A Framework for Improving Sustainability Impacts

ISEAL Good Practice Guide for Sustainability Systems – Consultation Draft v0.1

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Introduction

Sustainability systems and their partners aim to solve the most pressing sustainability challenges of our time, from the climate emergency and biodiversity crisis to human rights and persistent poverty. Sustainability systems have traditionally contributed to these goals by leveraging market signals to drive improvements in production and supply chain performance. However, we recognise that these global sustainability challenges are complex problems that require many different stakeholders to play their respective roles in bringing about durable and scalable solutions.

Determining the best strategies to bring about lasting improvements in sustainability performance is a core challenge for sustainability standards and similar systems. Sustainability systems are increasingly experimenting with a wide range of strategies to reach their goals. However, the effectiveness of these strategies is highly dependent on the context in which they are applied. While one approach may achieve good results in a particular place, the same approach may have little effect in a different context. This Good Practice Guide provides a framework for sustainability systems to consider how best to drive sustainability impacts through the choice of effective improvement strategies.

The framework presented in Figure 1 summarizes the steps that a sustainability system can take to understand the context in which it is operating and how that impacts its choice of strategies and partnerships. Because complex systems are dynamic, the framework is structured around a learning feedback loop in which sustainability systems can assess how well their strategies are working and why, in order to both adapt and improve the effectiveness of those strategies and to communicate about the progress that is being made. This framework informs the structure of this good practice guide.

Scope

This Good Practice guide applies to any sustainability system (sustainability standard or similar systems) that is supporting improved sustainability practices through market-based interventions. It applies to all interventions that aim to improve enterprise sustainability performance, either directly or indirectly.
1. Understanding Context

The effectiveness of a strategy to incentivize sustainability improvements will be affected by the context in which it is applied. From the political context to the maturity of the market to local norms and customs, many factors will influence both the immediate uptake of sustainability practices and the long-term ability for strategies to be scaled effectively. Before implementing any strategy, it is important to have a good understanding of the nature of the issue you are aiming to address and to establish what factors influence your target group behaviour. A thorough context analysis requires you to gather enough information to be able to answer the following questions:

- What are the most important sustainability challenges and the root causes of those challenges?
- What are key trends and opportunities for change?
- Who are the most influential stakeholders that need to change their actions in addressing the challenges?
- What are the main drivers for their actual behavior? What constraints do they have? Which incentives and capabilities exist for them to change?
- Who or what are the main change agents?
- Which initiatives already exist and how do they relate to each other and the key stakeholders?

1.1. Problem Definition

As a first step in understanding the context and how best to respond to it, sustainability systems should gather enough information to identify the significant sustainability challenges in a place and the root causes of those challenges. The nature and complexity of the sustainability challenges will have implications for your choice of strategies, e.g. if the root cause analysis shows a range of contributing factors, it is likely that a focus on more systemic and collaborative strategies will be necessary.

Typical methods to understand the nature of an issue include:

- Problem analysis: understanding the status and perceived importance of key sustainability issues through literature review, existing data sets, and stakeholder consultation
- Root cause analysis: identifying the root causes of the key issues. A typical root cause analysis searches for causal relationships of a defined problem. It identifies the underlying issues and factors that contribute to these issues. It also identifies the key stakeholders related to these issues and factors.

1.2. Mapping influence

Figure 2 shows how multiple factors and stakeholders act on an enterprise’s ability to improve its practices. The sustainability performance of individual enterprises results most immediately from their awareness and capacity to act. Their ability to improve is informed, in turn, by the structure and maturity of the markets and by the strength of the institutions that support them directly. Finally, the outer ring brings together the range of stakeholders and systems that influence the broader context in which the enterprise operates, from consumer demand to the effectiveness of government institutions.
Understanding the specific context in which you are operating requires in-depth information about the stakeholders and conditions that are likely to influence success. Methods which can be used to obtain a better understanding of the above contextual factors include:

