



International Organisation of Employers
Organisation Internationale des Employeurs
Organización Internacional de Empleadores
The Global Voice of Business

Dr Zhang Xiaogang (President) and Mr Sergio Mujica (Secretary-General)
International Organization for Standardization (ISO)
ISO Central Secretariat
BIBC II, Chemin de Blandonnet 8
CP 401, 1214 Vernier,
Geneva, Switzerland

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Dear Dr Zhang and Mr Mujica,

Joint letter from ITUC and IOE concerning a proposal to create a new ISO Technical Committee on Social Responsibility

We are writing to you to convey our strong opposition to a proposal for ISO to create a new Technical Committee on Social Responsibility.

We recognise that ISO makes a contribution to the field of responsible business conduct, including on human and labour rights, such as through the promotion of the ISO 26000: 2010 guidance. However, we are very concerned by the proposal, submitted by the Swedish ISO member SIS, to create a new Technical Committee on Social Responsibility that will focus on: general methods for social responsibility, human rights, fair operating practices, consumer issues, sustainable consumption, and company involvement and development.

This far-reaching proposal, which ISO members will vote on by 10 October 2017, would likely create a lot of work and output, including in the area standardization, guidance and possibly certification. This is unlikely to make a positive contribution to the field of human and labour rights and, instead, it risks creating divergence with existing standards and absorbing resources away from current implementation efforts.

From an organisation perspective, while ISO is effective in convening small expert groups to address discrete technical issues, its model and membership is not appropriate for addressing larger social issues, including on human rights, which require truly representative processes that can balance the competing interests of different stakeholders.

In addition, there is real concern that this proposal would result in the privatisation of social standards. Authoritative international standards and guidelines – such as the UN Guiding Principles on Business and Human Rights, ILO Conventions, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the OECD Guidelines for Multinational Enterprises – have been carefully developed, often in multi-stakeholder processes, and are publicly-available at no cost. Whereas, ISO standards are subject to copyright protections and must be purchased. Furthermore, ISO engagement with external organisations in their development tends to be last-minute, and it is very resource-intensive and costly for others to engage with ISO given its complex structure, membership and processes.

From a substance point of view, there is big concern that this proposed Technical Committee would undermine and create divergence of universally-accepted and carefully-negotiated standards and approaches on social issues. Existing standards on human and labour rights have been painstakingly developed by Governments and other stakeholders, including trade unions and employers, over a number of years. Specifically, there is a clear consensus not to certify companies' human rights performance, which - from past experience of engaging with ISO - we would expect such a Technical Committee to seek to do.

Finally, the proposal *itself* raises a number of questions and concerns. On the one hand, it says that the work of the Technical Committee will not "*replace or negate*" existing standards, but help "*companies and organisations...to decipher and align tools and definitions*". On the other hand, it goes on to say that the Technical Committee's work will focus on "*requirements, guidance and specifications*" and "*combining areas that have been standardized or are in need of standardization*." Unfortunately, as already mentioned, we do not consider ISO to have the necessary expertise, capacity or mandate to decipher and align tools and definitions in social fields such as human rights.

Added to this, the fact that such a Technical Committee would be open-ended raises questions about the ambition, volume and scope of its intended work. We note that previous ISO committees, which were challenging to engage effectively with in practice, were disbanded after the creation of the relevant standard / guidance.

At the same time, the proposal neither explains why there is a need for standardization in the field of social responsibility, nor does it explain where the demand is for such a new Technical Committee. When the proposer says that "*the proposal was developed after having consulted with stakeholders in several ISO member bodies*," this reinforces our concerns of the under-representative nature of ISO. The proposal does not give any information on there being outside support for such a Technical Committee. Linked to this, when the proposal says that "*international organizations are likely interested in participating in a new Technical Committee*" this letter should serve to demonstrate that external organisations feel compelled to make our views known early on because of our serious concerns about this proposal and the output it could generate.

In conclusion, we appreciate ISO's interest in the field of social responsibility. However, we regret that, in our view, ISO and its standardization bodies do not have the mandate, the representation, the necessary expertise, or the capacity to interpret and create new standards on social responsibility.

We would strongly urge ISO and its members not create a new Technical Committee on Social Responsibility and to refrain from revising existing standards such as ISO 26000:2010 and we would ask that you inform ISO members around the world about our position.

Finally, we ask that you kindly keep us informed on any developments regarding ISO's work on social responsibility.

Yours sincerely,



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International Trade Union Confederation
(ITUC)



Linda Kromjong
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