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Director of Research
2017 Public Comment Period
Sustainability Accounting Standards Board
1045 Sansome St., Suite 450, San Francisco, CA 94111

December 21st, 2017

Re: Disclosure Topic (Occupational Safety and Health/Workforce Health, Safety and Well-being)

Dear Director of Research,

On behalf of the American Society of Safety Engineers and the Center for Safety and Health Sustainability, we are pleased to submit comments on the exposure draft of the SASB standards.

For over 100 years, the American Society of Safety Engineers has been at the forefront of helping occupational safety and health (OSH) professionals protect people and property. Its global membership of over 37,000 professionals covers every industry, developing safety and health management plans that prevent deaths, injuries and illnesses. ASSE advances its members and the OSH profession through education, advocacy, standards development and a professional community.

ASSE is also a founding member of the Center for Safety and Health Sustainability (CSHS), a consortium of leading global occupational safety and health (OSH) organizations. Officially launched in June 2011, CSHS is a 501(c)3 nonprofit organization committed to advancing the safety, health and sustainability of the global workplace. CSHS member organizations represent over 100,000 OSH professionals in over 70 countries.

CSHS has published two reports analyzing OSH-related sustainability reporting practices and a guide on the best practices for OSH-related sustainability reporting, both available at www.centershhs.org.

The CSHS work has demonstrated that voluntary sustainability reporting on OSH lacks the degree of rigor necessary to allow key stakeholders to effectively evaluate corporate performance or compare performance across organizations. To address this concern, CSHS advocates for new levels of collaboration among the leading sustainability reporting frameworks and standards development organizations (GRI, UNGC, IIRC and SASB).

Standardized terms, definitions, and data collection methodologies and reporting formats must be agreed upon and adopted by these groups. While the types of information needed by key stakeholders of these groups may vary (e.g. shareholders versus stakeholders), the need for more disciplined reporting practices is universally applicable.

Other concerns stemming from the CSHS work, such as the low levels of reporting on certain indicators, the lack of leading indicators, and the absence of an indicator relating to workers for suppliers in developing countries, highlight the need to re-evaluate the appropriateness of the OSH performance indicators currently recommended for reporters.

ASSE and CSHS have also sponsored a study by Harvard Law School's Labor and Worklife Program examining corporate disclosure of human capital policies/procedures and outcomes, including those related to OSH. It analyzed nearly 2,000 of the largest firms traded on global exchanges, looking at metrics disclosed publicly and those reported by respondents to the RobecoSAM Corporate Sustainability Assessment.

ASSE and CSHS applaud SASB's goal of fostering high-quality disclosure of material sustainability that meets investor needs. SASB's work has the potential to make sustainability reporting more focused and impactful, which is particularly important to OSH as more than 2.3 million people die annually from occupational accidents and work-related diseases. To achieve SASB's goal, we believe there must be a consensus on the OSH metrics or indicators that should be reported, the data collection methodologies and reporting formats to be used, and the definition of terms.

Both ASSE and CSHS have significant experience in the development of OSH reporting metrics based on the real-world experience of our members. We would welcome the opportunity to work with SASB in ensuring that the exposure standards have been fully vetted and are data-driven.

Towards that end, ASSE surveyed its members to gain insight on the SASB exposure drafts. The survey was designed to elicit input from members on SASB's findings on OSH materiality and the OSH metrics SASB developed. The survey was sent to 28,609 members and 601 responded (4% margin of error).

[A summary of the survey responses is available at this link.](#) You will find relevant comments in the embedded excel spreadsheet files. Key findings include:

- The majority of respondents (76%) in industries where OSH was deemed immaterial by SASB disagreed with the decision.
 - The Insurance and Professional Services were the top two industries represented by this group, who believed that industrial and business safety were integral to their fields.

- 26% of this group listed areas they considered pertinent to OSH.
- A considerable number of respondents in this group believed that presenting their industry as material to investors would either make the company more competitive to the investors/clients (16%) or would have a financial impact (15%).
- The remaining 24% of respondents in industries deemed immaterial by SASB agreed that their industry was inherently lower risk with regard to OSH.
- 38% of respondents in industries deemed material to SASB agreed with the reporting metrics provided, while 60% disagreed. Those who disagreed believed the metrics were either too broad, did not properly represent their industry, or were too limiting in viewing an organization's full risk profile.
- 21% of respondents in industries deemed material by SASB believed the metrics were missing leading indicators. Several respondents listed specific areas that needed metrics (coded category called "Extension/expansion of metrics").

We appreciate your attention to these concerns. If you have any questions regarding the above, please do not hesitate to reach out to myself or ASSE Executive Director Dennis Hudson (dhudson@asse.org).

Best Regards,

A handwritten signature in black ink that reads "James D. Smith". The signature is written in a cursive style with a large, looped initial "J".

James D. Smith
President, American Society of Safety Engineers