<table>
<thead>
<tr>
<th>Context</th>
<th>Methodology Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>Stakeholder mapping and power analysis, assessment of existing sustainability initiatives</td>
</tr>
<tr>
<td>Market</td>
<td>Market studies (including production, trade, and price dynamics); value chain analysis (including value chain governance);</td>
</tr>
<tr>
<td>Landscape</td>
<td>Land use change, drivers, and vulnerability analyses</td>
</tr>
<tr>
<td>Public sector</td>
<td>Policy environment and political economy analyses</td>
</tr>
<tr>
<td>Finance</td>
<td>Financial sector analysis (e.g. on actors, relationships, products, policies)</td>
</tr>
<tr>
<td>Multi-stakeholder</td>
<td>Capability and credibility assessments</td>
</tr>
</tbody>
</table>

Table 1: Methods for gathering information about context

1.3. Assessing current state of market transformation

It has been hypothesized that wide-scale change, including sector transformation towards more sustainable practices, follows different phases. Knowing the current phase of development in a sector can help you to understand why certain actors tend to adopt certain approaches or not. NewForesight identifies four phases of market transformation: inception, first mover, critical mass, and institutionalization. Each phase is characterized by change agents and drivers, barriers and opportunities for change (see Table 1). Understanding which phase of market transformation you are in will help to identify which stakeholders are likely to drive change and what types of strategies will resonate.


<table>
<thead>
<tr>
<th>Inception</th>
<th>First Mover</th>
<th>Critical Mass</th>
<th>Institutionalization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denying sustainability issues</td>
<td>Sustainability as option</td>
<td>Sustainability is important</td>
<td>Sustainability is the norm</td>
</tr>
</tbody>
</table>

**Drivers**
- A crisis, public pressure
- Continued NGO pressure, sustainability as competitive advantage
- Need to collaborate to sustain business models and to influence key stakeholders
- Creating a level playing field with sustainability as license to operate

**Main change agents**
- Civil society, media
- Donors, standard organizations, first mover companies
- Multi-stakeholder platforms, industry groups, donors
- Governments, industry lobbies

**Dominant spaces**
- Market (but landscape is also possible)
- Market, multi-stakeholder
- Markets, finance, multi-stakeholder, landscape
- Public sector, landscape

**Typical approaches**
- Research, projects to create best practices
- Certification, corporate sourcing programs
- Convening platforms, non-competitive and systemic investments
- Regulation and public sector investments

**Limitations for impact**
- Projects are isolated and temporary
- Proliferation, fragmentation and competition of standards and company programs
- Lack of trust, resistance to leave business as usual
- Low performance thresholds, poor enforcement, inflexibility to include new issues

**Opportunities for progress**
- Develop best practices, standards and promote front-runners
- Create coalitions, sector strategies, viable business cases
- Ensure a consistent message to all stakeholders and lobby towards policy makers
- Institutional strengthening

Table 2: Four phases of market transformation (*Adapted from NewForesight (undated) and Solidaridad (2012))*

2. **Understanding Improvement Strategies**

Improvement strategies are designed to promote the uptake of better practices through incentive mechanisms and enabling conditions that provide the motivation and opportunity for continued improvement. Impact studies often show that the uptake and direct impact of sustainability systems is highly influenced by contextual factors in the broader environment in which they operate. Improvement strategies can focus on influencing the actions of target enterprises directly (*value chain strategies*) or can seek to influence the enabling environment in which those enterprises operate, to create the system conditions for the enterprises to improve (*systemic strategies*). Whether sustainability systems choose to strengthen value chains or system conditions, or a combination of both, they can seek to drive improvement individually, in partnership, or through multi-stakeholder initiatives.

