Include acreage of buildings, parking lots, other impermeable surface, and open space. Reference the physical setting of the facility (as described in FOV7). Report both the absolute impermeable acreage covered by the facility, and the net percent change in impermeable surfaces since inception of the facility's operation. Describe activities being taken to manage run-off.	*EN24*

FRP Indicator	Corresponding GRI Indicator
FEN9. Changes to natural habitats resulting from activities and operations. Identify percentage of habitat protected or restored.	*EN 26, 27*

Reference the physical setting of the facility (as described in FOV7) where applicable. Identify natural habitats bordering and within facility grounds and their status.

Report on activities for protecting and restoring native ecosystems and species in degraded areas.

Natural habitats include native ecosystems surrounding the facility. Protection includes any conservation or protection efforts of those areas. Restored habitats are formerly degraded habitats in which ecosystem function has been substantially by protection, reforestation, or other deliberate interventions.

Emissions, Effluents, and Waste

FEN10. Greenhouse gas emissions.   *EN8*

(CO_2, CH_4, N_2O, HFCs, PFCs, SF_6). Report separate subtotals for each gas in tons and in tons of CO_2 equivalent for the following:

- direct emissions from sources owned or controlled by the reporting entity

- indirect emissions from imported electricity, heat or steam

- emissions from waste sent to landfill or incineration, unless captured in FEN12

Report activities to reduce greenhouse gases and climate change impacts.

Further guidance on Greenhouse Gas reporting is available in the WRI-WBCSD Greenhouse Gas Protocol, available at www.ghgprotocol.org. If not using this protocol, note calculation method used.

FEN11. Use and emissions of ozone-depleting substances.   *EN9*

Report each figure separately in accordance with Montreal Protocol Annexes A, B, C, and E in tons of CFC-11 equivalents (ozone-depleting potential).

FRP Indicator	Corresponding GRI Indicator
FEN12. Criteria air pollutant emissions (NOx, SOx, VOCs, CO, Pb, PM), US EPA-listed Hazardous Air Pollutants (HAPs) , and other regulated (Federal, state, local) or significant air emissions by type. Includes vehicle fleet emissions for owned or leased vehicles. Also report activities to reduce air emissions.	*EN10*

FEN 13. Total amount of solid waste generated by type, its disposition, and amount stored on site prior to disposition. (specifically report hazardous waste per US EPA definition.).
 	
Solid waste is defined as all physical non-product outputs of the facility which are (1) not emitted directly to air; (2) not discharged directly to water; and (3) not re-used on-site or off-site. Waste thus *includes* materials collected for recycling. "Solid wastes" can be containerized liquids.
 	
Disposition means both (1) how the waste is treated to reduce its volume, hazard, or toxicity, and (2) to what media final disposal occurs. Not all waste is treated. Treatment techniques include (but are not limited to): composting, recycling, recovery, incineration, neutralization, compaction, shredding.
 	
Examples of *disposition*:
 	
   ▪ food wastes might be (1) composted on site and then (2) sold on the market
 	
   ▪ spent coolant might be (1) collected on site and (2) disposed to a hazardous waste landfill.
 	
In the US, reporters should include data from the facility's TRI report.
 	
Explain type of classification method and estimation method.
 	
Report on activities to reduce waste generation.
	EN11

FEN14. Amount, mode, and frequency of hazardous waste transported to and from the facility.	*EN31*

