Independent Review Panel – Virtual Meeting 28-29 November
Letter to the Members in this Review Round

Dear Kumi Naidoo,

Thank you for submitting your accountability report to the Charter's Independent Review Panel for assessment. As in previous years we found that the quality of reports is generally improving, demonstrating greater institutional commitment and more evidence that mechanisms are working in practice. Before providing individual feedback on your organisation's report, allow us however to highlight three areas of general concern:

1.) *Embedding the Charter as a tool for organisational development (3.5)*

The disclosure profile 3.5 looks like a rather technical question on how the report is compiled and organisations tend to report accordingly. But it really asks for a process that is at the heart of what the Charter wishes to achieve: using the report as an opportunity for a cross functional systematic and critical reflection on how accountability is best implemented underpins the legitimacy and quality of your organisation's work. Accountability is all too often perceived as a defensive tool, when it is really a mechanism to pro-actively support organisational development. Please describe under 3.5 how you use the reporting process to embed accountability into your organisation. Against this background Members are also strongly encouraged to place the Charter logo prominently on their website and to further link to the Charter website, so that stakeholders know what to hold you accountable against.

2.) *Complaints Handling Mechanisms (NGO2)*

Having a fully functioning complaints handling mechanism in place is the only Minimum Standard for Charter Members so far. The Panel is very concerned about rather slow progress by many Charter Members to comply with this. We have therefore decided to ask the Charter Board to look into implementing a timeline and sanctions policy for compliance. In our view the leeway should be no longer than two to maximum three years after a Minimum Standard has been adopted. You find examples of well-functioning complaints handling mechanisms in the Good Practice document on the Charter website, capturing good examples from this and previous reporting rounds.

3.) *Succinctness and communication quality*

There is a danger that accountability standards develop a life of their own and become increasingly complex and detached. We have noted that Charter reports tend to get longer without necessarily providing more relevant information. It is important however to use these reports to actively communicate internally and externally how accountability is part of the DNA of your organisation and strengthens the quality of your work. In order for these reports to be read, we suggest that they should have a maximum of 40 pages. For each GRI indicator it is sufficient to report three things:

a) Do you have policies and processes in place to address the issue?
b) Do you have evidence that it is embedded in systematic practice?
c) Is there evidence to show that this has led to improved quality of work?

Sometimes the Panel asks for more information. We are trying to do so only where it is necessary, and we encourage you to be as succinct as possible, and take the above three parameters as guidance. Also try to avoid repetition and where illustrations are given, please keep these brief. Organisations who wish to merge their accountability report with the annual report are encouraged to additionally provide a separate and

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more reflective addendum relating to the Charter if the annual reports do not embrace that due to a desire to be more promotional.

Organisation-specific feedback to Greenpeace International:
The report is comprehensive, easy to read and provides very good information. As an advocacy organisation which places high value on decentralisation and the unpredictability of its campaigns, Greenpeace organisational approach is different to a lot of other Charter Members. Globally agreed, written policies, which are upheld by all national organisations in a comparable manner, are not the norm within Greenpeace. The organisation rather states an aspired principle at the beginning of each indicator and then gives a lot of anecdotal evidence from the various national entities. Although these examples bring Greenpeace's approach to life, the organisation is urged to implement at least a fully functioning complaints handling mechanism speedily across all national offices, since this is a Minimum Standard for every Charter Member. Information on how strong and consistent accountability mechanisms can be upheld without written policies and compliance assessment should be given in the next report. Progress on commitments made in earlier reports has been somewhat patchy (see GAP Analysis Table at the end). It is positively noted that the organisation already reported on a number of indicators, which will only be mandatory as of 2014.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website, along with your report. You can find the reports that were previously reviewed on the Charter website. However, should there be errors of fact in the feedback above or in the note below we would of course wish to correct these before publication. Please share these comments or corrections by 20 January 2014.

If you have any other feedback or comments on our work, please share with us by sending them to the Charter Secretariat. We would very much like to hear your views.

