

PUBLIC CONSULTATION REPORT

# SA8000: 2014

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**PREPARED BY:**

**SOCIAL ACCOUNTABILITY  
INTERNATIONAL**

**JUNE, 2014**

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## INTRODUCTION

This report provides an overview of the results of SAI's Public Consultation process and its impact. The views expressed were critical in the revision of SA8000: 2014. The report summarizes the most important changes made but does not respond to each comment received. In total, more than 900 individual comments from more than 200 stakeholders were received. The full file of comments received is available on SAI's website, as well as a Side-By-Side comparison of SA8000: 2008 and SA8000: 2014.

## PROCESS ACCORDING TO ISEAL ALLIANCE CODE

The ISEAL Standard Setting Code requires that when standards are revised, interested parties have the opportunity to offer comment submissions. Furthermore, the Code requires that received comments are taken into account and compiled according to the issues raised and used to prepare a written synopsis of how each material issue has been addressed in the standard revision.

From December 18, 2013 to February 16, 2014 a public consultation process was undertaken as part of the SA8000: 2014 revision. The public consultation consisted of one 60-day round of online consultation, with the possibility of offline written responses to a questionnaire for those without reliable internet access.

SAI is confident that the revision of the standard is in line with the public's expectations due to the participation of a diverse group of stakeholders in the process, the amount of comments received and the general sentiment of the comments, most of which approved of the direction of the revision.

## SUMMARY OF INPUT METHOD

A broad range of stakeholders were notified by email and through the SAI Newsletter, discussions lists and social media channels of the opportunity to comment on the SA8000: 2014 standard. It should be noted that lessons learned from the 2008 Standard Revision were used in a serious effort to gain an increased quantity and quality of responses to our Draft. Our communications plan aimed to reach beyond the above mentioned various means, including the responsibility of named staff members for garnering the participation of each of their most relevant portion of stakeholder segments. There were mass and targeted emails, phone calls and the use of SAI's Advisory Board members in personally reaching out to their own relevant contacts.

## COMMENTS ANALYSIS

Over 91% of all respondents were, in general, satisfied with the direction of the proposal they reviewed. They were hardly as solidly joined on what chapters and provisions drew their support or critique and on what policy or language suggestion they advised.

The most comments on any SA8000 provision were received on recruitment/employment fees in our Forced or Compulsory Labor chapter. Other subject areas that garnered much attention from our public consultation respondents were the draft definitions of "supplier/subcontractor", "organisation", "SA8000 worker representative(s)" and "worker." A significant number of comments were also received on our new language on the Intent and Scope of the Standard and the roles of the Social Performance Team and Health and Safety Committee.

THE FOLLOWING TABLE SUMMARIZES **CHANGES** THAT HAVE BEEN MADE BASED ON THE MOST COMMON AND CRITICAL COMMENTS, LISTED BY PROVISION OF THE STANDARD.

Provision/Section	Subsection	Editorial change and/or minor change to requirement	Major change of requirement	New requirement
Introduction	Intent and Scope	x (this section moved up and "Management System" moved down)		
	Management System	x		
<b>II. Normative Elements and Their Interpretation</b>				
III. Definitions	Collective Bargaining Agreement	x		
	Corrective Action	x		
	Living Wage			x
	Management Representative		x (deleted)	
	Organisation	x		
	Preventive Action	x		
	Risk Assessment			x
	Social Performance			x
	Supplier/subcontractor	x		
	Sub-supplier	x		
Worker organisation	x			
IV.1. Child Labour				

