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.

Name	Tanja de Jonge
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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.

My interest in integrated reporting is on the one hand my work as sustainable business consultant and on the other hand in my role of phd-candidate at Nyenrode Business University in the Netherland. I want to research the effect of integrated reporting on the attractiveness / reputation of organizations. Maybe it is interesting to stay in touch somehow on both progress.

Kind regards,

Tanja de Jonge

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, I do believe this. First, it is important for stakeholders to understand how an organization creates value. And what this value is (not only money).
Both positive and negative and total (sum) impact of the process on the different components of society (social, environmental and economics) needs to be clear. Most stakeholders, even investors, are giving more weight to non-financial performance in their decisions. To make it easier for them to judge on the organizations performance, integrating information in one report is a must.
And maybe it is an eye-opener for the organization itself to think in this way of its business.

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

Yes, I agree. Organizations and their stakeholders are acting more and more internationally. This is the context in which they operate and in which their performance may be seen.

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?

Two points:
1. In my opinion, by appointing the terms/concepts "commercial, social and environmental" IIRC doesn't make the step itself to integrate these to one concept e.g. sustainability. I think that strategy, governance, performance and prospects are not about commercial OR social OR environmental, but about commercial AND social AND environmental. In the explanation of their connectivity an organization shows their considerations between the dimensions of sustainability.
2. Besides strategy, governance, performance and prospects, organizations should report

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. For comparison, an international accepted framework will provide a good basis. Upon this international framework, I see possibilities for probably national, local, industry and company-specific frameworks/models.
At this moment almost every organization is developing its own framework. This is inefficient, but also has the risk of 'forgetting' material, but unpopular issues.

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, especially because at these companies the distance between stakeholders and board/management is generally greater than at SME-companies. Stakeholders of large companies are less in the possibility to directly contact with board/management to get the needed information.

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, I agree. Just like accounting standards the concept is the same, the degree of detail can vary.

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 and no.
Yes: as stated before, for stakeholders it is good to know how and what creates value in an organization. The business model expresses this.
No: the business model, as shown on page 11, is limited to the internal activities of an organization. Sustainability has a broad view on responsibilities of organizations, also in the chain (forward and backward) and in the community. How do stakeholder-issues influence the businessmodel and its output and outcomes? Is the businessmodel different if stakeholder-issues are incorporated?

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

Yes, because an organization's activities do affect multiple capitals. But do not approach them as separate capitals, they are interrelated and organizations should look at them in one concept of sustainability, see above.

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?

Yes, although 'accountability' is too much hidden in the five principles. The purpose of a report is, partly, to account for what happened last period.

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?

They seems complete to me: from holistic to performance and back to holistic.
Organizational overview: see above, business ethics, values should be reported
Operating context: capitals are not mentioned, but this is where they are mentioned as 'key' resources?
Performance: idem capitals

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?

Yes. Integrated reporting will also create new information or information that never before was available. This creates more insights, internal and external, that can lead to innovation or adjustments.
Most benefits in the category Investor Perspective counts in my idea also for other stakeholders, e.g. comparitibility, improved analysis. Some stakeholders invest money, others time or knowledge.

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

Yes.
The benefit of more or other information comprehends also the challenge to be transparent and not to loose commercial benefits.

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?

Yes, see above.

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?

Yes, especially with the pilot. Practice will show what really are issues and problems that organizations face while applying the integrated reporting framework.
Besides the pilot, a research on reports from organizations that already volantary report integrated information, including feedback from internal and external stakeholders and people who were involved in writing the report, may be useful to better understand what is realizable.

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

pilot, harmonization, governance. The framework will evolve during the process and actions mentioned. It will and should be dynamic as contexts changes rapidly and there will probably never A definitive framework.

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

I wish you all good luck in this challenging, but necessary and interesting process! I look forward to announcements on progress, calls for participating and the first glimpses of the framework.

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

I have provided feedback that reflects:

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

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)
- [x] 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