Value chain strategies and systemic strategies are also highly complementary. Systemic strategies can create enabling conditions for the success of value chain approaches, including stakeholder alignment and coordination, knowledge, services and tools, investments and finance, leveling the regulatory playing field, and shifts in values and norms. Similarly, value chain strategies can develop proofs of concept which inspire collaborative action and systemic change. Collaborative action, in its turn, can inform systemic strategies, particularly through lobbying and advocacy activities.
2.1. Value chain strategies

Value chain strategies target enterprises directly, aiming to improve the practices and performance of those enterprises. Types of value chain strategies include:

- **Standards.** Standards or performance requirements underpin all sustainability systems. They define norms or goals for enterprises and value chain actors. They can be practice- or outcome-based and have binary, stepwise improvement, or continual improvement compliance models. Standards can be set for individual actors or a group of actors (e.g. through a group certification or jurisdictional approaches) and are generally combined with assurance, chain of custody and claims models.

- **Market Incentives.** Market incentives such as price premiums, minimum prices, and fair trading practices reward target groups for the effort of improving or reaching the desired level of performance.

- **Support mechanisms.** This refers to interventions which help target groups to improve, including capacity building, information services, decision-making tools, access to inputs and technology, and financial support and services. Support can target standards compliance but can also inform a wider set of improvements.

2.2. Systemic strategies

Systemic strategies can address root causes of unsustainable practices (capacities, policies, institutions, stakeholder relationships, etc.) and have effects that go beyond certified areas of operation. Although changes within the enabling environment are more difficult to realize and take more time, these changes can have wider and more systemic effects than the direct impact of certifying enterprises and supply chains. Improvements in the enabling environment can raise the performance of many more actors than certification currently achieves. Types of systemic strategies include:

- **Knowledge management and other support services:** Developing and sharing knowledge products such as research papers, tools, manuals and training curricula or funds to implement sustainable practices often benefiting producers beyond certified operations.

- **Service sector development.** A viable service sector creates access to services that target groups require to improve (e.g. training, inputs, finance)

- **Private or public sector engagement:** Engaging with the private or public sector to influence their policies and the focus of their investments to facilitate improvements of target enterprises
• **Public campaigns**: Raising awareness among consumers on a specific issue in general or in a particular sector or region to spur action by companies or governments.

• **Multi-stakeholder dialogue**: Facilitating dialogue among government, civil society, industry, and producing enterprises to promote trust, alignment, collaboration and accountability at a geographic or sector level.

### 3. Implementing your Strategies

Sustainability systems are likely to have a range of value chain and systemic strategies that they commonly implement either individually or in collaboration with partners. In some cases, your choice of strategies varies by location or context, but mostly it is about having a toolbox of strategies that collectively contribute to your sustainability mission. This section provides a step-by-step approach for being more intentional about how you choose which strategies to implement where, and how you improve or adapt those strategies over time.

#### 3.1. Goal setting

The first step is to define your sustainability goals which will, in turn, influence the relevance of specific strategies. Sustainability systems should formulate specific goals in relation to the sustainability issues and root causes identified in the context mapping. The nature and ambition of the goals will help to inform which interventions should be prioritized. The following table provides guidance on the implications of different factors informing your choice of goal for the types of interventions that are likely to be appropriate.

