

Template for comments and secretariat observations

Date: 10-07-2008

Document: **WG SR N 143, Working Draft 26000.4.2**

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NOR MAP ME	entire document	generally	Ge	Although WD 4.2. has editorially and structurally improved compared to WDs 3 and 4.1. the contents are still demanding, technically sophisticated, logically complex and resources consuming. However, this is not a matter for large organizations and SR professionals, which will have the financial means and skills to deal with it. Unless ISO26000 gives specific simplified guidance and principles to small organizations, whether they are companies, NGOs or others, they will not be able to use it.	Refine the new structure with a view to eliminating any outstanding redundancies. Request federations or associations of organizations (like trade associations) to draft simplified manuals, adapted to location, size, sector to be used by SMOs	
NOR MAP ME	General		ge	WD 4.2 is judged to be a nightmare if to be translated in to the native languages of the participating SR experts. Its major short falls are the lack of its applicability to SMEs (Small and Medium Enterprises) who by general agreement were supposed to be the major beneficiaries of this guidance document. From an SME perspective the standard is very difficult to read. There are many topics that are difficult for a non expert to relate to their own day-to-day activities without more specific guidance. There is not enough on the economic dimension. Impacts are generally viewed as negatives; no guidance is given on enhancing the positives	It is unlikely that in its current form it will be practical for SMEs due to its length and its often unending dialogue on what is "good" and "bad"; or "correct" and "false" in our societies. SMEs do not have the time, to deal with the qualitative research of what is ethical and what is not. SMEs might find more guidance by reading the comprehensible CSR (Corporate Social Responsibility) published by most multinational corporations. It is a fact that due to the real existing differences in cultural, geographical, economical development, and legal national standings of our global societies it would only be possible to come up with a very low denominator, which would not provide the guidance envisioned at the beginning of this project.	
NOR MAP ME	General		ge		Focus drafting on assuming that SMEs with good intentions but no specific SR experience, who work both with and without a strong national legal framework, are drafting the standard.	

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NOR MAP ME	General		ge	"Complicity" and its derivatives are used throughout the document. The standard seems to try to use in in an ethical and legal sense, which is confusing to the typical SME user of the standard. This draft should not be adding to or confusing this meaning	If the term is to be used at all, it should only be in the strictly legal sense.	
NOR MAP ME	General		ge	Despite some modest attention to the matter in 7.2, there is still a strong overall impression of insufficient guidance on the manner and degree in which various types and sizes of organization should avail themselves of the mass of information and guidance provided in clause 6, each according to its reasonable needs and circumstance.	Clause 6, as the most formidable part of the standard, should if possible offer, for each core subject, a measure of guidance on the application of its contents to organizations of diverse types and sizes.	Add the following paragraph in clause 7: Particular emphasis should be given to the application of this guidance in different kind of organizations. Every implementation measure prescribed in this chapter is to be adapted to the size, nature and location of the organization. In this context, size is the most important indicator to be considered when adapting the implementation measures to the organization. The implementation of this guidance in SMOs (<i>small and medium sized organizations</i>) is subject to the following general principles: <ul style="list-style-type: none"> • Every implementation measure is to be reduced proportionally to the size of the organization. • Two or more small organizations

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						<p>operating under similar conditions are allowed to share resources in order to carry out SR implementation measures.</p> <ul style="list-style-type: none"> • If more SMOs are associated in a collective organization, they are allowed to undertake the SR implementation measures in a collective way, rather than individually, whenever it is possible according to their similarities. • Operational procedures of SMOs are typically informal, flexible and non-written. Whenever an SR implementation measure contradicts these characteristics it is to be considered not applicable to the organization. • An implementation measure is applicable to the organization only if it constitutes a solution to a real problem or concern experienced by the organization or its stakeholders.
NOR MAP	General		ge	We find the standard to be a very difficult read; it did not hold the attention. There are many high level	Specific suggestions: <ul style="list-style-type: none"> • Focus drafting on imaginary SMO leaders 	

