

Tamed Transparency: How Information Disclosure under the Global Reporting Initiative Fails to Empower

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Introduction

Information disclosure is often associated with high hopes. The collection and dissemination of sustainability data might set in motion internal processes within the disclosing organization; and it might also help to identify specific needs for governmental regulation or improve the functioning of markets. Moreover, most corporate disclosure policies also include the notion that transparency can empower information users to exert influence on the disclosers. The use of disclosed information is expected to enable stakeholders to make informed decisions, confront disclosers through shareholder motions or collectively organize against them if deemed necessary. In short, transparency is expected to become a tool for holding powerful actors accountable.¹

While the academic literature suggests that transparency can indeed inspire changes in internal business practices and thus make a difference to corporate (environmental) performance, its contribution to the more ambitious goals of empowerment and enhanced accountability deserves further scrutiny.² The more optimistic voices frequently cite the US-based Toxics Release Inventory (TRI) as an example in which information disclosure has made stakeholders more knowledgeable and, at least partially, more powerful.³ The TRI legally requires industrial facilities in various sectors to disclose information on the release of over 600 toxic chemicals. It thus works to render the manufacturing industry more accountable to a relatively broad range of stakeholders.⁴ Analyses

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1. Brown, de Jong, and Lessidrenska 2009; Gilbert 2002; Gupta 2008; Hale 2008; Holzner and Holzner 2006; and Ramkumar and Petkova 2007.
2. Positive environmental effects of corporate sustainability reporting are identified in Clarkson et al. 2008; see also references cited therein. We do not intend to downplay such effects; yet our focus is on the rather different claim that corporate disclosure can empower various constituencies. We are grateful to an anonymous reviewer for asking us to clarify this important difference.
3. Van den Burg 2004.
4. Graham 2002; Hamilton 2005; and van den Burg 2004.

of other disclosure regulations, among them the contributions to this special issue, suggest that empowerment may be a feature of *specific schemes* such as the TRI, but not necessarily of disclosure policies *in general*. Gupta's analysis of regulations related to genetically modified organisms thus reveals that how information disclosure is operationalized in the Biosafety Protocol to the Convention on Biological Diversity reinforces rather than alters existing power relations.⁵ Similarly, Mason's contribution points to difficulties of the Aarhus Convention to promote a substantive human right to a healthy environment through granting access to information.⁶

In this article, we put the "empowerment thesis" to a reality check in an analysis of a particular disclosure scheme, namely the Global Reporting Initiative (GRI). More precisely, we examine the link between transparency and empowerment at four different levels. First, we study how the transparency rhetoric of the organization specifies the goal of empowerment. Second, we analyze to what extent the organization's transparency policies take account of a range of contextual conditions that allow disclosure to actually empower a variety of stakeholders. Third, we explore how actual corporate reports fare in terms of these conditions. And finally, we discuss to what extent civil society organizations (CSOs) use and translate information from corporate GRI reports to realize the empowerment potential of disclosure under the GRI. Taken together, the analysis of all four levels provides a more nuanced picture of the tensions that mark the relation of transparency and empowerment.

Theoretically, our analysis is based on the assumption that the transformative potential of transparency depends on the policy environment and on the design of disclosure policies. With regard to the former, we assume that information disclosure can best live up to its empowerment promise in a participatory and pluralistic political culture with a vigorous and independent civil society and media.⁷ With regard to policy design, we expect transparency to make a difference if its design allows the reported information to become embedded in the users' routines.⁸ More precisely, we build on the work of Fung and colleagues and assume that transparency systems such as the GRI are most likely to fulfill their empowerment promise when the disclosed information is *valuable*, *accessible*, *comprehensible* and *comparable*.⁹ Our primary focus is on comparability since this criterion is implicitly present in at least two of the other three criteria. Thus, information is more valuable and more comprehensible when it is comparable. Moreover, the GRI itself bases its own claim to added value almost exclusively on its promotion of standardized and therefore comparable corporate social responsibility (CSR) reports.

5. See Gupta 2010a and 2010b.

6. See Mason 2010.

7. Mol 2008.

8. Fung, Graham, and Weil 2007.

9. Fung, Graham, and Weil 2007. We slightly deviate from Fung et al.'s framework in conceptualizing "value" and "comparability" as separate categories.

The Global Reporting Initiative

The GRI is an independent nongovernmental organization (NGO) established in 2002; its global secretariat is based in Amsterdam. The main business of the GRI is to develop and promote a coherent framework for non-financial reporting. To this end, the GRI regularly updates its *Sustainability Reporting Guidelines* in complex multi-stakeholder processes that include the participation of business, organized civil society, labor, consultancies, academics and representatives of governmental as well as intergovernmental organizations.¹⁰

The current reporting framework is called the G3, referring to the third generation of *Sustainability Reporting Guidelines*. The G3 are composed of reporting principles and performance indicators. The reporting principles define the report content and quality and provide guidance on how to determine the boundary of a report. The performance indicators specify which aspects of an organization's activities and impacts are to be covered. The indicators embrace different substantive areas, including economic and environmental impacts, impacts on labor practices and human rights, and the broader issue of product responsibility. Examples include the economic indicator EC 4 "Significant financial assistance received from government"; the environmental indicator EN 15 "Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk"; or the labor relations indicator LA 14 "Ratio of basic salary of men to women by employee category."¹¹ Finally, the reporting principles and performance indicators are complemented by *indicator protocols* that specify how data on particular indicators is to be calculated and presented, and by *sector supplements* that specify the reporting needs for a range of business sectors, including the automotive industry, the financial services sector and airports (see also Table 1).

