

### **Excuse me, does your Robot speak Double Dutch?**

Last Sunday afternoon the weather was magnificent in the Golfe du Morbihan and I had the great pleasure of sitting in my garden under a parasol and have a serious review of the new 'GRI Standards exposure drafts' documents.

I read my tablet with great enthusiasm as I sipped my cool glass of local cider. They are remarkable documents and I think GRI has done a superb job, redefining sustainability reporting.

Then...after about an hour it struck me that if I was a robot...I, Robot, that is, who's mission is to live and breathe 'Structured Data' (a buzz word I picked up in Amsterdam last week), I might be undergoing some serious anxiety attacks. For I, Robot, reading the GRI Standards Disclosures would be like reading Double Dutch!

There are some serious gaps between machine readable structured data and the overall arrangement of the GRI Standards Disclosures. I quickly abandoned my robotic role and resumed quaffing my cider.

I'm not sure where to begin? So perhaps a random example would be the best way to portray the robot's anxieties:

### **Here's the example taken at random:**

- srs505-emissions (Page 27)
- Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions
- Disclosure 505-7 (This is a snippet from the document - with my own notes in the right margin):

**Here's the example taken at random:**

- srs505-emissions (Page 27)
- Nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and other significant air 521 emissions
- Disclosure 505-7 (This is a snippet from the document):

521 Nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and other significant air  
522 emissions

523 **Guidance**

524 See references 5, 6, 7, 8 and 12 in the References section.

525 **Reporting requirements**

526 2.19 The reporting organization shall report the following information for Disclosure 505-7:

**Disclosure 505**

a. Significant air emissions, in kilograms or multiples, for each of the following:

- i. NO<sub>x</sub>
- ii. SO<sub>x</sub>
- iii. Persistent organic pollutants (POP)
- iv. Volatile organic compounds (VOC)
- v. Hazardous air pollutants (HAP)
- vi. Particulate matter (PM)
- vii. Other standard categories of air emissions identified in relevant regulations

b. Source of the emission factors used.

c. Standards, methodologies, assumptions, and calculation tools used.

527 2.20 When compiling the information specified in Disclosure 505-7, the reporting organization  
528 shall select one of the following approaches for calculating significant air emissions:

529 2.20.1 Direct measurement of emissions (such as online analyzers);

530 2.20.2 Calculation based on site-specific data;

531 2.20.3 Calculation based on published emission factors; or

532 2.20.4 Estimation. If estimations are used due to a lack of default figures, the  
533 organization shall indicate the basis on which figures were estimated.

534 **Reporting recommendations**

This text is sitting out on its own with no proper reference or attribute

The 'reference' field needs a home

These two codes are not properly related or synchronised.

This coding scheme is difficult to deal with in structured data. This is the current representation (G-4 XBRL) and clumsy to use.