FRP Indicator	Corresponding GRI Indicator
FEN15. Significant discharges to water, itemized by type. For each discharge *type*, specify discharge volume and frequency/number, and quantify (1) hazardous and other significant discharge constituents, and (2) any significant changes to discharge versus intake water quality. Also report on activities to reduce volume and frequency of discharges to water ——— *Discharges* are intentional releases to the environment resulting from operations. Regulatory permits are often issued for discharges. Unexpected releases are defined as spills and are captured under FEN16. Discharges can be continuous, regular or episodic/intermittent. The receiving water body should be identified by name, if known. Discharge *type* is defined by the type of the receiving water body: municipal sewer, storm sewer, aquifer, lake, or stream. Discharge constituents are those compounds, chemicals and substances added to the water as the result of its utilization by or passage through the facility. All discharges subject to permit are considered significant and should be reported by type. Non point discharges—e.g., run-off—should be reported. Differences in water quality can include temperature, total dissolved solids, and dissolved oxygen. . *Further guidance on reporting discharges is available in the GRI Water Protocol, available at www.globalreporting.org.*	*EN12, EN32*
FEN16. Significant spills of chemicals, oils, and fuels in terms of total number and total volume. *Spills* are unintended releases. Significance is defined in terms of both the size of the spill and impact on the surrounding environment.	*EN13*
FEN17 Description and status of all remediation and rehabilitation projects related to the facility's activities.	*None*

FRP Indicator	Corresponding GRI Indicator
Compliance	
FEN18. List categories of environmental permits in effect at the facility and their issuing authorities. Describe the scope of these permits and how stakeholders can access them. Example categories include, but are not limited to, permits for emissions, effluents, or storage tanks.	*None*
FEN19. Incidents of and fines for non-compliance with all applicable national, state, and local environmental laws and regulations. Describe the nature and the incident and any corrective and preventative actions taken. Include resolutions of environmental-related lawsuits and consent orders.	*EN16*
Nuisance and quality-of-life	

FEN 20. Characterize the significance of and steps to mitigate issues applicable to local stakeholder concerns, such as complaints or issues related to:
 	
   ▪   Odor
 	
   ▪   Noise
 	
   ▪   Dust
 	
   ▪   Congestion (traffic)
 	
   ▪   Lighting
 	
   ▪   Vibration
	None

Section E:
Social Performance Indicators

FRP Indicator	Corresponding GRI Indicator
Labor Practices and Decent Work: Employment	
FLA1. Net employment creation at the facility, broken down by job category and full or part time. Indicate tenure of position (e.g., fixed term, temporary, indefinite) Report the net change in the number of on-site contractors. If applicable, this figure must be reported separately.	**LA2**
FLA2. Employee benefits beyond those legally mandated (e.g., health care, disability, maternity, paternity, partner, education, and retirement benefits). Breakdown by type of employee (e.g. hourly and salaried). Characterize the facility's discretion in setting benefits.	**LA12**
FLA3. Average and range of hours worked per week per employee, and per shift if applicable, by type of employee. Indicate if mandatory overtime is required.	**None**
FLA4. The ratio of average management compensation to average non-management employee compensation. Average salary of salaried and hourly employees, and the ratio of the two. Compensation includes salaries, bonuses, and the value of benefits (including stock options).	**None**
FLA5. Programs and procedures involving information, consultation, and negotiation with employees over changes in the reporting facility's operations, including monitoring systems and results of monitoring. "Changes" include changes to job descriptions, product lines, operating hours, management, and closures and layoffs.	
FLA6. Turnover in non-management positions, measured by the number of number of replacement hires divided by the number of existing positions.	**LA4**

FRP Indicator	Corresponding GRI Indicator
Labor Practices and Decent Work: Labor/Management Relations	
FLA6. Percentage of employees represented by independent trade union organizations or other bona fide employee representatives or percentage of employees covered by collective bargaining agreements. Indicate which unions if applicable.	**LA3**
Labor Practices and Decent Work: Health and Safety	
FLA7. Practices on recording and notification of occupational accidents and diseases (e.g., state if the facility is required to comply with OSHA). State how practices relate to the ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases.	**LA5**
FLA8. Description of formal health and safety agreements and joint committees comprising management and non-management representatives and portion of workforce covered by any such committees and agreements.	**LA6, LA15**
FLA9. Programs related to other health and safety issues or incident reporting (e.g. shift rotation, changes in job descriptions, or safety incentives).	**None**
FLA10. Standard injury lost day, and lost days attributed to workplace-related illness, and number of work-related fatalities (including subcontracted workers).	**LA7**
FLA11. Description of policies or programs (for the workplace and beyond) on HIV/AIDS.	**LA8**
FLA12. Description of the facility's emergency preparedness programs	**None**
FLA13. Incidents of and fines for non-compliance with all applicable national, state, and local health and safety regulations.	
Labor Practices and Decent Work: Training and Education	
FLA13. Training programs and opportunities offered to employees by type of training and category of employee.	**LA9**