Since the most recent revision of the *Sustainability Reporting Guidelines* reporting organizations are also required to declare an "application level." There are currently three application levels. The level "A" can be awarded when a corporation reports on all indicators of the G3 and of the relevant Sector Supplement, and when it includes a statement on its management approach to each indicator category. The level "B" is awarded for organizations that report on a minimum of 20 indicators plus on their management approaches for the different indicator categories. The level "C" signifies that a report covers at least 10 indicators, but not necessarily a statement on a corporation's management approaches.

In terms of relevance, the GRI is commonly regarded as the world's leading voluntary scheme for corporate non-financial reporting. The GRI recently communicated that the share of GRI reporters among all corporations listed in national stock markets amounts to 64 percent of Germany's DAX 30, 48 percent

10. On the GRI's emergence, dynamic and structure, see Brown, de Jong, and Levy 2009; Brown, de Jong, and Lessidrenska 2009; Dingwerth 2007; and Pattberg 2007.

11. Global Reporting Initiative 2006.

Table 1
Elements of the Reporting Framework¹

<i>Element</i>	<i>Function</i>	<i>Example(s)</i>
Reporting Principles	Define the report content and quality.	Content: Materiality; stakeholder inclusiveness; sustainability context; completeness Quality: Balance; comparability; accuracy; timeliness; reliability; clarity
Indicators	Define the areas in which organizations are asked to report and the measures to use.	EN 15 "Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk"
Indicator Protocol	Provide guidance for reporting on individual indicators.	Indicator Protocols Set Economic; Indicator Protocols Set Environmental; Indicator Protocols Set Human Rights; Indicator Protocols Set Labor; Indicator Protocols Set Product Responsibility; Indicator Protocols Set Society
Sector Supplement	Provide guidance for individual industry sectors.	Electric Utilities Sector Supplement; Automotive Sector Supplement; Mining and Metals Sector Supplement; NGO Sector Supplement
Application Level	Defines how closely the reporting framework has been followed in the preparation of a report.	Level "B": An organization has reported on at least 20 indicators and on their management approaches for the different indicator categories.

1. Global Reporting Initiative 2006.

of France's CAC 40, 22 percent of the UK's FTSE 100 and 13 percent of the US' S&P 500.¹² Moreover, a range of governments have either encouraged GRI reporting or established regulations based on the GRI framework, thus providing at least a thin "shadow of hierarchy" for the GRI and its regulatory framework.¹³

In the following, we explore the relation between transparency and empowerment at four different levels of activities of the GRI. More precisely, we examine (1) the rhetorical practice and (2) the policies of the GRI, (3) the

12. Global Reporting Initiative 2009d.

13. See for instance Commission of the European Communities 2002, 14; and King Committee on Corporate Governance 2002, section 5.

sustainability reports that corporations publish in response to these policies, and (4) the activities of intermediaries that translate information contained in GRI reports for the purposes of different user groups.

Level One: Transparency in the Rhetoric of the GRI

A broad range of political actors place high hopes on GRI reporting. The following excerpts from statements made in the context of the inauguration of the GRI in 2002 exemplify these hopes:¹⁴

- Mary Robinson, then UN High Commissioner for Human Rights, maintained that the “GRI provides a valuable framework for (. . .) stakeholders to assess the extent [to] which companies are living up to their human rights commitments;”
- The president, chairman and chief executive officer of the Charles Stewart Mott Foundation explained that “the Mott Foundation’s decision to support the Global Reporting Initiative was based on our belief that complete, accurate institutional disclosure is a powerful tool for achieving a better society;”
- The General Secretary of the International Confederation of Free Trade Unions attributed to the GRI “the potential to increase the transparency and accountability needed to build sustainable societies;”
- The president of the US-based World Resources Institute held that “information is power, including the power to demand accountability. By providing a framework for sustainability disclosure, the Global Reporting Initiative is becoming the leading-edge model for accountable corporate governance in the new global economy;”
- And the president of the Brazilian think tank Instituto Ethos argued that “without credible standardized sustainability reporting, emerging economies are at a disadvantage, and this will only exacerbate existing disparities of power and wealth. I believe the *GRI Guidelines* can help us level the playing field, and ensure global capital markets are accompanied by global disclosure rules.”

In this context, as well as in the GRI’s own rhetoric, the notion of transparency plays a central role—a role that is exemplified in the GRI conferences being labeled “The Amsterdam Global Conference on Sustainability and Transparency” or in a recent statement of the GRI board on the global financial crisis carrying the title “Amsterdam Declaration on Transparency and Reporting.” Since transparency is so crucial to the underlying ideas of the GRI, it is worth taking a closer look at how the GRI itself conceptualizes this term. In the following, we therefore examine the ways in which transparency is understood in the external

14. Global Reporting Initiative 2002, 8, 18, 50, 22, and 50.

communications of the GRI; our analysis is based on the GRI website (as of March 2009) and on communications on the governance of the GRI that cover the period from the organization's foundation to July 2004.