IV.2. Forced or Compulsory Labour	2.1	x		
	2.3			x
IV.3. Health and Safety	3.1	x		
	3.2	x (moved)		
	3.3	x (moved)		
	3.5	x		x
	3.6	x		
	3.7	x		
	3.8	x		
IV.4. Freedom of Association & Right to Collective Bargaining				
IV.5. Discrimination	5.1	x		
IV.6. Disciplinary Practices				
IV.7. Working Hours	7.1	x		
IV.8. Remuneration	8.1	x		
	8.4	x		
IV.9. Management System	9.1.3	x		
	9.1.5	x		
	9.1.7	x		
	9.1.8	x		
	9.2.1	x		
	9.2.2	x		
	9.3.1			x
	9.4.1			x
	9.4.2			x
	9.5.1	x		
	9.5.2			x (deleted)
	9.6.1	x		
	9.8.1	x		
	9.10.1			x

x = indicates that a change was suggested and made

THE FOLLOWING TABLE SUMMARIZES CHANGES/NOTES THAT HAVE BEEN SUGGESTED TO THE **GUIDANCE** BASED ON THE MOST COMMON AND CRITICAL COMMENTS, LISTED BY PROVISION OF THE STANDARD.

Provision/Section	Subsection	Description
Introduction		
I. Purpose and Scope		
II. Normative Elements and Their Interpretation		
III. Definitions		
IV.1. Child Labour		
IV.2. Forced or Compulsory Labour		
IV.3. Health and Safety	3.3	<ol style="list-style-type: none"> <li>1. The periodicity of risk assessments should be described.</li> <li>2. The difference between the H&amp;S committee’s risk assessment and the SPT risk assessment should be clarified.</li> <li>3. Governing bylaws or terms of reference for the committee that provide guidance on terms of members, selection process, reporting mechanisms, meeting minutes with action items, etc., should be described.</li> </ol>
IV.4. Freedom of Association & Right to Collective Bargaining		
IV.5. Discrimination		
IV.6. Disciplinary Practices		
IV.7. Working Hours		
IV.8. Remuneration		
IV.9. Management System	9.1	<ol style="list-style-type: none"> <li>1. Describe communication with interested parties who request policies and implementing procedures.</li> <li>2. Regular review of policy should be discussed, including when legislation is revised.</li> <li>3. Describe reason for requiring senior management commitment. Clarify that top management/senior management are the same.</li> </ol>
	9.2	<ol style="list-style-type: none"> <li>1. SPT number of team members, regulatory measures and specific “team job description.”</li> <li>2. Need detail on how to manage the unionized vs. other facilities bit.</li> <li>3. Are management reps senior or junior? Workers from different lines, locations, shifts?</li> <li>4. What training/qualifications are required of members?</li> <li>5. Do reps need to be reelected every so often?</li> </ol>
	9.4	<ol style="list-style-type: none"> <li>1. The intensity and frequency of meeting and audits shall be described.</li> <li>2. It should be noted that monitoring includes the “Management of</li> </ol>

Suppliers and Contractors” portion of the standard.  
3. Documentation requirements and best practices shall be described.

THE FOLLOWING TABLE SUMMARIZES **CHANGES TO CONSIDER FOR THE NEXT REVISION** THAT HAVE BEEN MADE BASED ON THE MOST COMMON AND CRITICAL COMMENTS, LISTED BY PROVISION OF THE STANDARD.

Provision/Section	Subsection	Description
Introduction		
I. Purpose and Scope		
II. Normative Elements and <b>Their Interpretation</b>		
III. Definitions		
IV.1. Child Labour		
<b>IV.2. Forced or Compulsory Labour</b>		
IV.3. Health and Safety	3.3	1. Is the requirement of an H&S committee too burdensome for small companies? Should a threshold be set? If a threshold is set here, should some be set for other components? 2. Overall, the standard may be biased towards large companies – do we want to reconsider this bias?
IV.4. Freedom of Association & <b>Right to Collective Bargaining</b>		
IV.5. Discrimination		
IV.6. Disciplinary Practices		
IV.7. Working Hours		
IV.8. Remuneration		
IV.9. <b>Management System</b>	9.2	1. Is the requirement of an SPT too burdensome for small companies? Should a threshold be set? If a threshold is set here, should some be set for other components? Three commenters out of 18 said that this is too burdensome.

