

17 January 2014

Mr Rob Steele
Secretary-General
International Organization for Standardization
1, ch. de la Voie-Creuse
CP 56 - CH-1211 Geneva 20
Switzerland

Dear Mr Steele,

Re: Systematic review of ISO 26000

The International Organisation of Employers (IOE) has been actively involved in the development of ISO 26000 since the outset. Currently, the IOE is engaged in raising awareness, in facilitating the exchange of experiences of the guidance standard, and in providing information and advice on ISO 26000 to our 150 members around the world. Moreover, the IOE has been represented by Adam Greene (USCIB) in the ISO 26000 Post Publication Organization (PPO) Stakeholder Advisory Group. This role will now be taken over by Matthias Thorns, Senior Adviser at the IOE.

IOE members and their member companies appreciate ISO 26000 because:

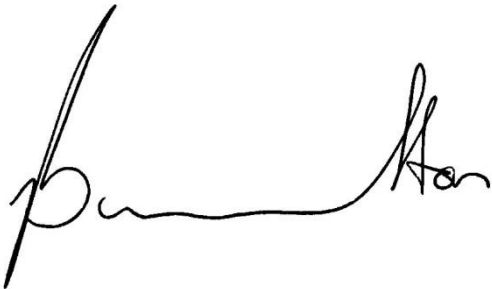
- It is a guidance standard, and, as such, not subject to audit or certification;
- it reflects broad international consensus on the elements of social responsibility, drawn from authoritative international instruments;
- it serves as a good basis for cross-border discussions on social responsibility;
- it provides good orientation for starting a social responsibility journey;
- it contains a good basis for engaging in stakeholder dialogue and other external discussions;
- it is flexible: all kinds of users, not just companies, may draw upon as much or as little of the guidance as necessary to help inform their own social responsibility policies or practices.

In view of these positive experiences, the IOE strongly advocates maintaining ISO 26000 as its stands. Despite difficulties, particularly with regard to the misuse of ISO 26000 for certification, the length and complexity of the standard and the fact that the guidance is clearly oriented towards larger organisations, the IOE believes that ISO 26000 has the added value of guiding all kinds of organisation in their social responsibility. Any revision of ISO 26000 would break the hard-won consensus and greatly jeopardise its standing and impact.

The IOE believes however that the Systematic Review should be used to confirm the character of the ISO 26000 as a guidance standard, and to advocate for the preservation of its integrity. Moreover, as communicated to you earlier this year, the fact that the PPO for ISO 26000 is not properly structured, nor mandated to provide best guidance for the implementation of ISO 26000, has resulted in rather disappointing work outcomes. This reflects also on ISO. Thus, the Systematic Review should be used to improve the governance of the PPO. We are convinced that if the PPO were to be properly structured as a truly multi-stakeholder initiative and mandated, the full potential of ISO be maximised.

The IOE is committed to continuing working in close cooperation with ISO in the promotion of ISO 26000 and in addressing the issues arising from the Systematic Review. We would like to inform ISO member organisations as well as the ISO TMB of the IOE's position on this process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brent H. Wilton', written in a cursive style.

Brent H. Wilton
Secretary-General