Interestingly, an explicit definition of transparency is not that easy to locate in the GRI's own communications. The only instance is in the *Sustainability Reporting Guidelines* where the GRI defines transparency as

the complete disclosure of information on the topics and Indicators required to reflect impacts and enable stakeholders to make decisions, and the processes, procedures, and assumptions used to prepare those disclosures.¹⁵

Transparency is thus focused on the desire of stakeholders to make informed decisions; moreover it is based on the notion that stakeholders would make different choices if they had less complete information. Since transparency is linked to personal autonomy, it becomes a normatively loaded term; it requires those organizations that have relevant economic, environmental, social or other impacts to "completely disclose" all information that stakeholders need to make a decision to buy or not to buy, to invest or not to invest, or to collectively organize against a company or refrain from doing so.

Yet, this normatively demanding definition only vaguely informs other communications of the GRI. In contrast, our analysis reveals a heterogeneous communicative practice in which the GRI presents us with at least four different uses and justifications for transparency. These uses and justifications are not necessarily incompatible, but they have different implications for the range of information that organizations are asked to disclose.

Explicit Normative Reasoning

The first use of transparency is closest to the abovementioned definition in that it conceives of transparency as inherently valuable. It maintains that because an organization's activities have an impact on the legitimate interests of other actors, that organization should disclose information about such impacts to become more accountable. For instance, a GRI press statement justifies the development of a sector supplement for the media industry in explicitly normative terms:

Obviously messages from the media regularly influence global opinion on important issues of the day. How the general public, corporations and governments respond to the media's messages can affect the economy, the environment and ultimately the whole of society. Thus, media companies bear a huge responsibility and must be transparent about their activities. For these reasons, many media companies are interested in more specific guidance on how they can monitor their impacts and be transparent to their customers and stakeholders. GRI and these interested partners from the media world

15. Global Reporting Initiative 2006, 6.

are keen to fill this gap by developing this new GRI Media Sector Supplement.¹⁶

Yet this normative framing hardly dominates the GRI's external communications. It occasionally appears in the organization's communication about the information disclosure of public agencies¹⁷ and civil society organizations¹⁸, but is only infrequently used in the GRI's communications that deal with the corporate sector.

Instrumental Justification

The dominant justification of transparency in communications related to the corporate sector is instead instrumental. In its narrow definition it mainly holds that transparency is useful for reporting organizations, either because it helps to identify efficiency gains or because it is demanded by particular audiences on whose support an organization depends. Thus, the GRI stipulates that

for multinational enterprises (MNEs), being transparent about their supply chains helps demonstrate commitment to sustainable development and can secure stronger market leadership, especially from consumers for whom ethical sourcing is an important purchasing decision.¹⁹

This conception of transparency is different from the definition in the G3 document in as much as it values transparency not as a means to enhance the decision-making autonomy of stakeholders, but as a means for corporations to "secure market leadership." The same holds for the GRI's attempt to associate transparency with much broader social and political goals, as for instance in relation to the current global financial and economic crisis to which the organization alludes in the following statement:

Now is the time to build a culture of decision-making that is conducive to long-term economic, environmental and social well-being in the world. Sustainability reporting is a tool that can help to achieve this goal as it facilitates transparency and accountability, enables like-for-like comparison between organizations' sustainability performance, and through the process of gathering data and information, it creates optimal conditions for new sustainability systems to be established within organizations.²⁰

Here too, transparency is not justified in terms of personal decision-making autonomy, but in terms of an external goal, namely "long-term economic, environmental and social well-being in the world." In both cases transparency is not

16. Global Reporting Initiative 2009c.

17. See Global Reporting Initiative 2009e.

18. See Global Reporting Initiative 2008b.

19. Global Reporting Initiative 2007a.

20. Global Reporting Initiative 2008a.

a value in itself but a means to promote market leadership and “global well-being,” respectively.

Transparency and Sustainability

The notion of long-term well-being points to a third use and justification of transparency in GRI communications that invokes an inherent link between transparency and sustainability. In these communications, transparency is not defined at all, but rather portrayed as a logical precondition, a corollary or as otherwise inherently related to sustainability. This holds for references to “the global movement towards transparency and sustainability”²¹ or to “the fields of sustainability and transparency”²²; for press statements that declare that “the City of Buenos Aires, China and Sweden have all recently announced steps towards sustainable and transparent business practice”²³; for calls upon stakeholders to “join a worldwide network that demonstrates their commitment to transparency, accountability and sustainable development”²⁴; or for the GRI’s search for “large companies interested in bringing transparency, not to mention better management skills on sustainability issues, to their supply chain through the GRI reporting process.”²⁵

In all these instances, transparency is treated as something that is self-evidently valuable. It is suggested that transparency is either, like sustainability, an end in itself—that the reader knows (or should know) why she should value transparency—or that a somehow evident link exists between transparency and sustainability.