**STATISTICS ON COMMENTS RECEIVED**

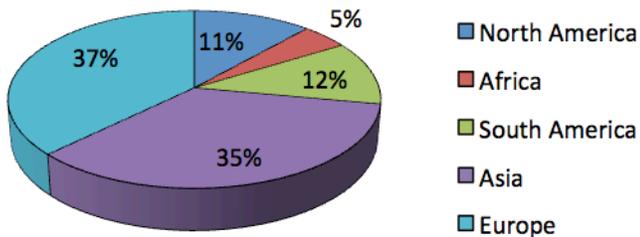
The below statistics and charts summarize the responses received during the public consultation period. The structure of the online survey was as following: each part of the standard was assigned its own question number and participants were asked to answer “Yes” or “No” to whether they approved of the proposed revision and they were also asked to add additional comments. Thus, participants were given the opportunity to comment on the entirety of the standard, from the Introduction through the Management System section.

**PARTICIPATION STATISTICS SUMMARY**

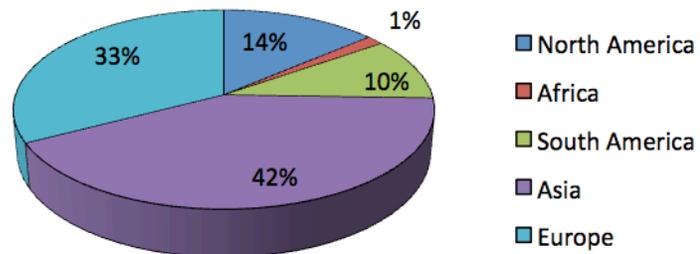
- 44 countries participated; India, China, USA, and Italy were the most highly represented, and India, China and Italy happen to have the highest number of SA8000 certifications
- 42% of the participation came from Asian countries (India, China, Bangladesh, Thailand)
- The vast majority of the stakeholders are Consultants (23%), Audit Firms (22%), and Certification Bodies (11%)
- Only 9% of the participants disagreed (said “No”) on the proposed draft, whereas 91% agreed (said “Yes”)

**GEOGRAPHICAL DISTRIBUTION**

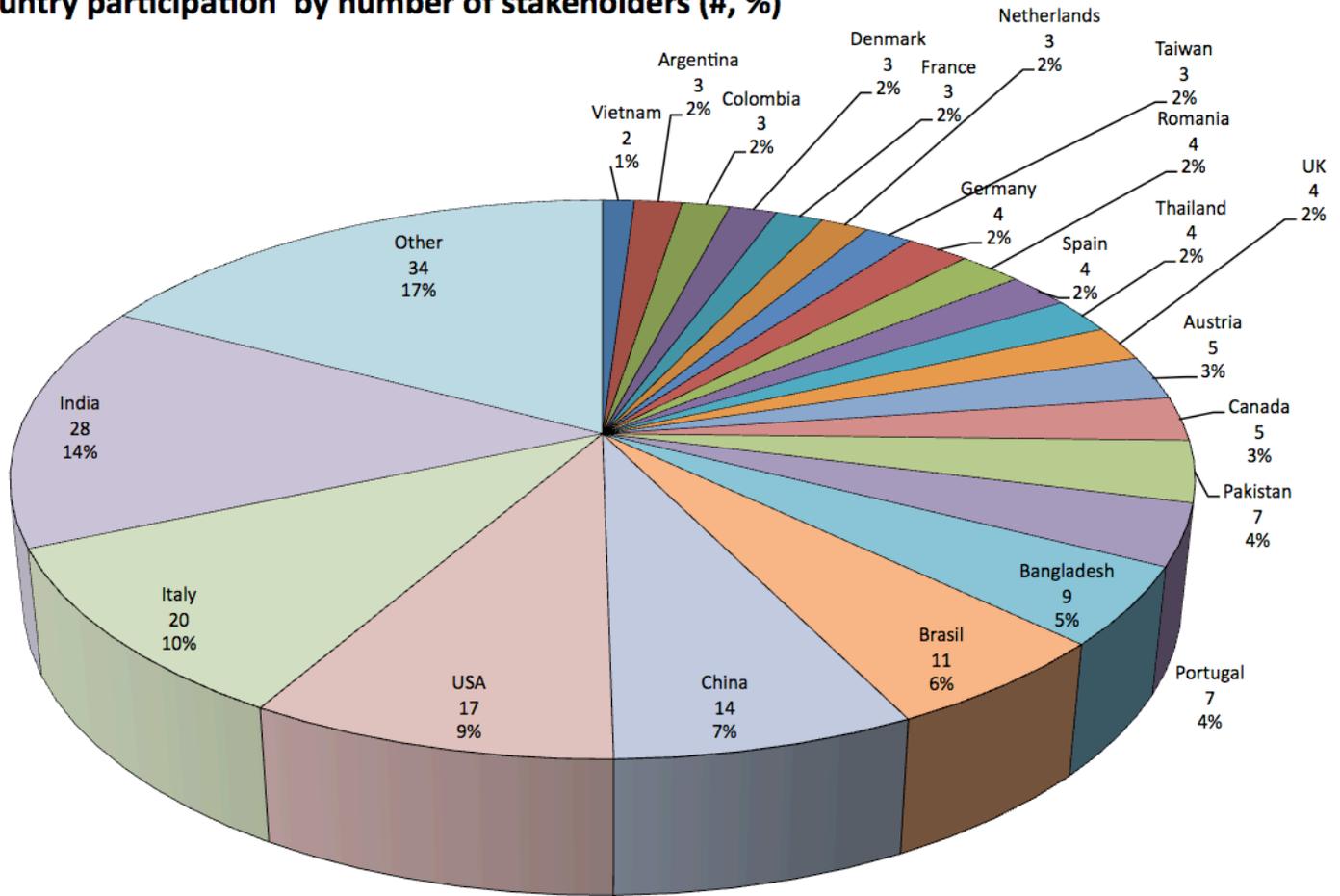
**Fig 1 Region participation by number of countries (%)**