Yours sincerely,

Janet Hunt · Wambui Kimathi · Tony Tujan · Richard Manning · Louise James · Brendan Gormley

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Review Round October 2013
Cover Note on Accountability Report
Greenpeace International

Reporting period: Calendar year 2012

PROFILE DISCLOSURE	
Profile	**Comments**
Strategy and Analysis	
1.1	*Partially addressed* The statement by the CEO provides interesting information about the overall vision of the organisation, but no clear commitment to accountability as an important driver to continuously improve the quality of Greenpeace' work.
Organisational Profile	
2.1 – 2.8	*Fully addressed*
2.9	*Fully addressed* Significant changes during the reporting period are mentioned. The Panel looks forward to being informed on the implementation of Greenpeace's new way of working and on the systems that are currently being set up to monitor and report on the organisation's progress.
2.10	*n/a*
Report Parameters	
3.1 – 3.4	*Fully addressed*
3.5	*Fully addressed* The answer includes information about the process for defining report content. More information on who is involved in collating the data for the report who is ultimately responsible and how this whole process is used to better embed accountability as a quality assurance tool in the organisation is welcome in the next report.
3.6	*Fully addressed* The boundaries of the report are mentioned in the answer. Please be explicit on what is *not* covered by this report e.g. joint ventures, partner activities or country representations.
3.7	*Fully addressed*
3.8	*Not addressed* Concerning the basis for reporting on joint ventures etc., the organisation states that the report "refers" to national entities due to its governance structure. Please clarify in which way national subsidiaries specifically contribute to the content of this report.
3.10 – 3.10	*Fully addressed*
3.11	*Fully addressed* The answer includes information about significant changes from previous reporting periods. The Panel looks forward to progress report on the global management information system and the introduction of Management and Compliance Standards in the next report. This sounds like a good opportunity to also embed consistent good accountability practices of the Charter throughout the entire organisation.
3.12	*n/a*
3.13	*Fully addressed*
Governance, Commitments, and Engagement	
4.1 – 4.3	*Fully addressed*

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4.4	*Fully addressed* Suggestions of mechanisms for internal stakeholders to provide recommendations are included. More information on how Greenpeace ensures a meaningful dialogue and where this has triggered positive management response is welcome for the next report.
4.5 – 4.6	*Fully addressed*
4.7 – 4.13	The numbers a mixed up. Please make sure to stick to the exact GRI numbering system in the next report. The following numbers are the GRI numbers and not the ones used in the organisation's report.
4.8	*Fully addressed*
4.10	*Partially addressed* The answer provides information about evaluation of the governance body. The organisation states that Greenpeace encourages national and regional offices to evaluate the governance body but there are no policies in place.
4.12	*Not addressed*
4.14 – 4.15	*Fully addressed*
4.16	*Fully addressed*
4.17	*Not addressed*

PERFORMANCE INDICATORS
Program Effectiveness
NGO1 – Stakeholder involvement *Partially addressed* The organisation states that it does not have organisation-wide policies on the involvement of affected stakeholders because its' very way of working is based on unpredictability for opponents. The organisation does however provide anecdotal evidence of stakeholder involvement, where this was useful. But there are no policies, clarifying the minimum level of involvement that stakeholders are entitled to if affected by Greenpeace's actions. Involvement therefore remains arbitrary and patchy and the Panel would welcome to hear more on how Greenpeace ensures consistent and reliable stakeholder engagement where they are affected by Greenpeace' actions.
NGO2 – Mechanisms for feedback and complaints *Partially addressed* It is reported and appreciated by the Panel that the number of national and regional offices which have a complaints handling monitoring in place has increased from last year. However it is rarely based on a written complaints handling policy giving stakeholders the right to complain and be attended to within a certain time frame etc. Since a fully functioning Complaints Handling Mechanism is the only Minimum Standard required by Charter Members so far, Greenpeace is strongly encouraged to progress on this issue in the coming year.
NGO3 – Programme monitoring, evaluation and learning *Partially addressed* The organisation states that it developed a Monitoring, Evaluation and Learning Unit in 2012 to define a global Evaluation Framework. In 2013 this will be rolled out for the most frequently performed evaluation types. Meanwhile examples for evaluation approaches by the different national entities are given. More information on how the new evaluation frame will inform strategic and not just incremental decisions will be welcome.
NGO4 – Gender and diversity *Partially addressed* The organisation states that it will start a global process to assess diversity in 2013 with the aim to start a process of greater inclusion also as a strategic opportunity to tap into a

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greater network of supporters. Examples of HR training and diversity initiatives in some of the national and regional offices are positively noted.