Transparency as an Element of World Culture

Finally, a fourth use refers to transparency as a social norm. Here, transparency (or information disclosure) is described as a socially appropriate practice for corporations. This view is, for instance, expressed in a GRI press statement that stresses the “great relevance” of the GRI’s reporting standard “in today’s world where disclosure and transparency is considered a key responsibility of financial institutions.”²⁶

In sum, the GRI defines transparency in a coherent and normatively demanding way, but it does not necessarily stick to this definition and justification of transparency in its own communications. Instead, it offers a range of different uses of transparency that come with different justifications and, as a result,

21. Global Reporting Initiative 2008c.

22. Global Reporting Initiative 2007b.

23. Global Reporting Initiative 2008c.

24. Cf. the information provided in Global Reporting Initiative 2009f.

25. Global Reporting Initiative 2009b.

26. Global Reporting Initiative 2008d. The portrayal of transparency as an element of world culture fits broadly with writings of the world polity school; see Drori, Meyer and Hwang 2006 for an overview.

with different implications for the scope and quality of information disclosure that is deemed necessary. While the GRI's explicit definition of transparency in the G3 Guidelines demands disclosure of all information that is potentially relevant in terms of stakeholders' personal autonomy, the instrumental conception calls for disclosing only those pieces of information that help to secure market leadership or "global well-being." The third use of transparency requires disclosure "for sustainability purposes" and largely leaves it to the reporting entities to define what this would mean in practice; the fourth use determines the optimal scope of disclosure in relation to corresponding practices of peer groups and to the expectations of actors with which an organization interacts. As can be seen from the differences, a transformative ambition is only included in the official definition in the G3, but plays a much weaker role in the communicative routines of the organization.

Level Two: Transparency in the GRI's Policies

Depending on their own theoretical backgrounds, some readers might not want to give too much weight to "mere rhetoric." To what extent the GRI values transparency, they might argue, is best answered by examining how the political practice of the organization respects our abovementioned enabling conditions of value, accessibility, comprehensibility and comparability. As we illustrate in this section, the GRI is generally aware of these preconditions for "effective transparency" and addresses them in its own policies. Yet compliance management with the reporting principles is hardly developed. Moreover, while the comparability of reports remains the core ambition of the GRI, the organization only slowly progresses in designing and implementing policies and tools to reach this goal.

Value

The notion that information disclosure should be guided by the value it offers to its readers is firmly embedded in several reporting principles. The principle of materiality addresses this criterion most directly. It is itself guided by the G3's definition of transparency and stipulates that

The information in a report should cover topics and Indicators that reflect the organization's significant economic, environmental, and social impacts, or that would substantively influence the assessments and decisions of stakeholders.²⁷

Since not all GRI indicators will be equally relevant to the activities of all corporations, GRI reports are expected to reflect this variation in the level of detail and completeness at which information is reported on a given indicator. The

27. Global Reporting Initiative 2006, 8.

“threshold at which an issue or Indicator becomes sufficiently important that it should be reported” should, according to the G3, be determined with a view to different stakeholder groups and ideally be established in consultations with these groups.²⁸ Moreover, relevant sector-specific sustainability issues “identified through sound investigation by people with recognized expertise, or by expert bodies with recognized credentials in the field” should also be covered in sustainability reports.²⁹

In practice, however, the reporting principles offer only a soft guideline for preparing a sustainability report. Moreover, only if a reporting organization seeks to attain the highest of currently three application levels, it needs to provide reasons why a performance indicator on which it does not disclose information is considered immaterial. In addition, compliance with the other reporting principles is difficult to verify and thus not discussed in the GRI’s description of the various application levels.³⁰

While reporters are therefore unlikely to be punished for less valuable reports, the GRI has created a Readers’ Choice Award as an instrument to reward particularly valuable reports. Thus far, awards have been issued for the report with the highest utility (measured in terms of different indicators); for reports that are particularly valuable for “key information user communities such as investors, labor, civil society, employees/management, and media”; and for the best reports from non-corporate organizations, smaller enterprises and non-OECD companies.³¹ Moreover, the GRI has commissioned a survey of report readers’ preferences in order to identify more precisely the information needs of particular user groups.³² By identifying the users’ needs and giving incentives for valuable reporting, the GRI tries to softly improve the value of the reports and thus strengthen their empowerment potential. The reliance on soft measures however implies that “empowerment through transparency” depends to a large extent on the goodwill or interests of reporters.

Accessibility and Comprehensibility

The accessibility and comprehensibility of GRI reports are dealt with in the reporting principle of clarity. It demands that “information should be made available in a manner that is understandable and accessible to stakeholders using the report.”³³ Accessibility as defined by the GRI thus includes the physical accessibility of a report—for instance the free availability of sustainability reports on the Internet—but also the arrangement and presentation of information. In short, the GRI demands that “a stakeholder should be able to find desired infor-

28. Global Reporting Initiative 2006, 8.

29. Global Reporting Initiative 2006, 9.

30. See the discussion in Global Reporting Initiative 2009g.

31. Global Reporting Initiative 2007c.

32. KPMG and SustainAbility 2008.

33. Global Reporting Initiative 2006, 16.

mation without unreasonable effort."³⁴ The principle is fairly demanding in the sense that "those with particular accessibility needs (e.g., differing abilities, language, or technology)" should also be given access to information.³⁵ In practice, meeting this particular criterion might thus require translations of reports into various languages and the preparation of reports with different levels of complexity.