FRP Indicator	Corresponding GRI Indicator
FLA14. Description of programs to support the continued employability of employees and to manage career endings.	**LA16**

Labor Practices and Decent Work: Diversity and Opportunity

FLA15. Description of the facility's equal opportunity programs or procedures, as well as monitoring systems at the facility to ensure compliance and results of monitoring. Characterize the facility's discretion in designing these policies and programs.	**LA10**
FLA16. Composition of facility's management in relation to diversity, including e.g. male/female ratio and ethnic composition.	**LA11**
FLA17. The ratio of open management and supervisory positions filled by internal advancement versus outside hire.	**None**

Human Rights

Feedback on the human rights indicators has indicated that many stakeholders view these indicators, derived from GRI indicators for global, organization-level reporting, as less relevant in the U.S. context

However, community-level and labor stakeholders remind us that these are issues of concern in certain U.S. facilities and sectors. Indicators that can be more relevant in this context include discrimination based on age, gender, sexual orientation, etc. and should be considered when determining priorities in this section.

FHR1 Describe the facility's mechanism for monitoring implementation of corporate policies dealing with all aspects of human rights relevant to operations. Describe what the facility is doing to ensure compliance with laws pertinent to human rights. Describe guidelines and procedures to deal with all aspects of human rights relevant to diversity, equal opportunity employment, safety, and operations, including monitoring mechanisms and results, including how policies are communicated to employees. Characterize the facility's discretion in designing these policies and programs. In addition, state how practices relate to existing standards such as the UN Human Rights Principles and Responsibilities for Transnational Corporations and Other Business Enterprises.	**HR1**

FRP Indicator	Corresponding GRI Indicator
FHR2. Describe employee training and goals of that training on practices concerning all aspects of human rights relevant to operations. Include type of training, number of employees trained, average training duration and whether training has effectively added value.	**HR8, HR11**
FHR3. Description of freedom of association programs and procedures and whether they are adhered to. Include any actions taken with regards to these programs and procedures.	**HR5**
FHR4 Description of programs and procedures to exclude child labor as defined by ILO Convention 138, including monitoring systems and results of monitoring.	**HR6**
FHR5. Description of programs and procedures to exclude forced and compulsory labor, including monitoring systems and results of monitoring. See ILO Convention No. 29, Article 2.	**HR7**
FHR6. Description of appeal practices and processes in relation to human rights and other workplace issues. Describe the representation and appeals process.	**HR9**
FHR7. Description of non-retaliation policy and effective, confidential employee grievance system (including, but not limited to, its impact on human rights).	**HR10**
FHR8. Description of policies, guidelines, and procedures to address the needs of indigenous people. This includes indigenous people in the workforce and in communities where the facility currently operates.	**HR 12**
FHR9. Description of the facility's workplace harassment programs or procedures, as well as monitoring systems at the facility to ensure compliance and results of monitoring. Characterize the facility's discretion in designing these policies and programs.	**HR4**

FRP Indicator	Corresponding GRI Indicator
Society	
FSO1. Description of policies, programs, and procedures to manage impacts on local communities, including monitoring systems and evaluation and/or results of monitoring. Describe environmental justice policies as they relate to disproportionately impacted groups. Facilities should document outreach programs, community development, and contributions to local communities. Include explanation of procedures for identifying and engaging in dialogue with community stakeholders, including those identified in FOV8. In consultation with both external and internal stakeholders being engaged, identify environmental justice policies, if applicable, and where impacts are disproportionate on certain communities. These communities can include ethnic, cultural and racial minorities, non-English speakers, and people with disabilities.	SO1
FSO2. Awards received relevant to social, ethical, and environmental performance.	SO4
FSO3. **Amount of money the facility paid to political parties and institutions whose prime function is to fund political parties, candidates, or their Political Action Committees.**	SO5
FSO4. Number and type of instances of non-compliance with regulations or corporate policies concerning product quality, safety, and labeling, including any penalties or fines assessed for these breaches. Include any current lawsuits, plant closings, or EHS considerations at the time of reporting as well as any decisions that have been made to address those issues. Include specific information about community involvement in these issues.	PR4, PR5, PR7