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ME	Issue 1			topics that would be difficult for a non expert to relate to their own day-to-day activities without more specific guidance. There is not enough on the economic dimension. Impacts are generally viewed as negatives; no guidance is given on enhancing the positives	with good intentions but no specific SR experience who work both with and without a strong national legal framework <ul style="list-style-type: none"> Devote part of clause 3 on how long term concepts such as SD relate to daily activities and translate those ideas into digestible ideas Put as much high level reference as possible (e.g. Rio 15) into an Appendix.	
NOR MAP ME	2.18 Social responsibility	265	Te	Expectations of stakeholders" is an open-ended and undefined term. In combination with the current definition of stakeholders given in 2.20 will make the ISO 26000 inapplicable for the vast majority of foreseeable users, i.e. small and medium organizations. In addition, expectations is a <u>demanding term</u> that demands fulfilment of them (close to a requirement while the ISO 26000 shall not set requirements).	Replace expectations of stakeholders by views of stakeholders	
NO RM AP ME	3.3.5	413 - 420	te	Unless the organization has regard for its own sustainability it not going to be able to provide sustainable employment opportunities and to address sustainability on any wider basis. Setting too high a standard may deter organizations rather than encourage them.	Balance the "global agenda for change" with valid, more immediate considerations of particular concern to SMOs..	
NOR MAP ME	5.3.3	790		Especially SMO need to talk about the scope of their stakeholders' expectations in order to find a realistic timeframe and to single out aspects they can respond to in a credible way.	Replace phrase 790 by: Provided a relation of mutual trust an organization should dialogue with its stakeholders about what are feasible objectives	
NOR MAP ME	6.3.	911 – 1253	Ge	The chapter on human rights is very general and mainly contains the enumeration of human rights without specific explanations. Also the actions proposed are drafted in a very general way. Furthermore, the clauses address organisations as well as enterprises even though they	The chapter on human rights should differ between organisations and large and medium and small enterprises. They should define concrete actions that can be taken in order to avoid human rights violations or to foster the understanding for	

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				have different means and possibilities to address human rights issues. Due to those drawbacks, it is impossible for enterprises (and also for organisations) to know which actions they should take in order to comply with the ISO 26000.	human rights. They should be formulated in a way that makes them easy to understand even for people with no legal background.	
NOR MAP ME	6.3.7.2	1152f.	ge	The sentence as it stands is not clear: A remedy mechanism of an organisation for organisations? Besides this, most organisations are small organisations, for which a remedy mechanism is not appropriate. Thus, this qualification should be made clear.	An organization should <i>consider to</i> establish remedy mechanisms for use by <i>its stakeholder, if relevant and appropriate</i> organizations and their stakeholders.	
NOR MAP ME	6.4.1.	1257-1258	Ge	It is impossible, especially for SMEs to observe and control work performed on their behalf	The labour practices of an organization encompass all policies and practices relating to work performed within <u>or</u> by or on behalf of the organisation	
NOR MAP ME		1259-1262	Ge	It is impossible, especially for SMEs to observe and control work performed on their behalf	As such, the term extends beyond the relationship of the organization with its direct employees or the responsibilities that the organization may have at a workplace that it owns or directly controls. Labour practices include the responsibilities of the organization for work performed on its behalf by others, including subcontracted work.	
NOR MAP ME		1362 – 1372	GE	It is impossible, especially for SMEs to observe and control work performed on their behalf. Moreover the indent is in itself contradictory: "...commensurate with the degree of control that it exercises and with the potential that the rights of the workers concerned may not be respected" Delete	Not intentionally benefit from unfair, exploitative or abusive labour practices of their partners, suppliers or sub-contractors. An organization should accept responsibility for work done on its behalf by other organizations commensurate with the degree of control that it exercises and with the potential that the rights of the workers concerned may not be respected [48]. Depending on these circumstances, reasonable efforts to address these responsibilities could include establishing contractual obligations on suppliers and subcontractors; unannounced visits and inspections; and exercising due diligence in supervising contractors and intermediaries. Where suppliers and subcontractors are expected	

