The IIRC welcomes comments on all aspects of the Discussion Paper from all stakeholders, whether to express agreement or to recommend changes. Your answers to the Consultation Questions, and any other comments you would like to make, should be submitted on this form (submitted electronically at end of document) or sent via email to dpresponses@theiirc.org.

For the purpose of analysis, you are asked to identify the organization to which you belong and where it is located. All comments received will be considered a matter of public record and will be posted on www.theiirc.org.

Comments should be submitted by Wednesday 14th December 2011.

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Type of Stakeholder (please tick one as appropriate)

- ○ Academic
- ○ Analyst
- ○ Assurance Provider
- ○ Business
- ◉ Consultant
- ○ Government
- ○ Inter-Governmental Agency
- ○ Investor
- ○ Labour Representative
- ○ Non-Governmental Organization
- ○ Professional Body
- ○ Rating Agency
- ○ Standard Setter
- ○ Student
- ○ Think Tank
- ○ Trade or Industry Association
- ○ Other, please specify below

Key Points

If you wish to express any key points, or to emphasise particular aspects of your submission, or add comments in the nature of a covering letter, then the following space can be used for this purpose.

The 2020 section of the diagram on page 7 will be better represented if the 4 smaller cogs are placed within the "integrated reporting" circle since integrated reporting encompasses these issues - in the current diagram it seems as though the issues lie outside of integrated reporting and interact with it from the outside.

The World has Changed – Reporting Must Too (page 5 of the Discussion Paper)

Q1. (a) Do you believe that action is needed to help improve how organizations represent their value-creation process? Why/why not?

Yes, since many companies still believe that their financial performance is the only (or main) indicator of their value.

Q1. (b) Do you agree that this action should be international in scope? Why/why not?

Yes, companies function in a global context. Even if company operations are local the impact of their actions and decisions have both a local and international consequences. Standards, guidelines and benchmarks are required to inform and guide company processes.

Towards Integrated Reporting (page 6 of the Discussion Paper)

Q2. Do you agree with the definition of Integrated Reporting on page 6? Why/why not?

The elements are appropriate however a succinct, comprehensive definition is required.

An International Integrated Reporting Framework (page 8 of the Discussion Paper)

Q3. Do you support the development of an International Integrated Reporting Framework? Why/why not?

Yes, sector comparisons in best practice achievements and benchmarking will be easier with an established framework that is comprehensive. However it is important to focus on "how" to achieve the fulfillment of the framework elements so that they can then be reported. The report is merely a culmination of the integration journey.

Q4. (a) Do you agree that the initial focus of Integrated Reporting should be on reporting by larger companies and on the needs of their investors? Why/why not?

Yes - larger companies have been developing sustainability reports and the evolution to integrated reporting may be somewhat easier for them. Lessons learnt through this process can be addressed in integrated reporting for the public sector and SMME's. Although it must be emphasised that these are to critical areas that are lagging behind and that their impact is substantial too.

Q4. (b) Do you agree that the concepts underlying Integrated Reporting will be equally applicable to small and medium enterprises, the public sector and not-for-profit organizations?

Yes

Business Model and Value Creation (page 11 of the Discussion Paper)

Q5. Are: (a) the organization's business model; and (b) its ability to create and sustain value in the short, medium and long term, appropriate as central themes for the future direction of reporting? Why/why not?

Yes - if "create" = low negative impact development and if "sustain" = feasibility combined with longevity

Q6. Do you find the concept of multiple capitals helpful in explaining how an organization creates and sustains value? Why/why not?

Yes - however the definitions of the various capitals require elaboration - it is currently limited and does not address key risk areas

Guiding Principles (page 12 of the Discussion Paper)

Q7. Do the Guiding Principles identified in the Discussion Paper provide a sound foundation for preparing an Integrated Report – are they collectively appropriate; is each individually appropriate; and are there other Guiding Principles that should be added? Why/why not?

The answer to this question requires face-to-face discussion.
However in brief these are SOME of the issues that need to be considered: Accountability and responsibility, more emphasis on stakeholder engagement, embedding sustainability and the integration journey, impact, assurance ....

Content Elements (page 15 of the Discussion Paper)

Q8. Do the Content Elements identified in the Discussion Paper provide a sound foundation for preparing an Integrated Report– are they collectively appropriate; is each individually appropriate; and are there other Content Elements that should be added? Why/why not?

See answer to previous question

What Will Integrated Reporting Mean for Me? (Reporting organizations – page 21, Investors – page 22, Policymakers, regulators and standard-setters – page 23, Other perspectives – page 24 of the Discussion Paper)

Q9. (a) From your perspective: Do you agree with the main benefits as presented in the Discussion Paper? Why/why not?

There are numerous benefits however from a broader integrated reporting perspective they need to be (statistically) proven to lend credibility and weight to the argument when trying to convince corporate leaders to pursue initiatives that support sustainability, corporate citizenship, etc.
Other benefits = improving quality, efficiency and effectiveness (=cost savings); improving competitiveness

Q9. (b) From your perspective: Do you agree with the main challenges as presented in the Discussion Paper? Why/why not?

Other challenges: Leadership commitment, costs and human resources, understanding the concept and implementing appropriately, assuring shareholders/boards/management that profit margins will not be negatively affected, ...

Q9. (c) From your perspective: Do you agree that Integrated Reporting will drive the disclosure of information that is useful for integrated analysis (from the perspective of investors)? Why/why not?

Investors, firstly, need to be encouraged to consider integrated analysis!! Secondly integrated reporting required a firm basis from which to be applied - for example it should be a listing requirement as is in South Africa.

Future Direction (page 25 of the Discussion Paper)

Q10. (a) Do you agree that the actions listed in the Discussion Paper should be the next steps undertaken by the IIRC? Why/why not? Are there other significant actions that should be added?

Focus on "how" to achieve the fulfillment of the framework elements so that they can then be reported.

Q10. (b) What priority should be afforded to each action? Why?

Q11. Do you have any other comments that you would like the IIRC to consider?

Additional questions: These are NOT compulsory but will help with analysis if completed

I have provided feedback that reflects:

- [x] Personal interest
- [x] Interest of an organization, please provide the name of the organization:

  Retail industry, academic reporting

Which best describes your involvement with sustainability reporting?
Please tick all that apply.

- [ ] Reporter (prepare a report for my own organization)
- [x] Consultant (report preparer on behalf of a third party)
- [ ] Assurance provider
- [x] Report reader (read reports for the purpose of evaluating or analyzing organizations)
- [ ] Other, please specify:

Please indicate how many years of experience you have with sustainability reporting:

- ○ No experience
- ○ Less than 1 year
- ○ 1-5 years
- ○ More than 5 years

Submit to the IIRC