<table>
<thead>
<tr>
<th>Factor</th>
<th>Description</th>
<th>Scale of change</th>
<th>Implications for approach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Thematic focus</strong></td>
<td>What sustainability impacts are we seeking to achieve? E.g. no-deforestation, water conservation, labour rights, improved livelihoods, food safety</td>
<td>e.g. Sustainable production &amp; consumption</td>
<td>Favours market approaches, with complementary approaches targeting other actors</td>
</tr>
<tr>
<td></td>
<td></td>
<td>e.g. Ecosystem integrity &amp; conservation</td>
<td>Favours landscape and public sector approaches, complemented by market approaches</td>
</tr>
<tr>
<td><strong>Geographical scale</strong></td>
<td>How broadly are we aiming to have an impact? E.g. at a jurisdictional scale, state-level, country, sector, globally</td>
<td>Local</td>
<td>Favours landscape and ‘isolated’ market approaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>National / international/ Global</td>
<td>The larger the scale, the more it favours public sector and multi-stakeholder approaches</td>
</tr>
<tr>
<td><strong>Systemic focus (breadth)</strong></td>
<td>Who are our key target groups? E.g. specific segments of producers, value chain actors, consumers</td>
<td>Narrow</td>
<td>Favours market approaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Broad</td>
<td>Increases relevance of landscape and public sector approaches</td>
</tr>
<tr>
<td><strong>Timescale</strong></td>
<td>What are our timelines for achieving the desired impact and scale?</td>
<td>Short</td>
<td>Favours market and finance sector approaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Long</td>
<td>Favors multi-stakeholder and public sector approaches</td>
</tr>
</tbody>
</table>

Table 3: Factors informing goals and their implications for strategy
3.2. Taking enabling conditions into account

The problem and root cause analysis that informed the goal setting already identified where changes are needed. However, the effectiveness of specific interventions depends to a large extent on the specific context. Some contextual factors increase the potential effectiveness of your intervention, while others reduce them. For example, when the goal is to promote sustainable production at scale, a focus on markets can be very relevant. However, where the market is highly fragmented, it can be harder to influence market actors directly. This can make other strategies potentially more relevant to influence market behaviour.

Once you have a good sense of the context in which you are working or planning to work and have defined your goal, it is time to use that knowledge to choose the range of strategies that are most likely to bring about the sustainability goals you are aiming for. It is likely that sustainability systems will work on different approaches simultaneously; while developing better implementation models and voluntary standards, you could also set the scene for pre-competitive collaboration and regulatory reforms.

If given a choice, your preference should be to start by implementing value chain strategies because if the conditions are favourable, it is easier to influence practices within a value chain than to try to tackle system conditions. However, as discussed above, it is equally crucial to consider complementary approaches that are able to effect systems level change in order to achieve the transformative impacts we are seeking. For both value chain strategies and systemic strategies, you will also need to determine whether the conditions are favourable for collaborative approaches that may enable more scaled solutions.

The following figure provides a structured approach for determining the best strategies based on context.

![Decision-making framework](figure4.png)

Figure 4: A decision-making framework to understand how the context influences improvement strategies
### 3.2.1. Value chain strategies

Value chain approaches are likely to succeed when they have a favourable enterprise, market, and institutional context. The following table outlines strategic considerations for different configurations of enabling and disabling conditions.

<table>
<thead>
<tr>
<th>PRODUCER CONTEXT</th>
<th>MARKET CONTEXT</th>
<th>INSTITUTIONAL ENVIRONMENT</th>
<th>STRATEGIC CONSIDERATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>+</td>
<td>+</td>
<td>+</td>
<td>Good context to promote value chain strategies. Focus on collaborative ones if sustainability challenges and investment require pre-competitive action.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-</td>
<td>Favours value chain strategies. Strong undermining dynamics in the institutional context may need to be addressed through systemic strategies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>+</td>
<td>Value chain strategies can be pursued if supply chain actors have reach/leverage over producers. It may need emphasis on improvement standards (e.g. step-wise approaches), market incentives, and capacity building. The public sector can play a role in standard-setting and capacity building.</td>
</tr>
<tr>
<td>-</td>
<td>+</td>
<td>+</td>
<td>Role of public sector in supporting producers will be limited, making the role of value chain actors more important, as well as the market incentives they provide to producers. Collaborative strategies may support a level playing field and co-investment and risk-sharing.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-</td>
<td>Focus on the systemic pathway to support role of public sector to improve producer performance (e.g. through mandatory standards).</td>
</tr>
<tr>
<td>+</td>
<td></td>
<td>+</td>
<td>Work on producer-centric approaches. Engage with front-runner value chain actors to build proof of concepts of sustainability improvements which may inspire the public sector and other value chain actors to act.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-</td>
<td>Focus on strengthening the governance of the sector, and feed this with proof of concepts from producer and value chain best practice projects.</td>
</tr>
<tr>
<td>-</td>
<td></td>
<td>-</td>
<td>Lower ambitions to reach scale and start best practice pilots with producers and value chain actors and raise awareness on sustainability issues.</td>
</tr>
</tbody>
</table>