FACILITY REPORTING PROJECT

FRP

PART IV:
Producing and
Publishing the Report

Part IV: Producing and Publishing the Report

What is in this Part?

Part II of the guidance led you through the process of selecting report content and developing a reporting workplan. The next challenge is to produce the report.

This section discusses key issues that reporters commonly encounter when producing their reports:

- How should the report be organized?

- How should the report present data and information?

- How do I apply or adapt the FRP metrics to the needs of my particular facility or sector?

- How often should the report be issued? How should it be distributed and to whom?

Organizing the report

To make reports more easily comparable between facilities, facilities are encouraged to organize their report in the same order that indicators are presented in this *Guidance*. This results in the "standard" report outline presented in the sidebar.

If the report is organized differently, create a *content index* to cross-reference the content of the report against the FRP indicators, by number.

In accordance reporters are required to create a content index no matter how their report is organized.

Presentation of data and information

Use standard units. Present data using generally accepted units (e.g., pounds, tons, gallons, dollars).

Present data in per annum terms. If other timeframes are used, provide information so that per annum use can be calculated.

The standard outline for an FRP-based facility sustainability report

A. Executive summary

B. Facility overview

C. Economic indicators
(in the order presented in Part III)

D. Environmental indicators
(in the order presented in Part III)

E. Social indicators
(in the order presented in Part III)

F. Content Index

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*If the report is an *In accordance* report, the *certification statement* should appear before the executive summary. The statement reads:

"This report has been prepared in accordance with the content and principles set out in the FRP Reporting Guidance. It is a balanced and reasonable presentation of this facility's economic, environmental and social performance."

Facilities using the content and principles set out in the FRP that have not met all the expectations of *in accordance* reporters may indicate that the facility report has been prepared using the FRP Reporting Guidance.

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Examples of How to Present Data Available Online

See *www.facilityreporting.org* for specific examples of disaggregation, normalization, charts, graphs and maps to be used as guidance when determining how to present data.

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Use actual (measured) figures where possible; use estimates where necessary. Where estimates are used, explain the estimation technique. Similarly, explain uncertainties.

Identify data gaps. Describe why gaps exist and how these have been factored into the presentation of information in the report.

Present and explain trends, targets and time series data. Wherever possible, show current indicators as well as past performance trends and targets (previous and future.) Once data-gathering systems are in place, present data for the current reporting period (e.g., one year) and at least two previous periods, longer when possible. Time series and performance target information provides essential context for understanding the significance of a given piece of information. Compare with industry averages, where available, to provide useful context. Use graphs, whenever possible, to accompany the reported indicators.

Present both absolute and normalized data. Reporting facilities should present indicator data in absolute terms and use ratios or normalized data (data presented in ratios) as complementary information. Clearly define and explain the factors used to normalize data,[2] which is useful for communicating performance trends and efficiency

Determine a useful and feasible level of disaggregation. Disaggregation (separate itemization of measurement) makes the information facilities collect for reporting more useful. Disaggregated data helps reporters identify areas where sustainability problems may arise that need attention, as well as areas that are doing well, which may serve as possible models for replication. Examples of disaggregated data include separate reporting by production line, business unit, or type of operation or service.

Reporters should use caution when disaggregating, as it can increase reporting burden or raise concerns about disclosure of business-confidential information. The appropriate level of consolidation/ disaggregation is likely to vary by indicator and should be determined through consultation with stakeholders. Consistent with the *neutrality* principle, aggregation should not be used to obscure sources or periods of poor performance or adverse impacts.