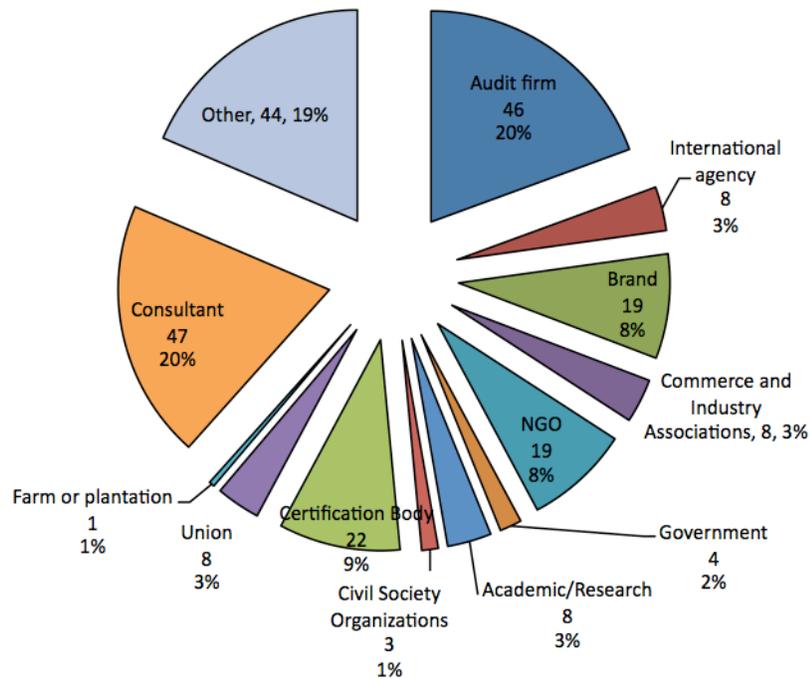
**Fig 2 Region participation by number of stakeholders (%)**