Comparability

Finally, the issue of comparability is dealt with in a reporting principle with the same title. The principle acknowledges that "comparability is necessary for evaluating performance" and stipulates that "reported information should be presented in a manner that enables stakeholders to analyze changes in the organization's performance over time, and could support analysis relative to other organizations."³⁶ The G3 Guidelines further explicate that reports "should include total numbers (i.e., absolute data such as tons of waste) as well as ratios (i.e., normalized data such as waste per unit of production) to enable analytical comparisons."³⁷

Comparability also plays an important role in other GRI communications. This relates to the fact that the absence of *comparable* sustainability reports rather than the absence of sustainability reports per se was the major problem that gave rise to the GRI. According to the United Nations Environment Programme (UNEP), the main objective of the GRI is thus to "promote comparability of sustainability reports."³⁸ In practice, the GRI has sought to improve the comparability of GRI reports not only through the development of a unified reporting standard, but also through the development of technical solutions and software products that would enable report readers to more easily compare an organization's performance data with the same data of other corporations. In relation to this aspect, the GRI Stakeholder Council already identified in 2004 "clear gaps between report preparers and GRI-based report users" and recommended the development of a software format that "should facilitate the reporting process (make it easier), enhance the value of reporting (facilitate monitoring, management and governance of sustainability effects on business results and vice versa), and offer greater functionality to report readers and information users (e.g. search and benchmarking facilities)."³⁹

The development process of the G3 Guidelines thus envisaged a technical interface through which information on each indicator could easily be identified and compared with other companies. To this end, a document pre-

34. Global Reporting Initiative 2006, 16.

35. Global Reporting Initiative 2006, 16.

36. Global Reporting Initiative 2006, 14.

37. Global Reporting Initiative 2006, 14.

38. Cf. UNEP DTIE 2004.

39. Global Reporting Initiative 2004, 11.

pared by the GRI secretariat included screenshots of envisaged solutions “produced to give a first visual impression of a possible outcome.”⁴⁰ Yet even though the screenshots suggest that the development of a technical solution was already advanced in 2005, the GRI still does not offer a similar tool at the time of writing this article. Given the moderate complexity of the envisaged technical solution it is reasonable to assume that the slow progress is primarily due to political rather than technical factors. A plausible assumption is that most corporate GRI members have little interest in the public availability of easily comparable data on the sustainability performance of corporations—an availability that would, for instance, offer a very useful and inexpensive resource for campaigns even against corporations that are leaders on most, but laggards on particular indicators.

In sum, the GRI is aware that corporate disclosure is likely to be empowering if the reported information is valuable, accessible, comprehensible and comparable. Yet, while it acknowledges this assumption in its reporting principles, these principles remain soft. Moreover, the rhetorical emphasis on comparability is at odds with the organization’s own lack of progress in offering a simple, but possibly powerful technical solution that would allow report users and intermediaries to compare sustainability data more easily across time and individual business sectors.

Level Three: The Comparability of Actual GRI Reports

Beyond the GRI’s rhetoric and policies a central question is, of course, how actual GRI reports *fare in terms of criteria such as value, accessibility, comprehensibility and comparability*. To shed light on this question, we examine the sustainability reports of the ten largest automobile manufacturers (based on Fortune 500 data as of 21 July 2008) that compile a GRI report.⁴¹ The automotive sector lends itself for analysis since its manufacturing product is invariably linked with sustainability impact; since its performance and impacts are subject to frequent public debates; and since automotive companies are relatively advanced in their non-financial reporting practices. If anything, the automotive sector is thus a most-likely case for “sound reporting,” and trends in automotive GRI reporting practices might also hint at future developments in other sectors.⁴²

The underlying interest for many readers of GRI reports is a company’s sustainability. As one of the largest and most widely accepted environmental challenges lies in reducing greenhouse gas (GHG) emissions, we use the latter as

40. Global Reporting Initiative 2005.

41. Cf. Table 2. We exclude Toyota and Honda since their global sustainability reports do not follow the GRI guidelines; Robert Bosch was excluded since it focuses on automotive engineering rather than the whole manufacturing process. We refer to sustainability data published online (PDF or HTML) by April 10, 2009. Sources of information include the company’s own website as well as CorporateRegister.com.