Table 4: Strategic considerations in response to producer, market, and institutional contexts

The next step is assessing if there is a need for collaborative value chain strategies. Collaborative strategies offer the potential of being more influential and scalable and of aligning stakeholders around common aims and actions. To assess whether collaborative strategies are feasible, the following four questions are proposed:
- Do the critical sustainability issues lend themselves to collaborative action?
- Do knowledge, capacity and investment needs require broader input or capacity?
- Are other stakeholders interested to collaborate, creating the opportunity for collaborative action?

<table>
<thead>
<tr>
<th>NEED FOR COLLABORATIVE ACTION</th>
<th>OPPORTUNITY FOR COLLABORATIVE ACTION</th>
<th>STRATEGIC CONSIDERATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>+ SUSTAINABILITY SCOPE</td>
<td>+</td>
<td>- Include community and landscape targets in scope of standards (i.e. beyond the producer unit) and link market incentives to these targets</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Support collaborative jurisdictional/ landscape management and community engagement processes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Pursue awareness raising and policy influencing on relevant sustainability issues</td>
</tr>
<tr>
<td>+ KNOWLEDGE, CAPACITY AND INVESTMENT NEED</td>
<td>+</td>
<td>- Improve the knowledge and investment base through multi-stakeholder collaboration</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Promote the service sector</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Advocate for public sector investment in research and service delivery</td>
</tr>
<tr>
<td>+ SUSTAINABILITY SCOPE AND/OR KNOWLEDGE, CAPACITY AND INVESTMENT NEED</td>
<td>-</td>
<td><strong>As above, but pay attention for:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Awareness raising, trust building through small pilots in which stakeholders learn to collaborate and can perceive mutual benefits</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Donor alignment to avoid competitive projects</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Partner with legitimate actors</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Strengthen capacities of CSOs and industry associations</td>
</tr>
</tbody>
</table>

Table 5: Assessing feasibility for collaborative value chain strategies

### 3.2.2. Systemic strategies

Contextual constraints are found in the areas of governance, trade, sector dialogue and coordination, as well as the socio-cultural and natural environment. For example, in a weak governance context, it is likely to be more challenging to influence public policies than in a stronger one. This does not necessarily mean that influencing policy is not an option but that doing so via multi-stakeholder platforms may be more effective. Similarly, there may be more potential to organize stakeholders around a sector dialogue in sectors where actors are fairly concentrated and there is a minimum level of mutual trust.

If your initial assessment is that value chain approaches are unlikely to be successful, then you need to assess whether you are able to influence broader system conditions, either individually or collaboratively. This can be assessed by answering the following three questions:

- Is there a business case for key public and private actors to promote sustainability?
- Do those actors have leverage over producing enterprises and value chain actors?
• Is there sufficient civic space to influence them?