**Fig 3 Country participation by number of stakeholders (#, %)**



**Fig 4 Stakeholders distribution by sector (#, %)**



COMMENTS DISTRIBUTION

SA8000 Element	% of participants who disagreed with proposed revision
Forced or Compulsory Labour: 2.3b	34%
Forced or Compulsory Labour: 2.3a	26%
Definitions: SA8000 Worker representative(s)	17%
Definitions: Corrective action	15%
Management System: 9.1	15%
Management System: 9.2	15%
Health and Safety: 3.3	15%
Definitions: Supplier/subcontractor	15%
<b>Definitions: Organisation</b>	15%
Introduction	15%
Definitions: Corrective action	15%
Child Labour: 1.3	14%
Management System: 9.4	14%
Management System: 9.3	14%
Definitions: Worker	14%
Definitions: Preventive action	11%
Health and Safety: 3.1	11%
Management System: 9.8	11%
Forced or Compulsory <b>Labour: 2.4</b>	11%
Normative Elements and their Interpretation	10%
Definitions: Interested parties	10%
Health and Safety: 3.8	10%
Child Labour: 1.2	10%
Management System: 9.5	10%
Definitions: Sub-supplier	9%
Management System: 9.7	9%
Management System: <b>9.10</b>	9%
Definitions: Collective bargaining agreement	8%
Definitions: Child	8%
Definitions: Remediation of child labourers	8%
Management System: 9.9	8%
Health and Safety: 3.4	8%
Definitions: Worker organisation	8%
Discrimination: 5.4	8%
<b>Health and Safety: 3.6</b>	7%
Health and Safety: 3.7	7%

Health and Safety: 3.5	7%
Definitions: Personnel	7%
Remuneration: 8.4	7%
Health and Safety: 3.2	6%
Forced or Compulsory Labour: 2.1	6%
Definitions: Child labour	6%
Management System: 9.6	6%
Definitions: <b>Forced or Compulsory Labour</b>	6%
Definitions: Home worker	6%
Working Hours: 7.2	6%
Remuneration: 8.1	6%
Freedom of Association: 4.3	6%
Freedom of Association: 4.2	6%
Forced or Compulsory Labour: 2	5%
<b>Health and Safety: 3.9</b>	5%
Child Labour: 1.4	5%
<b>Discrimination: 5.1</b>	5%
Remuneration: 8.3	5%
General Comments: Overall, are you satisfied with the direction of the <b>standard revision?</b>	5%
Disciplinary Practices: 6.1	5%
Definitions: Management representative	4%
Definitions: Young worker	4%
Definitions: <b>Private employment agency</b>	4%
Working Hours: 7.1	4%
Working Hours: 7.3	4%
Working Hours: 7.4	4%
Discrimination: 5.2	4%
Freedom of Association: 4.1	4%
Health and Safety: 3.10	4%
Child Labour: 1.1	3%
Remuneration: 8.2	3%
Remuneration: 8.5	3%
<b>Forced or Compulsory Labour: 2.2</b>	3%
Definitions: Human trafficking	2%
Discrimination: 5.3	1%
Forced or Compulsory Labour: 2.5	1%

## COMMENTS DISCUSSION

This section explains the methodology used to assess the 900+ comments received during the public consultation period. Every single comment was analyzed by the Standards Revision Committee and was either adopted, rejected, slated for inclusion in the Guidance Document or slated for consideration during the next revision process.

### ADOPTED COMMENTS

Comments were adopted when they either: improved the organization of criteria; added clarity or offered better wording; pointed out a misunderstanding or confusion; or represented the majority point of view on an issue for which we were soliciting their specific choice of views. See the following sample of adopted comments:

Provision/Section	Subsection	Comment	SA8000: 2014 Wording	Justification for Adoption
III. Definitions	1. Shall and 2. May	"It's best to remember how ISO describes certain words like 'shall,' 'should,' etc. This is how CBs approach their use in standards."	1. Shall: In this Standard the term "shall" indicates a requirement. Italics have been added for emphasis.  2. May: In this Standard the term "may" indicates a permission. Italics have been added for emphasis.	This comment pointed out the importance of emphasizing the deliberate use of the terms "shall," and "may" in the Standard, and led to the insertion of definitions of both terms as well as <i>italicization</i> of the terms throughout the Standard.
IV. Health and Safety	3.3	"Wording should reflect that PPE is a LAST resort. It should say something like, 'Where the organisation cannot provide worker protection by any other means they shall provide personnel with appropriate personal protective equipment at its own expense.'"	Where hazards remain after effective minimisation or elimination of the causes of all hazards in the workplace environment, the organisation shall provide personnel with appropriate personal protective equipment as needed at its own expense. In the event of a work-related injury the organisation shall provide first aid and assist the worker in obtaining follow-up medical treatment.	This comment was effective in creating a better risk-assessment based process within the Health and Safety element.
IV. Health and Safety	3.5	"The committee should be a HEALTH and	A Health and Safety Committee, comprised of a well-balanced group of management representatives and workers,	This comment references a new requirement of the Standard, which was written as a "Safety"