Present both tabular data and graphics. For each quantitative indicator, both tabular data and graphics (graphs, charts, maps and/or photographs) should be presented. Neither type of data is a substitute for

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[2] EPA's Performance Track program has developed a guidance document for facilities to normalize their environmental data. Parts of document may be useful to FRP reporters, and can be found at http://www.epa.gov/performancetrack.

the other. In general, raw data should accompany graphical presentations, either alongside or in appendices.

Graphics should lead readers to correct interpretations of data and results. Care is therefore needed in the selection of axes, scales, and data (including conversion of raw data to ratios and indices for graphic purposes), and the use of color and different types of graphs and charts. When selecting colors and patterns for graphs, offer graphics that can be affordably replicated (e.g., black and white photocopying.)

Whenever possible, graphs should depict both trends and targets. Graphs and data tables should always clearly indicate the source of their data.

Map data where relevant and feasible. Use maps to show relevant relationships and depict changes over time.

Narrative interpretations. Reporters are encouraged to accompany graphics with narratives that objectively describe past influences on performance, actions and events likely to influence performance over the next reporting term. Narratives should also describe the facility's priorities and plans to improve sustainability performance.

Adapting and applying indicators to the needs of particular facilities and sectors

While the *Guidance* is intended to be generally applicable, the reality is that different economic and industrial sectors face different sustainability issues. The table below sets out three classes of "applicability problems" reporters may face, and how they may be addressed within the FRP *Guidance*.

Guidance applicability issue	Response
An indicator is not relevant or well-suited to the needs of the facility or sector.	Under "*in accordance*" reporting—reporting that most rigorously follows the *Guidance,* facilities can elect not to report on a particular indicator if the reason for the exclusion of the indicator is given.
Key sustainability issues faced by the sector or facility are not captured by the indicators in the *Guidance.* Such issues might be identified, for example, through stakeholder consultation.	Reporters are not limited to the indicators in the *FRP Guidance.* Under the *completeness* principle, reporters should aim to provide a balanced and reasonable representation of their sustainability performance. At a minimum, reporters should explain potentially significant sustainability performance issues not captured in the *FRP Guidance.*

It is unclear how to apply an indicator in a particular context.	Global Reporting Initiative sector supplements or technical protocols may be helpful in some cases. Explain how the indicator was calculated in a technical note.

Determining medium, frequency, and recipients of reporting

Sustainability reporting can be communicated in either or both traditional print and electronic media, and the FRP does not endorse or recommend a specific report medium. However, reporting entities should consider the following:

See *www.facilityreporting.org* for a workbook-style report form that you may use to collect information for your report or to prepare a simple report with limited narrative and graphics.

- The media chosen should be easily accessible to key stakeholder constituencies.

- While electronic media can permit "real time" or frequently updated reporting, continuous reporting should *not* replace periodic consolidated reports, vetted through an internal procedure and providing a "snapshot" of the facility at a given and representative point in time. They are important for supporting comparisons between facilities and between reports.

- Both electronic reporting and traditional print reporting have their advantages and disadvantages. For example:

  Electronic reporting can provide the ability to access more detailed information via an overview or summary document, links to outside data sources, links within the document, etc.

  Traditional print reports are available to people without Internet access, ease of scanning, and portability.

The FRP likewise does not endorse or recommend a specific reporting frequency. However, reporting entities should consider the following:

- Reporting on economic, environmental, and social performance can be timed to coincide, and possibly integrated, with other external reporting, such as annual financial reports and quarterly earnings statements. Such timing will reinforce the linkages between financial performance and economic, environmental, and social performance.

- Past reports should be available in their entirety.

- Reporting should be at least annual, although in certain situations a biennial report may be appropriate.

In some cases, stakeholder needs may require more frequent reporting, often of a smaller subset of reporting data. Reporting frequency should consider the needs and feedback of key stakeholder constituencies, including outreach and inquiries from stakeholders interested in receiving a report.