42. Morhardt, Baird, and Freeman 2002.

Table 2
CO₂ Emissions of Car Manufacturers with GRI Reports

Company	Total CO ₂ emissions in million metric tons				Change in % (3 yrs)	Harm per value: CO ₂ per vehicle			Targets	Appl. Level
	'04	'05	'06	'07		'05	'06	'07		
General Motors	11.41	10.99	10.23	9.54	-13.2	No data	No data	No data	2005-10: -8%	Undeclared
Ford	8.1	7.7	6.4	5.8	-24.6	1.24	1.06	0.97	—	A
Daimler	—	—	3.89	3.78	—	Not comparable	Not comparable	Not comparable	Vague	A+
Volkswagen	—	6.02	6.07	6.46	+7.3	No data	No data	No data	—	A+
Nissan	2.54	2.42	2.46	—	-3.1	0.70	0.68	0.63	2005-10: -7%	Undeclared
Peugeot Citroën	—	Not comparable	Not comparable	—	—	Not comparable	Not comparable	Not comparable	—	B+
Fiat	—	Only direct emissions	Only direct emissions	—	—	No data	No data	No data	—	B+
BMW	1.17	1.31	1.28	—	+9.4	0.99	0.94	—	—	B+
Hyundai	1.62	1.82	1.78	1.90	+4.4%	Not comparable	Not comparable	Not comparable	2005-17: -10%	A+
Renault	—	—	—	0.69	—	No data	No data	No data	Vague	Undeclared

a proxy to assess corporate sustainability performance. The G3 Guidelines cover GHG emissions in three indicators: total direct and indirect CO₂ emissions by weight (EN 16); other relevant indirect GHG emission by weight (EN 17); and initiatives to reduce GHG emissions and reductions achieved (EN18). For each indicator the Guidelines give clear instructions about how to compile the data. In the case of EN 16, companies are required to “report total greenhouse gas emissions as the sum of direct and indirect emissions (. . .) in tons of CO₂ equivalent.”⁴³

A first look at EN 16 is promising: All ten automotive companies report in their GRI index full coverage of the indicator and the demanded information is relatively easy to locate in the actual reports. Yet Peugeot/Citroën and Fiat do not provide total data for their indirect emissions which makes them incomparable to the others. Of the remaining eight reports, only three split up their CO₂ emissions in indirect and direct emissions while the others only indicate total emissions. A comparison of the total values is further complicated by different reporting periods: data for the years 2005 to 2007 is available only by four producers (see also Table 2). Moreover, comparing a value of 9.54 million metric tons CO₂ by General Motors with 1.90 million tons by Hyundai is of limited value since production volumes vary. An alternative option might thus be to look at percentage change in order to measure improvements in sustainability, a figure that however rewards past inefficiencies. Leaving these aside, General Motors reports a decline in 13.2 percent while Hyundai’s emissions increased by 4.4 percent from 2005 to 2007. Hyundai explains the increase by reference to higher production levels, trial operations and, somewhat strikingly, “higher energy consumption for air conditioning due to global warming.”⁴⁴

A further possibility to evaluate the CO₂ emissions is to relate the value produced (e.g. manufactured vehicles) to the harm done (e.g. CO₂ emissions), thus allowing for a more comparable measurement of sustainable behavior.⁴⁵ While it is not explicitly demanded for the specific indicator, this approach is suggested by the G3 reporting principles.⁴⁶ Of the ten producers analyzed, six provide value-per-harm data. Of these, only three are comparable since the others either only show imprecise graphs differentiated by car, truck, van and bus (Daimler); only include direct GHG emissions (Peugeot); or provide CO₂ values in relation to financial profits, but not to vehicles produced (Hyundai). With regard to the comparable data, Nissan produces the lowest GHG emissions per vehicle (between 0.63 and 0.70 t CO₂/vehicle) while the values of Ford and BMW are comparatively higher (between 0.94 and 1.24 t CO₂/vehicle).

A final way of evaluating the sustainability of companies is to evaluate their targets and strategies for the future. In particular investors are aiming for forward-looking information.⁴⁷ Yet only about half of the companies state

43. Global Reporting Initiative 2006, Indicator Protocols Set: Environment.

44. Hyundai Motor Company 2008, 67.

45. Isaksson and Steimle 2008.

46. Global Reporting Initiative 2006, 14–15.

47. Global Reporting Initiative 2009a.

quantitative targets. In contrast, much more information is available in relation to the qualitative indicator EN 18 that deals with initiatives to reduce GHG emissions. Here, car manufacturers seem to outdo each other in reducing GHG emissions. General Motors enlists participation in seventeen voluntary energy and environmental management programs and respective targets and progresses. Nissan focuses on the use of alternative energy and improvements in transport efficiency. Others rely on better fuel efficiency. In many cases, these accounts however resemble corporate brand management rather than the disclosure of valuable information. For readers, it is hard to extract both the sincerity and the sustainability effects of any of the reported measures, let alone to make reasonable comparisons.

In terms of application levels, one in every three reports published in 2008 was declared as a Level-A report.⁴⁸ Despite the fact that comparability remains the most central goal of the GRI, Table 2 illustrates that even A+ reports within a single sector are no guarantee for enhanced comparability. Part of the reason might be that neither the reporting entity nor the assurance provider has a strong interest in interpreting the reporting principles and assurance guidelines in very strict terms. While reporters gain leeway from a broader interpretation, assurance providers risk losing their contracts to competitors if they interpret their task more strictly than their customers.