		<p>safety committee, with emphasis on comprehensive health of workforce, not just 'safety' concerns."</p>	<p>shall be established and maintained. Unless otherwise specified by law, at least one worker member(s) on the Committee shall be by recognised trade union(s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers shall appoint a representative(s) as they deem appropriate. Its decisions shall be effectively communicated to all personnel. The Committee shall be trained and retrained periodically in order to be competently committed to continually improving the health and safety conditions in the workplace. It shall conduct formal, periodic occupational health and safety risk assessments to identify and then address current and potential health and safety hazards. Records of these assessments and corrective and preventive actions taken shall be kept.</p>	<p>committee composed of managers and workers. The comment offers better wording and emphasis of the concept by explicitly adding the term "Health, making it a "Health and Safety" committee.</p>
IV. Health and Safety	3.7	<p>"The organization shall maintain written records of all health and safety incidents that occur in the workplace and in residences and property provided directly or indirectly by the organisation.' What is 'directly or indirectly' supposed to mean?"</p>	<p>The organisation shall establish documented procedures to detect, prevent, minimise, eliminate or otherwise respond to potential risks to the health and safety of personnel. The organisation shall maintain written records of all health and safety incidents that occur in the workplace and in all residences and property provided by the organisation, whether it owns, leases or contracts the residences or property from a service provider.</p>	<p>The comment effectively points out the flaw in the original wording of this requirement and the need to restate its intent. Thus, we amended the sentence to read, "...and in all residences and property provided by the organization, whether it owns, leases or contracts the residences or property from a service provider."</p>
IV. Management System	9.10.1	<p>"Add 'significant' before 'risks;'" and</p>	<p>The organisation shall conduct due diligence on its suppliers/subcontractors, private employment agencies and sub-suppliers' compliance</p>	<p>These two comments were extremely helpful in clarifying what historically has been a difficult criteria to interpret and implement. Based on</p>

<p>“The wording is not clear and the flow of for an adequate evaluation of supplier performances is missing. 9.10.1. [Subparagraphs b,c,d should be better rephrased in order to reflect the intent of the standard. Otherwise, it can be perceived that, if the organization has hundreds of suppliers, the risk assessment and monitoring of implementation of all these measures for all suppliers is almost impossible (long time, many people involved in unproductive activities, deteriorating supplier relationships, impossibility to access certain data).]”</p>	<p>with the SA8000 Standard. The same due diligence approach shall be applied when selecting new suppliers/subcontractors, private employment agencies and sub-suppliers. The minimum activities for the organisation to fulfil this requirement shall be recorded and shall include:  b) assessing significant risks of non-conformance by suppliers/subcontractors, private employment agencies and sub-suppliers. [Note: an explanation of “significant risk” is found in the Guidance Document];</p>	<p>comments received, particularly the two copied at the left, the entire requirement was reorganized to emphasize the scope of this requirement, which now focuses on “significant risks” and appropriate action to address them..</p>
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**REJECTED COMMENTS**

Comments were rejected when they either: called for a roll-back of requirements that contravene the intent of SA8000; asked for additional requirements that widened the scope of the Standard; added prescriptive requirements that removed current flexibility from the Standard; removed responsibilities from workers and their representatives; called for special attention to a single country, region or sector; or represented the minority point of view on an issue for which we were soliciting their specific choice of views. See the following sample of rejected comments:

Provision/Section	Subsection	Comment	SA8000: 2014 Wording	Justification for Rejection
III. Definitions	20. SA8000 worker representative(s)	"The term 'freely elected' should be avoided. Since success of the SA8000 program depends on the choice of right persons in the implementation stage."	One or more worker representative(s) freely elected by workers to facilitate communication with the management representative(s) and senior management on matters related to SA8000. In unionised facilities the worker representative(s) shall be from the recognised trade union(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers may freely elect the worker representative(s) for that purpose.	This comment was rejected because it contravenes a central requirement of the SA8000 worker representative(s): the worker representative function is not meant to be a committee formed at management's request; instead the emphasis is on workers' choice whether or not and how to fill this function.
IV. Health and Safety	3.8	"I do not believe it is important to add this provision."	The organisation shall provide, for use by all personnel, free access to: clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.	This comment references a new requirement that SAI asked commenters to discuss: "the organization <i>shall</i> provide...suitable spaces for meal breaks..." The comment was rejected because it represents a minority view; of the 111 commenters who responded to the question, 102 or 91.9% were in favor of the new requirement.
IV. Management System	9.5.1	"9.5 should require a documented procedure, which is a valuable practice in ISO 14001 and OHSAS 18001 (future ISO 45001)."	The organisation shall demonstrate that personnel effectively understand the requirements of SA8000, and shall regularly communicate the requirements of SA8000 through routine communications.	This comment was often repeated by the same commenters throughout their review of the draft Standard, and reflects a point of view of increasing the documentation requirements throughout SA8000. This point of view was generally rejected because it eliminates the flexibility SA8000 seeks to provide for its users. The more documentation requirements added to the Standard, the more difficult it becomes for smaller, less policy and procedure-oriented workplaces to comply with the Standard's requirements, even if they comply with its intent.
IV. Child Labour	1.3	"The organisation may employ"	The organisation may employ young workers, but where such young workers are subject to	The comment asks to increase the number of combined hours for school, work and

		<p>young workers, but where such young workers are subject to compulsory education laws, they may work only outside of school hours. Under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 12 hours per day. In no case shall young workers work more than 12 hours a day or during night hours."</p>	<p>compulsory education laws, they shall work only outside of school hours. Under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work than 8 hours a day. Young workers may not work during night hours.</p>	<p>transportation time for young workers from 10 to 12, and asks to increase the number of hours they may work in a day from 8 to 12 hours. This comment was rejected because it runs counter to international conventions on which this requirement is based.</p>
IV. Child Labour	1.3	<p>"Apprentices seems to be a loophole."</p>	<p>The organisation may employ young workers, but where such young workers are subject to compulsory education laws, they shall work only outside of school hours. Under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work than 8 hours a day. Young workers may not work during night hours.</p>	<p>The commenter calls for a review of the role of apprentices in this criteria because they feel that apprentices are not covered by this its working hours limits. The comment was rejected because the definitions of "young worker" and "child" are inclusive of apprentices, if apprentices are of a certain age.</p> <p>Furthermore, criteria 8.5 does not allow organisations to use false apprenticeship schemes to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labour and social security.</p>

**COMMENTS SLATED FOR INCLUSION IN THE GUIDANCE DOCUMENT**

Some commenters suggested additional requirements or the addition of particular details to our draft revised requirements that would not have enhanced the need for brevity and clarity in the requirements themselves. Those that were found to be useful were marked for inclusion in the Guidance Document. The comments that were rejected or not assigned to the Guidance either: added requirements that removed current flexibility from the Standard; called for additions that go beyond desired minimum

requirements; or called for special attention to a single country, region or sector. See the following sample of rejected comments:

Provision/Section	Subsection	Comment	SA8000: 2014 Wording	Justification for Inclusion in Guidance
II. Definitions	20. SA8000 worker representative(s)	“Worker representative can be elected but the nomination shall be decided based on service tenure, performance, educational background, career background, characteristics and interest of the worker.”	One or more worker representative(s) freely elected by workers to facilitate communication with the management representative(s) and senior management on matters related to SA8000. In unionised facilities the worker representative(s) shall be from the recognised trade union(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers may freely elect the worker representative(s) for that purpose.	The comment includes good ideas about how to elect a worker representative(s) that will effectively facilitate communication with the management representative(s) and senior management on matters related to SA8000. However, these prescriptive considerations remove flexibility that we desire for the election of worker representative(s) and are not based on an internationally recognized instrument. We decided they are better suited for the Guidance Document in order to allow workers to take them into consideration, without prescribing them.
IV. Child Labour	1.2	“Include ‘collaborative approach’ along with government authorities and NGOs. The financial adequacy will remain open ended and thus will not lead to required compliance levels.”	The organisation shall establish, document, maintain and effectively communicate to personnel and other interested parties, written policies and procedures for remediation of child labourers, and shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child as defined above.	This comment was deemed suitable for inclusion in the Guidance Document because it calls for a specific method of verifying the effectiveness of support programs, which denies flexibility in approach. By including this as an option in the Guidance Document, organisations may choose the best fit for their specific context.
IV. Forced Labour	2.4	“Reasonable notice should be defined. I suggest 2 weeks.”	Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment provided that they give reasonable notice to their organisation.	This is already dealt with in the Guidance Document but will be discussed further. The exact number of days required for the employee to give “reasonable notice” to terminate their employment varies by state, locality, industry or other aspects of the employment. The time period required may also be stated in workers’ contracts or collective bargaining agreements. Providing the

				worker gives reasonable notice, then that employee should be able to leave in conformance with the standard.
IV. Health and Safety	3.8	<p>“Providing eating space is critical for several reasons: 1) the risk of exposure to ingestion of hazardous chemicals in the workplace; 2) agricultural workers need to have sanitary awareness training so as not to ingest residual pesticides and herbicides while eating; and 3) controlling food and garbage locations is key to controlling rodent infestation.”</p>	<p>The organisation shall provide, for use by all personnel, free access to: clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.</p>	<p>This comment includes highly useful information that will be included and discussed in the Guidance Document. The comment includes explanatory insight rather than minimum requirements, which also contributes to its suitability in the Guidance.</p>
IV. Management System	9.2	<p>“Detail structure of "Social Performance Team (SPT)" can be added like number of team members, regulatory measures and their specific "Team Job Description" and reporting and authorities.”</p>	<p>9.2.1 A Social Performance Team (SPT) shall be established to implement all elements of SA8000. The Team shall include a balanced representation of: a) SA800 worker representative(s); and b) management. Compliance accountability for the Standard shall solely rest with Senior Management.</p>	<p>This comment provides an excellent framework for the nature of the details that will need to be added to the Guidance Document. The reason for including them in the Guidance Document rather than in the Standard is that flexibility would be lost if prescriptive requirements were added that removed freedom from the SPT and its worker and management representative(s) to set their own processes and practices in order to fulfill their roles as set out in the standard.</p>

While all comments will be kept on file and consulted as part of the next Standard revision, particular comments were selected as requiring additional research into their impacts, if they were to be adopted. See the following list of comments that will be considered for the next revision.

Comment	Justification for Consideration During Next Revision
<p>“Restructure SA8000 to resemble the newly harmonized ISO format.”</p>	<p>This comment represented the point of view of a minority of commenters, typically auditors with ISO experience. Many auditors from social performance backgrounds (code of conduct auditors) felt that this change would be detrimental to the interpretation and implementation of the Standard. Research will need to be done to properly understand the future advisability of structuring the Standard in full or partial conformance with ISO’s format.</p>
<p>“Reconsider the Standard’s limitations/inapplicability to small organisations. It is too difficult for small organisations to implement the Standard’s requirements relating to the Management System as a whole, some Health and Safety requirements, and the new requirements of a Social Performance Team and Health and Safety Committee.</p>	<p>This comment requires serious consideration for the next revision. Many have echoed it over the years. It is also a limitation that will need further research in order to ascertain if there are sufficient adjustments to the Standard that could and should be made to make it suitable for use by small organizations.</p>
<p>“Include requirements that are analogous to current global movements towards requiring businesses to contribute certain sums by value or percentage to their CSR efforts, such as the Indian CSR law.”</p>	<p>Currently there are few examples of “global movements towards requiring businesses to contribute certain sums by value or percentage to their CSR efforts.” Although the time may not now be ripe for such a new requirement, the five years until the next revision may bring compelling research on this concept, as well as provide time for this movement to reach significant global acceptance.</p>