<table>
<thead>
<tr>
<th>BUSINESS CASE</th>
<th>LEVERAGE</th>
<th>CIVIC SPACE</th>
<th>STRATEGIC CONSIDERATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>+</td>
<td>+</td>
<td>Good context to pursue systemic strategies targeting relevant actors (e.g. government, financial sector, value chain actors, consumers).</td>
</tr>
<tr>
<td></td>
<td>-</td>
<td>+</td>
<td>Raise awareness and sense of urgency through research and campaigns. Engage with leaders decision-makers to see what can be done to strengthen the business case.</td>
</tr>
<tr>
<td></td>
<td>+</td>
<td>-</td>
<td>This can limit potential effectiveness of systemic strategies with individual stakeholders. Pursue collaborative strategies to get different actors aligned and strengthen capacities of key public or private stakeholders to increase their leverage.</td>
</tr>
<tr>
<td></td>
<td>+</td>
<td>-</td>
<td>Potential effect of systemic strategies is large, but space to influence is limited. Partner with legitimate actors which have influence over decision-makers or consider to strengthen capacities of CSOs.</td>
</tr>
<tr>
<td></td>
<td>-</td>
<td>+</td>
<td>Reconsider the relevance of systemic strategies. Start best practice pilots with producers and value chain actors and start collaborative action (e.g. multi-stakeholder platforms) to raise awareness.</td>
</tr>
</tbody>
</table>

ANY COMBINATION OF 2 OR 3 DISABLING CONDITIONS

Enabling (positive)  Disabling (negative)

As with value chain strategies, you should consider whether systemic strategies can be better pursued individually or in collaboration with other stakeholders (or in combination). To assess whether collaborative systemic strategies are needed and whether they are potentially effective, the following questions should be answered:

• Do public or private policy changes require collaborative action?
• Is there a need for stakeholder alignment and coordination?
  Is the context favourable for collaborative action?
3.3. Determining your role

Once you have an understanding of whether value chain or systemic strategies are likely to be successful in a given context, you need to look at the range of strategies available to you and determine where you are well-placed to implement them, either individually or collectively, and what role you are best placed to play.

For a given strategy to work well, sustainability systems need to internalize the resources and capacity they possess and identify where they are best placed to create change. This also means looking at how you can work with other stakeholders who are in a position to influence the enabling conditions that will help you to achieve your goals.

Sustainability systems should consider some key elements when choosing the best pathway for strategy selection.

- What is my organizational capacity to deliver on the desired goals?
- What role has the potential to achieve the greatest value considering roles played by other stakeholders and initiatives?
- Which partnerships need to be developed to ensure complementary roles are taken up?

The following table gives some insights on when different intervention strategies are more relevant and what risks may exist.

<table>
<thead>
<tr>
<th>Need for Collaborative Action</th>
<th>Space for Collaborative Action</th>
<th>Strategic Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder Alignment</td>
<td>+</td>
<td>Promote multi-stakeholder dialogue for joint vision and strategy development and accountability mechanisms</td>
</tr>
<tr>
<td>Policy Influencing</td>
<td>+</td>
<td>Promote multi-stakeholder collaboration for lobby and advocacy</td>
</tr>
</tbody>
</table>
| Stakeholder Alignment and/or Policy Influencing | - | As above, but pay attention for:  
  - Awareness raising, trust building through small pilots in which stakeholders learn to collaborate and can perceive mutual benefits  
  - Donor alignment to avoid competitive projects  
  - Partner with legitimate actors  
  - Strengthen capacities of CSOs and industry associations |