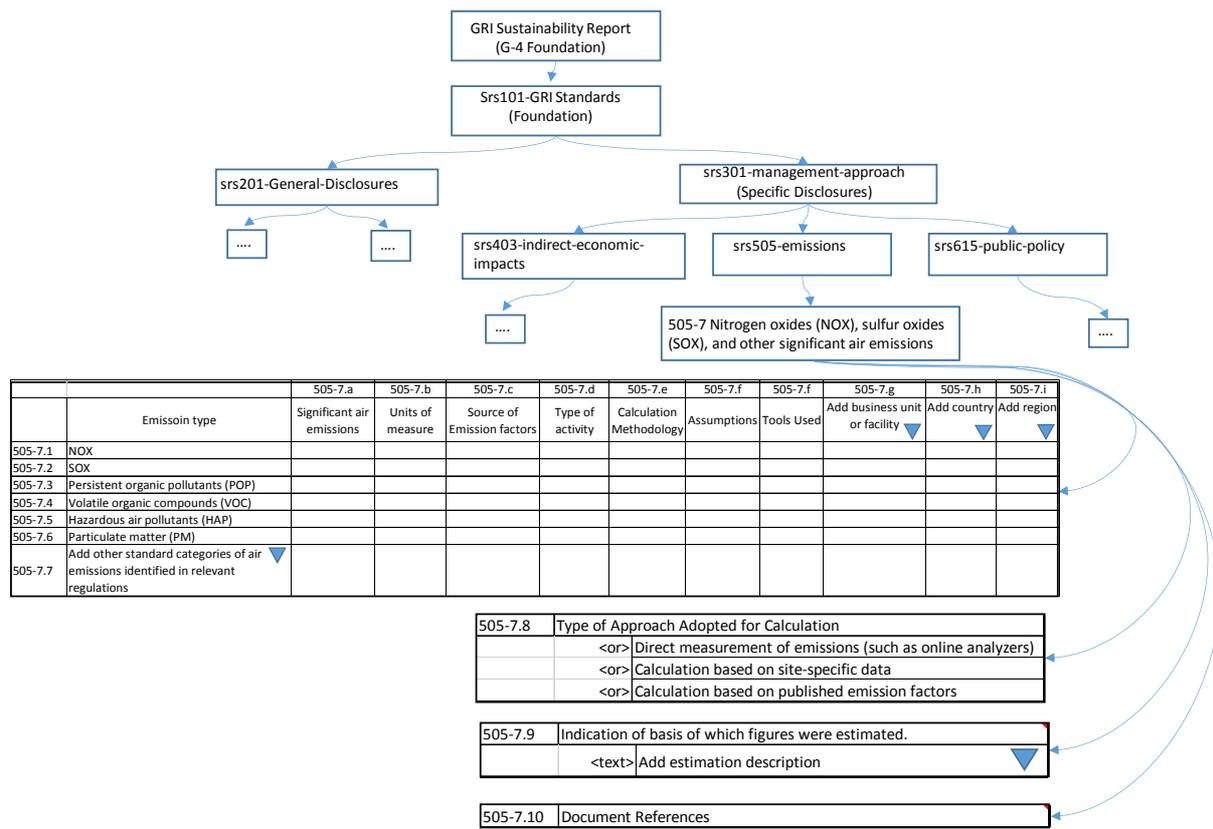
There's a bunch of stuff down there which is a mixture of 'instructions' and 'data requirements' which are not ordered in a logical or structured fashion

Please read the whole thing for yourself from the following URL:

<https://www.globalreporting.org/standards/transition-to-standards/Pages/default.aspx>

The link is somewhere on the page...

**This is how the ‘Structured Data Robot’ would like to read it (grosso modo):**



In techy language this approach is typically using the XBRL Presentation Linkbase to depict the hierarchical structure of GRI Standards and then expressing the data in tuples or tables etc. It is illustrative at this time, but I think it describes my point.

**My question is:** *Do you spot any gaps between the two?*

\* Please keep in mind that the GRI Standards documentation will have to be depicted in GRI Online when users need help creating their Structured Data Reports.

**How to bridge the gap:**

I had the pleasure of attending Professor Jeffrey D. Sachs’ lectures (University of Columbia and Special Advisor to UNSG Ban Ki-moon). He said that ‘**Backcasting**’ is an essential tool for sustainable development (see: <https://en.wikipedia.org/wiki/Backcasting>). It’s about defining a desirable future and then working backwards to identify policies and programs that will connect the future to the present. This is exactly what GRI Standards needs to do (maybe GRI folks already do, but not in the Structured Data World):

- Picture the ideal Sustainability Report(s). Ones that credit institutions, rating agencies, reporting organisations etc. etc. will trip over themselves to get hold of...the ‘killer’ report(s)!
- Then work backwards to understand how the data needs to be modelled and structured in order to achieve the results.
- After that the Standards can be modelled accordingly
- The Standards need to be almost reverse engineered into the ideal reporting framework
- Don’t forget the little guy in the corner and not just the bigshot MNC! That’s where the truly valuable data is hidden...just waiting to be ‘Structured’... the global integrated supply chain of SMCs

**Public Consultation on GRI Standards, Gibson Hall, London**

I'll be attending the Public Consultation on GRI Standards next Tuesday 7th June at Gibson Hall in London. Maybe I'll get the opportunity to ask some sensible questions?

Jiro Olcott, Managing Partner, Guard Global Ltd.