External demands for reports may decline when reporters adopt the FRP Reporting Guidance as community groups come to have greater trust in facilities reporting in accordance or moving in that direction.

Verification of Reports

Guidelines for independent verification of facility reports have not yet been developed. Until those guidelines are developed, reporters are encouraged to obtain independent verification of a facility's sustainability report in order to assess the effectiveness of internal systems and processes to provide relevant and reliable data for measuring performance. This process helps support the reliability and completeness of information in the report, but does not address the reporter's interpretations or claims about the changes in performance.

If the entire facility report or data on particular indicators has been independently verified or assured by an independent provider, the verifier's report should be published in an annex. The annex should include a clear description of the scope, methods and findings of the verification process, and the identity and contact information for the verification provider. If only summary findings are published with the facility report, indicate where the full report is available.

The GRI Sustainability Reporting Guidelines contain additional guidance about verification, credibility and assurance.

FACILITY REPORTING PROJECT

ANNEXES

Annex A:
FRP-GRI Content Index

GRI Indicator	FRP Indicator	Change Code(s)
Economic Indicators		
EC1	Profile 2.6	M
EC2	None	E
EC3	EC-F1	$C_{EC3, EC11}$
EC4	EC-F7	I
EC5	FEC2	I
EC6	None	E
EC7	None	E
EC8	FEC3	M
EC9	FEC4	M
EC10	FEC5	M
EC11	FEN1	$C_{EC3, EC11}$
EC12	FEC6	I
EC13	None	E
Environmental Indicators		
EN1	FEN1	M
EN2	FEN2	I
EN3	FEN3	$C_{EN3, EN17, EN34}$
EN4	None	E
EN5	FEN4	M_T
EN6	Profile 2.6, Profile 2.7	M
EN7	None	E
EN8	FEN10	M_T
EN9	FEN11	I
EN10	FEN12	M
EN11	FEN13, FEN14	M, R
EN12	FEN15	$C_{EN12, EN32}$, R
EN13	FEN16	I, R
EN14	None	E
EN15	None	E
EN16	FEN19	M
EN17	FEN3	$C_{EN3, EN17, EN34}$
EN18	None	E
EN19	Profile 2.17	M
EN20	FEN5	M_T, R
EN21	FEN6	I, R
EN22	FEN7	I, R
EN23	Profile 2.7	M
EN24	FEN9	M, R
EN25	Profile 2.6, Profile 2.7	M
EN26	FEN8	I, $C_{EN26, EN27}$, R

GRI Indicator	FRP Indicator	Change Code(s)
EN27	FEN8	$C_{EN26, EN27}$, R
EN28	None	E
EN29	None	E
EN30	None	E
EN31	FEN14	M, R
EN32	FEN15, FEN5	$C_{EN12, EN32}$, R
EN33	Profile 2.17	M
EN34	FEN3, FEN20	$C_{EN3, EN17, EN34}$, R, N
EN35	None	E
Social Indicators		
Labor Practices and Decent Work		
LA1	Profile 2.6	M
LA2	FLA1	M
LA3	FLA6	M_T
LA4	FLA5	M
LA5	FLA7	M
LA6	FLA8	$C_{LA6, LA15}$
LA7	FLA10	I
LA8	FLA11	I
LA9	FLA13	M
LA10	FLA15	M
LA11	FLA16	M
LA12	FLA2	M, R
LA13	None	E
LA14	None	E
LA 15	FLA8	$C_{LA6, LA15}$, R
LA16	FLA14	I, R
LA17	None	E
Human Rights		
HR1	FHR1	M
HR2	Profile 2.17	M
HR3	Profile 2.17	M
HR4	FHR9	M
HR5	FHR3	M
HR6	FHR4	M
HR7	FHR5	M
HR8	FHR2	M_T, $C_{HR8, HR11}$, R
HR9	FHR6	M, R
HR10	FHR7	I, R
HR11	FHR2	$C_{HR8, HR11}$, R
HR12	FHR8	I, R
HR13	None	E