Table 7: Assessing feasibility for collaborative systemic strategies
<table>
<thead>
<tr>
<th>Role</th>
<th>When relevant?</th>
<th>Potential risks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Critical outsider:</strong></td>
<td>awareness raising through public campaigns and advocacy</td>
<td>May undermine the more partnership-oriented approaches</td>
</tr>
<tr>
<td></td>
<td>• When awareness on issues among key target groups is low or potential solutions are ignored</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When actors do not make enough progress on their commitments</td>
<td></td>
</tr>
<tr>
<td><strong>Dialogue partner / convener:</strong></td>
<td>participation in and/or convening platforms, commissions, etc.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When there is a willingness to engage in collaborative processes or a need for alignment, coordination and common standards and tools</td>
<td></td>
</tr>
<tr>
<td><strong>Expert:</strong></td>
<td>conducting research, developing tools, providing technical and strategic advice, capacity building</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When there is a need for capacity building</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When there is a need for specific expertise that others cannot offer</td>
<td></td>
</tr>
<tr>
<td><strong>Funder:</strong></td>
<td>Funding activities of other actors</td>
<td>May risk future continuity after funding ends</td>
</tr>
<tr>
<td></td>
<td>• When this allows to solve a critical bottleneck or to develop a proof of concept</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When it can overcome a temporary funding gap (e.g. initial investment)</td>
<td></td>
</tr>
<tr>
<td><strong>Strategic partner:</strong></td>
<td>partnerships with joined targets, sharing of responsibilities, knowledge, resources and brands</td>
<td>Possible conflicts/reputational risks if interests diverge</td>
</tr>
<tr>
<td></td>
<td>• When there are similar goals and complementary roles</td>
<td></td>
</tr>
<tr>
<td><strong>Implementer:</strong></td>
<td>taking ownership of implementation of pilot projects or field implementation programs</td>
<td>May undermine ownership by key target groups</td>
</tr>
<tr>
<td></td>
<td>• When this allows to solve a critical bottleneck, and to develop a proof of concept</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When this can increase the credibility for other roles (e.g. expert and strategic partner)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• When it can support the fund-raising for other roles</td>
<td></td>
</tr>
</tbody>
</table>

Table 8: Considerations for determining your role

### 3.4. Mapping systems change

Once you have a good sense of the context and which stakeholders are in the best position to effect positive change, you should develop a model of how you think the desired change is most likely to come about. This is your theory of change and it is important for being able to assess whether and how well your strategies are working or not and why. Your theory of change is about who or what needs to change to reach your intended goals and how your strategies will help to bring that about.

At minimum, a sustainability system should map out the causal chains (causes and effects of different actions) that show how your strategies are intended to drive change. For value chain strategies, this may be fairly straightforward as the intended effects are often directly tied to the actions, e.g. if your goal is improved enterprise income, the causal chain may be that training of certified enterprises increases their knowledge and skills which should lead them to be more productive, which should improve their income.
For systemic strategies and impacts, the causal chains may be much more complicated as there are lots of other factors that can influence the success of that strategy. However, mapping causal chains for systemic strategies is also more important as it helps to make clear where there are dependencies and bottlenecks in the system and what assumptions you are making about how various actions influence the ultimate outcomes. This will be particularly important when you look at measuring the effectiveness of your strategies and seek to understand why or to what extent different strategies have been successful in contributing to the enabling environment and, ultimately, to the uptake of improved practices by target enterprises.

3.4.1. Steps for building out a theory of change or causal map

The basic steps to building out a theory of change include:

1. **Identify long-term goals**

   This is about developing a picture of what sustainability performance looks like when the goals you set have been achieved. Following the steps in this guide, the long-term goals will have been set at the outset of the process to choose your strategies.

2. **Backwards mapping and connecting outcomes**

   Starting with the long-term goal, define all the significant outcomes that need to be in place to achieve that goal. Then, for each of those outcomes, do the same exercise of determining what needs to be in place to

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achieve the outcome. Work backwards until you have a map of all the actions needed and the results you think will be achieved at each stage.

3. Complete the outcomes framework

Draw connections between all interconnected actions, outputs, and outcomes, resulting in a cohesive map that clearly shows how the range of actions are likely to contribute to the desired outcomes and end goals.

4. Identify assumptions

Your map of connected outcomes is based on a set of assumptions about how change happens, e.g. in delivering training, the assumption is that this will lead to increased productivity. The assumptions that underlie a theory of change should be made explicit as they are the logic against which to evaluate why the long-term outcomes were achieved or not.

