

31 March 2011

Dear Kumi Naidoo, Radboud van Delft and Linda Selvey,

We are writing to you as members of the Independent Review Panel of the INGO Accountability Charter, in order to give you feedback on the Report which you have submitted.

We should like first of all to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular:

- How complete is the report in relation to the guidelines used?
- How strong is the evidence given for the self-assessment that each organisation has conducted?
- What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it?

On **completeness**, we want at the outset to recognise the demanding nature of many of the GRI requirements. Many organisations found it difficult to respond to some of the more detailed requests for information. We attach a note by the Secretariat that goes through the shortfalls against the reporting template in detail. While you may find this of value, we should like to emphasise that we do not consider that, at least at this stage of the exercise, it is essential to meet every element of the template – which we recognise may in some cases be overly demanding, particularly for smaller institutions. We have however noted below areas where we felt that your organisation might wish to invest more attention in your next report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful).

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example an opening statement signed by the Chief Executive); of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and of a systematic concern with accountability, including recognition of areas for further work. We would hope that progress in such areas would be high-lighted in future reports.

We are enclosing for your information some examples of what seemed to us good practice in responding to some individual indicators, based on the GRI framework.

Of the 17 reports made available to us, 10 were from organisations which offered responses both from international and national bodies within the same overall organisation. In such cases, we are writing to both levels in a single letter.



Reflecting on these cases, we felt that for such organisations there were three ways in which such reporting could most easily be rationalised both to permit a good understanding of the overall organisation's approach to accountability and to limit duplication:

- 1. There could be one global report from the international arm of the organisation, drawing on, as appropriate, evidence of action by national chapters/affiliated organisations. Should such a global organisation already produce an 'Accountability Report' or similar, this should so far as possible either follow the broad structure of the GRI template or at least permit ready cross-reference to it¹.
- 2. There could be a GRI-standard report at global level (as under 1), but national chapters/affiliates could also incorporate a GRI-standard report into other documents that they are already producing. Such reports should again either follow the broad structure of the GRI template or at least permit ready cross-reference to it.
- 3. There could be GRI-standard reports at both global and national levels, where this was seen to add value.

Organisation-specific feedback to Greenpeace International

To all three Greenpeace organisations:

As there are several overlaps between the reports submitted by the three Greenpeace organisations, we recommend that in future you consider compiling one joint report for the entire organisation. In order to make it more grounded, you could draw on evidence and experience from the national level, particularly by citing examples where you have and have not been successful. We feel that the **institutional commitment** came out more strongly in the international report than in the national ones. We also recommend you to look more deeply into NGO1, since this indicator was not addressed sufficiently in the reports.

To Greenpeace International:

The **completeness** is good. We appreciate your response on NGO7 and EN16 and see these as good practice for other organisations (see "Good practice on GRI Reporting" attached to this letter). The report would have been stronger if it had contained more examples and supporting **evidence**. The **institutional commitment** to accountability comes over strongly in the statement and we commend this.

To Greenpeace Australia-Pacific:

We felt that this report was relatively weak with respect to both **completeness** and the **evidence** provided.

To Greenpeace Netherlands:

This report was good both in terms of **completeness** and the **evidence** provided. We appreciate the response on NGO3. The response on training could be an example of evidence used in the international report. There is sign of good **institutional commitment** to accountability in the report.

¹ Such references should be to particular paragraphs or pages of a report – so that they do not need to be deduced from lengthy sections of the report.



Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. However, should there be errors of fact in the feedback above or in the more detailed Secretariat note on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response by 28 April 2011.

Yours sincerely,

Wambui Kimathi

Richard Manning

Gavin Neath