GRI Indicator	FRP Indicator	Change Code(s)
HR14	None	E
Society		
SO1	FSO1	M
SO2	None	E
SO3	None	E
SO4	FSO2	I, R
SO5	FSO3	M, R
SO6	None	E
SO7	None	E
Product Responsibility		
PR1	None	E
PR2	None	E
PR3	None	E
PR4	FSO4	$C_{PR4, PR5, PR7}$, R
PR5	FSO4	$C_{PR4, PR5, PR7}$, R
PR6	None	E
PR7	FSO4	$C_{PR4, PR5, PR7}$, R
PR8	None	E
PR9	None	E
PR10	None	E
PR11	None	E

New FRP Indicators

None	FEN12	N
None	FEN19	N
None	FEN21	N
None	FLA3	N
None	FLA4	N
None	FLA10	N

Annex B:
Differences between facility-level and organization-level reporting

Compared to a organization-level reporting scheme, facility-level reporting must:

Emphasize local impacts. Many, although not necessarily all, of a facility's key stakeholders are local. These may include employees, local residents, local civil society organizations, and local government.[3] The local or personal character of key stakeholders has a number of implications for facility-level reporting:

- These groups have much more specific interests in a facility than professional stakeholders often do. For example, a description of an environmental management system may be of interest to corporate stakeholders, but facility stakeholders are interested in what actions have occurred because of them.

- Local stakeholders may have concerns about a variety of *local impacts* not as relevant at the corporate level, such as odor, noise, traffic congestion, and demands on and contribution to local infrastructure. (Impacts such as noise and odor that can be regulated as nuisances at the local level are not reflected in the GRI's organization-level *Guidelines*.)

- Local facility stakeholders are also interested in positive benefits to the community—e.g., economic contribution to the community in terms of salaries and taxes paid, as well as philanthropic contributions and projects.

Accommodate legitimate security, competitiveness and privacy concerns attendant to disclosing facility-level data. Organization-level data is often derived from the aggregation of facility-level data. Information that can be disclosed in aggregated form at the organization level may pose competitiveness concerns when disclosed at the facility level. For example, if a report includes information on what product mix a facility manufactures as well as what input materials are used at the facility, it might be possible for a competitor to infer proprietary information about product composition or process chemistry.

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[3] Non-local stakeholders include peer facilities, labor, environmental, and other civil society organizations, and regulatory agencies, particularly environmental leadership or other next-generation regulatory programs.

Reflect the scope of facility decision-making, Facilities possess varying degrees of authority over product design and product policy, ultimate markets served, supply chain and purchasing decisions, labor policies, and employee compensation. Authority in many of these areas is often circumscribed by or completely reserved to the corporate office. While facility-level sustainability reporting should reflect a complete picture of facility performance, it should also delineate the limits of facility autonomy—*i.e.*, where responsibility for performance lies. On balance, impacts that are both non-local and likely to be outside the control of the facility should receive less emphasis in a facility-reporting scheme, at least where organization-level reporting is also undertaken.

Focus on clarity and ease of comprehension for non-specialist report users. Overall, users of organization-level sustainability performance information are likely to be more specialized or professional information-users than critical constituency groups using facility-level information. (Community-based civil society and individual citizens, for example, typically fall into this "less specialist" class of facility-level information users.) At the same time, those responsible for actually undertaking the compilation of reporting data—largely facility-level environmental managers—are at this time less experienced *reporters* than corporate environmental offices. Clarity and simplicity of reporting *guidance* is thus likewise essential.

Annex C: Reporting Principles

The principles themselves (in bold text) are adopted verbatim from the GRI *Guidelines*. Commentary on the importance of these principles in the facility-level context has been developed by the FRP. More extensive discussions of each principle can be found in the GRI *Guidelines*.

Principle 1. Transparency

Full disclosure of the processes, procedures, and assumptions in report preparation are essential to its credibility.
Transparency requires explicit declarations of boundaries, scope, and time period of the report.