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					to comply with a code of labour practice, the code should be consistent with the Universal Declaration of Human Rights and the principles underlying relevant ILO labour standards (see Clause 7.6.6 for additional information about responsibilities in the supply chain); and	
NOR MAP ME		1418	Ge	What is the "best possible wage"?	provide the best possible wages and other conditions of work in accordance with national law and practice,....	
NOR MAP ME		1419-1426	Ge, Te	The whole paragraph should be more balanced and should reflect the diversity of collective bargaining systems in the different countries: e.g. in most European countries it is not at the company but at the branch level where collective agreements are negotiated.	Organizations should pay wages at least adequate for the needs in line with the productivity of workers and their families, taking into account the general level of wages in the country, the cost of living and social security benefits, and the relative living standards of other social groups, as well as economic factors, including the requirements of economic development and the desirability of attaining and maintaining a high level of employment. In reaching a balance between these concerns, the organization <u>and/or their representative federation</u> should bargain collectively with the workers;	
NOR MAP ME		1796-1801	Ed	Delete paragraph. Not capable for SME.	delete	
NOR MAP ME	6.7.5.2	2182	ge	Many organizations, especially small organisations, are very active in social responsibility for purely ethical reasons. Often these organisation do not want to publish their activities since they do not want to "advertise" with them. This concept of SR should be respected by ISO26000.	Delete lines.	
NOR MAP ME	6.8 Community involvement and	2399-2624	ge	The subject is limited to the global issue of poverty and relating social issues in developing countries, to be addressed by multi-national enterprises. These subjects may make most of the SMOs feel being far apart.	Revise the draft from the standpoint that it is important for organizations to identify, focus and proactively address the issues of local communities where they operate.	

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	development					
NOR MAP ME	6.8.7.2.	2551	ge	For many small organizations it is not feasible to contribute to food programmes. Moreover, why for instance should an environmental NGO, which receives donor money for its' environmental activities, spend this money in food programmes instead of using it for the purpose it got the money for?	<u>add: consider to</u> contribute...	
NOR MAP ME	6.8.7.2	2555-2557	ge	What is meant with "social entrepreneurship ventures"? Why should and how can a small organisation support "social entrepreneurship ventures"?	delete lines	
NOR MAP ME	6.8.8.2	2570	ge	For many small organizations it is not feasible to promote cultural activities. Moreover, why for instance should an environmental NGO, which receives donor money for its' environmental activities, spend this money for cultural activities instead of using it for the purpose it got the money for?	<u>add: consider to</u> promote...	
NOR MAP ME	6.8.8.2	2576f.	ge	For many small organizations it is not feasible to promote education at all levels and to fight illiteracy. Moreover, why for instance should an environmental NGO, which receives donor money for its' environmental activities, spend this money for fighting illiteracy instead of using it for the purpose it got the money for?	<u>add: consider to</u> promote....	
NOR MAP ME	6.8.9.2	2594f.	ge	For many small organizations it is not feasible to raise awareness about major diseases. Moreover, why for instance should a NGO which purpose is to fight corruption and which receives donor money for its' anti-corruption activities, spend this money for raising awareness about aids instead of using it for the purpose it got the money for?	<u>add: consider to</u> raise....	

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	7.5.3 Communicatin g		ge	To SMEs, this association of ‘accountability” and “credibility” with the suggestion that communication is essential does not ring as something SME’s are able to do.	Create exceptions for SMEs	
NO RM AP ME	7.X.1 Key Consideration s		Ge	The former paragraph for SMOs should be reinserted: Implementing Guidance for Small and Medium Organizations Former Clause 7.X is meant to encourage small and medium organizations to be comfortable with ISO 26000, and to understand how to implement the practical guidance of the standard with flexibility according to their size and context.	Small and Medium Organizations play a key role in the societies and economies of every country and world region. They often practice Social Responsibility as a part of their owners’ and managers’ vision of their role in the community, and often without putting a formal label on their SR activities. SMOs are an important sector for ISO 26000, as their decisions taken collectively can have a great impact on sustainable development and the welfare of societies.	

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