In sum, our brief analysis of actual GRI reports suggests that even though all companies claim full coverage of the GHG indicators, the information they provide is of limited practical use. A look at other indicators confirms this finding. Thus, quantitative data are not always gathered systematically and reported completely, while qualitative information appears unbalanced and often fails to include a credible assessment of the sustainability impacts of various measures taken by a reporting organization. These findings are consistent with a GRI study on human rights reporting, according to which only 7 percent of all reports examined complied with the information requirements of quantitative human rights indicators.⁴⁹

Level Four: Nongovernmental Organizations as Intermediaries

Finally, the role of intermediaries deserves a closer look. Arthur Mol has argued that a participatory and pluralistic political culture with a vigorous and independent civil society and media enhances the transformative potential of disclosure policies.⁵⁰ The role of such a civil society would be to make use of corporate reports and “translate” them into a format that can be used by different social groups to put pressure on corporations with a poor social or environmental per-

48. According to Global Reporting Initiative (2009h), of 1062 reports submitted in 2008, 30 percent are declared as level A; 24 percent as level B and 16 percent as level C; the remaining 30 percent are undeclared.

49. Global Reporting Initiative and Roberts Environment Center 2008.

50. Mol 2008. See also Mol 2010.

formance. The major example for such efforts originating from civil society is the US-based Toxics Release Inventory (TRI).

With regard to the TRI, Fung and colleagues argue that the source of its success is “the ease with which a wide variety of users—ordinary citizens, public interest groups, state agencies, journalists, and those in industry—can use its data to quickly and easily rank industrial facilities along a rough dimension of environmental performance.”⁵¹ As a result, various intermediaries fulfill the task of translating the information. Up to 2004, the Sector Facilitating Indexing Project (SFIP) run by the US government’s Environmental Protection Agency (EPA) compiled information on toxic releases in five different industries; it was later replaced by EPA’s TRI Explorer that allows a quick search based on geographical location, chemical released and industry.⁵² In addition, the nongovernmental Right-To-Know-Network provides access to databases, and the Environmental Defense Fund (EDF) has developed “Chemical Scorecards” that allow users to generate lists of firms that release toxics by industry, health risk, location, and other factors.⁵³ As a result, Fung and colleagues argue, virtually anyone can download site-specific, standardized, recent and user-friendly data on the toxic emissions covered by the TRI.⁵⁴ The instruments developed by the various intermediaries thus help to raise publicity and to exert pressure on polluting companies.

In contrast to the TRI, intermediaries are virtually absent in the GRI case. Financial service providers like FTSE4Good or DowJones Sustainability Index may use sustainability reports as a source for their decisions to include or exclude companies from their indices. But their analyses are targeted at investors and thus either inaccessible or of limited value for other stakeholder groups.⁵⁵

Individual analyses of the sustainability performance of individual industries also examine and rank companies according to criteria reported in their CSR reports. In the automobile sector, for instance, *Sustainability Value Research Ltd* has published two reports that compare the “sustainable value” of major automobile companies. The reports assign a positive value to a company that uses “its economic, environmental and social resources more efficiently than its market peers” and a neutral or negative value to those that do not.⁵⁶ Even though the studies come up with a single numeric result for each of the 17 companies examined, their results are hardly used by activists, possibly because the highly academic style of the report and the complex index itself do not lend themselves for campaigns in the same manner as, for instance, *Transparency International’s* Corruption Perception Index.

Our own interviews with representatives of different environmental and

51. Fung and O’Rourke 2000, 123.

52. For further information, see <http://www.epa.gov/triexplorer/>, accessed 17 November 2009.

53. For further information, see <http://www.scorecard.org/index.tcl>, accessed 17 November 2009.

54. Fung and O’Rourke 2000; and Van den Burg 2004, 372–375.

55. See for instance the critique in *Kritische Aktionäre* 2001.

56. Hahn et al. 2009, 5.

non-environmental NGOs confirmed the impression that CSOs are using the GRI reports only at the margins of their activities. A major reason seems to lie in the quality of reported data—in the words of David Levy and colleagues, NGOs are simply “not finding GRI data to be particularly useful in their campaigns.”⁵⁷ On the one hand, some NGOs welcome sustainability reporting and encourage companies to use the GRI as framework.⁵⁸ The quality of reported data however makes it costly for these organizations to use the reports in more standardized ways in their own advocacy tools. One of the few activities aimed at making information on a small set of core indicators of corporate social responsibility available in a transparent and standardized way is the German civil society project *Global Demos* whose initiators estimate that it would cost roughly 2 million EUR to get the project started for an initial period of three years. The budget expresses, among other things, the efforts required to bring existing information in a valuable, easily accessible, comprehensible and comparable format. In the absence of sufficient funding, the project currently remains stuck at the planning stage.⁵⁹

On the other hand, many NGOs remain more fundamentally skeptical. For these organizations, the problem is not so much that data from different companies is insufficiently comparable, but that data which profit-oriented corporations provide voluntarily is unlikely to represent the true social and environmental costs of corporate activities. A CorpWatch article that deals with sustainability reporting and the GRI expresses this opposition when its author argues that “it is difficult to accept transparency at face value if you believe corporate profitability and social responsibility are mutually exclusive.”⁶⁰

Conclusion

Collectively, the contributions to this special issue seek to shed light on the dynamics and the potential of transparency policies in global environmental politics. In this contribution, we explore the tensions that seem inherent in a particular claim associated with transparency policies, namely the claim that transparency policies “empower” the users of disclosed information vis-à-vis those who are asked to provide the information.⁶¹ Since these tensions are particularly relevant in relation to *voluntary* disclosure—why would corporations voluntarily provide data if the main effect was to empower others?—our analysis focuses on the GRI as the world’s leading voluntary corporate non-financial reporting scheme. Our analysis reveals tensions at different levels of activity.