Principle 2: Inclusiveness

The reporting facility should systematically engage its stakeholders to help focus and continually enhance the quality of its reports.
Stakeholders can help a facility determine the information that is of greatest relevance to them, and to evaluate the report against stakeholder needs. Reporting effort should focus on information that is of greatest relevance to key stakeholders.

Principle 3: Auditability

Reported data and information should be recorded, compiled, analyzed, and disclosed in a way that would enable internal auditors or external assurance providers to attest to its reliability.

Principle 4: Completeness

All information that is material to users for assessing the reporting facility's economic, environmental, and social performance should appear in the report in a manner consistent with the declared boundaries, scope, and time period.

Within the declared boundaries, scope, and time period of the report, *all* information that is material to users for assessing the reporting organization's economic, environmental, and social performance should appear concisely but completely in the report.

Principle 5: Relevance

Relevance is the degree of importance assigned to a particular aspect, indicator, or piece of information, and represents the threshold at which information becomes significant enough to be reported.

Principle 6: Sustainability Context

The reporting facility should seek to place its performance in the larger context of ecological, social, or other limits or constraints, where such context adds significant meaning to the reported information.

In particular, the reporting facility should reference the community and environment in which it operates.

Principle 7: Accuracy

The accuracy principle refers to achieving the degree of exactness and low margin of error in reported information necessary for users to make decisions with a high degree of confidence.

Reported information should be sufficiently accurate for its intended use, and commensurate with facility's experience with reporting. Uncertainties should be clearly stated.

Principle 8: Neutrality

Reports should avoid bias in selection and presentation of information and should strive to provide a balanced account of the reporting facility's performance.

Boundaries, scope, and time period should not be chosen to materially distort apparent sustainability performance, particularly regarding activities over which the facility has direct responsibility or control. Reports should avoid bias in selection and presentation of information and should strive to provide a balanced account of the reporting organization's performance. Report narratives should be explanatory and objective, and explain any significant changes in performance.

Principle 9: Comparability

The reporting facility should maintain consistency in the boundary and scope of its reports, disclose any changes, and re-state previously reported information.

Information should be reported in a way that allows performance to be compared to past periods, applicable legal requirements and to its performance targets. When possible, a minimum of three years of data should be presented.

This requires maintaining consistency in the boundary and scope of its reports to the extent possible, disclosing any changes in boundary, scope, and the calculation of indicators, and presenting time series data.

Principle 10: Clarity

The reporting facility should remain cognizant of the diverse needs and backgrounds of its stakeholder groups and should make information available in a manner that is responsive to the maximum number of users while still maintaining a suitable level of detail.

To the extent possible, the reporting organization should present information in a form that a non-expert can use. However, all raw and tabular data from which charts, graphs and other graphics are constructed should be given.

In addition, the reporting media and reports themselves must be easily available to and accessible to key stakeholders. Copies of the report or information about the means for obtaining copies should be placed where stakeholders, including employees and neighbors, will be likely to find it, such as in a local library or newspaper.

Reporting should be provided in the languages(s) of the local stakeholders as well as English.

Principle 11: Timeliness

Reports should provide information on a regular schedule that meets user needs and comports with the nature of the information itself.

Special updates should be issued if and when an unexpected development of material interest to report users occur.

Annex D: Public Comment Form
Facility Reporting Project Sustainability Reporting Guidance—PILOT DRAFT

Please feel free to use as much space as needed. Send comments to:

Debra Hall
Ceres, 99 Chauncy St Boston MA 02111 USA
email: hall@ceres.org
tel   617.247.0700 ext. 22

Note: This form is available for download at www.facilityreporting.org

Reviewer information

Name:
Organization:
Contact person:
Email and Phone:

General comments

Overall Comments on the Pilot Draft (add as many lines as needed):
Key Question: How should facilities and organizations embarking on facility-reporting choose their "starter set" of indicators if they are unable to report immediately on the full set of FRP indicators?

Specific comments on report content

Section	Comments
Facility Overview	
Economic Indicators	
Environmental indicators —Materials	
Environmental indicators —Energy	