NGO5 – Advocacy positions and public awareness campaigns
Partially addressed
The answer provides information about the organisation's solid process to ensure a robust evidence base for its policy positions. It does not provide any information on the criteria used to prioritise certain advocacy topics above others and how strong accountability processes around advocacy work ensure continuous improvement of its quality. It does not describe the organisation's process to identify corrective adjustments of advocacy positions where these become relevant.

NGO6 – Coordination with other actors
Partially addressed
The organisation states that it does not have a standardised process for coordinating its activities with other actors since each campaign is individual. Even if this is the case, there are certain issues which will be similar for all advocacy work e.g. conducting a situational analysis to identify which other actors are already active in the same field or region, how to avoid duplication and how to best leverage each other's impact. Good examples of alliances with other actors are however included in the answer. Additional information on Greenpeace International's relationship with companies is also welcome in the next report.

Economic

NGO7 – Resource allocation
Partially addressed
The answer provides detailed information about the resource allocation. However it does not say what standards are in place in order to track the use of resources. More information is also welcome on how these systems have improved the effectiveness of Greenpeace.

NGO8 – Sources of funding
Fully addressed

EC7 – Local hiring
Fully addressed
The answer provides information about local hiring in the organisation, but no policy exists.

Environmental

EN16 – Greenhouse gas emission by weight
Fully addressed

EN18 – Initiatives to reduce greenhouse gas emission
Fully addressed

EN26 – Initiatives to mitigate environmental impacts
n/a

EN29 – Significant environmental impacts of transporting products
Fully addressed

Labor

LA1 – Total workforce
Fully addressed

LA10 – Workforce training
Partially addressed
The organisation states that it does not calculate the training hours per employee.

LA12 – Performance and career development reviews
Fully addressed
The Panel would welcome an increase in the number of employees receiving performance and career development reviews, since this is regarded as a key component of good internal accountability practice. Currently it is reported to be at 58%.

LA13 – Composition of workforce and governance bodies
Fully addressed

Data about the composition of governance bodies are very well displayed.

Society
SO1 – Impact of operations on communities
Partially addressed
The answer provides good and strong examples of assessing the impact Greenpeace interventions have had on local communities. It does not describe any ex ante procedure or policy however, which all national entities have to follow, to ensure that the interventions the organisation undertakes are sustainable in the communities.
SO3 – Anti-corruption training
Partially addressed
Greenpeace has finalised and approved its first anti-corruption policy in 2011. In 2012 the role out and training of staff has started. Evidence that this training has been successful (i.e. staff is aware of this policy and uses it) and Greenpeace level of fraud resilience has improved is welcome for the next report. A link to the policy should also be provided.

Product Responsibility
PR6 – Ethical fundraising and marketing communications
Fully addressed

Greenpeace
Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member's report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel. Please note that the rows where commitments cannot be identified can be deleted from the table.

GRI - Performance Indicators	2011	2012	2013	2014
Program Effectiveness				
NGO2: Mechanisms for feedback and complaints in relation to programs and policies.	**In report covering 2011**: The organisation will look into the complaints handling mechanisms across the organisation in 2013.	**In report covering 2012:** No process reported		
NGO3: System for program monitoring, evaluation and learning.	**In report covering 2011**: *"We are currently in the process of developing internal Monitoring & Evaluation mechanisms that will more clearly link our actions with desired outcomes."*	**In report covering 2012:** *"Standardised approaches to evaluation and learning, including a policy framework, will be developed and rolled out so that by the end 2013 all offices have the capacity to implement these approaches for the most frequently performed evaluation types."*		
NGO4: Measures to integrate gender and diversity into program.		**In report covering 2012**: *"In 2013 we will be starting a global process to assess diversity within the organisation globally, as a first step towards designing a process to increase diversity within the organisation."*		
Economic				
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Environmental				
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Labor				
LA12: Percentage of employees receiving regular performance and career development reviews.	**In report covering 2011**: *"We will be putting effort into increasing the awareness among managers of the importance of these reviews, and hope that this number will increase by next year's report."*	**In report covering 2012:** No process reported		
Society				
SO3: Percentage of employees trained in organization's anti-corruption policies and procedures	**In report covering 2011**: *"Greenpeace finalised and approved its first anti-corruption policy during 2011 which means that by the end of the year not all offices had been able to train staff: just 181 members of staff globally have been trained. However the document has been distributed to all staff, and trainings will be rolled out over the coming year."*	**In report covering 2012:** Exact the same statement mentioned as in 2011.		
Product Responsibility				
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