First, the rhetoric of the GRI revolves around the notion of transparency

57. Levy, Brown and de Jong 2008, 4.

58. See for instance Friends of the Earth International undated.

59. For further details, see information at <http://global-demos.org/>, accessed 19 November 2009.

60. Meyer 2001.

61. For analysis of this claim with regard to voluntary disclosure in the extractive industries, see Haufler 2010.

but largely shies away from defining the concept in precise terms. While an explicit definition developed in the context of the *Sustainability Reporting Guidelines* acknowledges the transformative and empowering potential of corporate transparency, the organization rarely refers to this definition in its routine communications. In contrast, the analysis of the GRI's external communications point to at least four different "uses-in-practice" in which empowerment plays a much lesser role.

Second, in view of the GRI's policies, the reporting principles acknowledge that information disclosure can be a transformative instrument if it is guided by the criteria of value, accessibility, comprehensibility, and comparability. At the same time, the implementation of these principles is only weakly monitored. Moreover, the GRI fails to make progress in its efforts to use available technologies as a means to render corporate reports more easily comparable.

Third, actual GRI reports in the automotive sector claim to enable report users to evaluate the sustainability impacts of corporate activities; but the report content rarely lives up to such claims. The reports provide a host of information on sustainability-related aspects of corporate activities; but the information remains incomparable, and thus largely incomprehensible and of limited value to different audiences.

Finally, and maybe most surprisingly, intermediaries are virtually absent in the case of the GRI. While some CSOs have ranked corporations according to their sustainability reporting performance, they have thus far stayed clear from the more arduous task of developing a scorecard model based on the reported sustainability performance of GRI reporters. The GRI case thus displays a striking difference from the TRI in the context of which civil society activists took up a strong role as intermediaries, thereby helping to realize the empowerment and accountability gains which the disclosure regulations were designed to achieve.

What do these results imply for transparency policies more generally? Our analysis suggests three answers. First, our study confirms the results of earlier studies that have argued that the "GRI has had little impact in shifting the balance of power in corporate governance toward civil society."⁶² It thereby illustrates that the hopes associated with transparency policies are often unrealistically high. Transparency policies may work where information needs are limited—for instance to a range of locally released chemicals—and where the comprehensibility and comparability of reported information is not a major problem. In contrast, they are unlikely to work in the same way where information needs encompass a whole bundle of indicators, where the quality of data requires a higher degree of "literacy" on the side of report readers, and where issues of comparability are more complex.

Second, transparency policies are likely to provoke opposition from those who stand to lose in the "empowerment game." The failure of the GRI to move towards comparability and to establish a more user-friendly scheme for the

62. Levy, Brown and de Jong 2008, 2.

evaluation of environmental and social performance data can thus also be interpreted as an effect of corporate influence within the organization.⁶³ In short, this reading would imply that transparency policies can work best where civil society is already strong and where it has the opportunity to acquire the necessary resources for making use of enhanced transparency. In contrast, where civil society is either too weak to pressure for transparency or where it lacks incentives for doing so because it cannot make use of the additional information, the corporate sector can “tame” transparency policies, reduce their transformative threat, and tailor the instrument to its own needs.

Third, transparency policies may survive even in the absence of empowerment. Empowerment may thus be a major element in the justification of transparency policies; but it does not seem to be a requirement in their actual practice. The reasons for the persistence of transparency policies include the activities of “a large service industry comprised largely of sustainability consultancies and auditing firms” that has emerged in response to sustainability reporting and to its institutionalization in the Global Reporting Initiative.⁶⁴ But the observation that the GRI prevails despite its failure to “empower,” as an early mission statement held, “NGOs around the globe with the information they need to hold corporations accountable”⁶⁵ might also fit with Wolfgang Seibel’s notion of “low-performance-high-persistence organisations” whose main function does not lie in solving, but in “coping with” largely intractable social problems.⁶⁶ In the case of the GRI, such problems would include first and foremost the negative externalities of production and consumption patterns that are characteristic for advanced industrialized societies and hence difficult to change. From this perspective, the tension between the aspirations and the performance of transparency policies might mirror a more fundamental tension, namely the tension between our own desire to know (for instance, since wanting to know is in line with our self-identities and normative ideals) and our interest in “not knowing too much” (for instance, since new information might reveal inconvenient facts about our own valued lifestyles). It should be fruitful for future studies to further scrutinize the context conditions under which transparency does lead to empowerment and to put the “coping” thesis to a more rigorous empirical test.

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63. See also Brown, de Jong, and Lessidrenska 2009.
64. Levy, Brown and de Jong 2008, 14.
65. CERES 1997, cited in Levy, Brown and de Jong 2008, 10.
66. Seibel 1996; see also Brunsson 2002.

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