5. Develop indicators

For the purposes of understanding what is working or not and why, this is the most important stage. This stage focuses on how to measure the implementation and effectiveness of the initiative. By collecting data on each outcome, the initiative can identify what is or isn’t happening and then look to the assumptions to determine if they hold true. (see next section)

6. Revisit strategy choices

The theory of change will show the full range of actions that are needed to bring about the desired goals. It will be an important exercise to look at how your strategies map across these actions to assess both whether these are the most effective roles you can play and whether there are any significant gaps that will prevent the strategies or related actions from being successful. It will also help you to identify other external factors which may influence the outcomes of your strategies on the enabling environment.

3.4.2. Putting it all together

Practically speaking, most sustainability systems will already be implementing a variety of value chain and systemic strategies that ideally work together to contribute to improved performance; this is not a blank slate. However, by working through the above steps, it will be easier for sustainability systems to be more intentional and tailored in your choice of strategies for a given context and where you can play a more effective role in driving sustainability improvements.

In choosing strategies, most sustainability systems will identify a leading or primary pathway through which you intend to effect change, and a set of secondary or supplementary pathways that complement your primary intervention. The following example shows how a fictional sustainability system operating in aquaculture combines strategies to effect change in the Vietnamese shrimp industry.
4. Measuring Change

One of the most significant challenges in implementing improvement strategies is that we know comparatively little about how well they are working or not. In practice, many of these strategies have been good at incentivising enterprises to start down the path to sustainability, but it is unclear whether that improvement is temporary or more durable and whether it is a single step or the first step in a longer journey. That is why it is so important to understand what is working or not and why – so that we can learn, adapt, and improve our strategies to be more effective over time.

When we think practically about how to measure improvement, there are two different types of measurement required:

- **Sustainability performance**: how has sustainability performance changed over time – are the critical sustainability issues that have been prioritised getting better or worse? This is the performance outcome information that stakeholders are most interested in.

- **Assessing outcomes and assumptions**: it is also important to gather information and insight about why performance is improving or not. This is where your theory of change comes in and requires you to gather information about whether different results in your outcomes map have been achieved or not.
Putting together the performance measures and the assessment of intermediate outcomes will help you to understand whether your change logic holds and where any adaptations are required either in the way you think change comes about or in the strategies you are using to bring about that change. For example, if you are aiming to improve worker health and safety but performance measures show that progress is not being achieved as quickly as you expected, then assessing changes in the range of factors influencing health and safety could help to identify the causes of this slow progress, e.g. that there is little regulatory enforcement of statutory health and safety requirements. This could, in turn, cause you to adapt your strategies to focus more on influencing this system condition.

The following sections focus on how to choose metrics and commensurate data sources and how to conduct analyses in ways that support the integrity and accuracy of how we measure improvement.

4.1. Performance metrics

There are a series of complex choices to be made in settling on performance metrics against which to measure progress. The first choice concerns the definition of the issue. This can build on the background work for problem definition (1.1) but is more specific. For most sustainability issues, there are multiple working definitions or theoretical constructs that have spawned a range of organisational targets and commitments, each with their supporting metrics. For example, biodiversity is often defined on three levels:

- genetic diversity – the range of genes and characteristics within a species;
- species diversity – the variety of organisms within a habitat or area; and
- ecosystem diversity – the diversity of species between different habitats or areas.

Not only do you need to decide what type of diversity you are measuring, more specificity is required within each. For example, within species diversity, a choice needs to be made whether to measure total number of species, presence of indicator species, habitat diversity, or some other proxy. Sustainability systems should be explicit about your choice of definition for each performance issue and the implications this has for what you will measure.

Other factors informing the choice of metrics include:

- cost of data collection, analysis, management and communication;
- extent to which the metric is representative of the outcome;
• the degree to which it reflects different contexts and changes over time;
• how well the metric enables communication of progress against your defined goals; and
• what information your target audiences are most interested in.

The elusive goal in your choice of metrics is to be able to get high quality information that is responsive to change over time and context and which is able to reflect the outcomes of management practices. The challenge is that this inevitably requires significant effort to collect, analyse, manage and report.

Metrics that measure inputs and outputs are generally cheaper to collect, e.g. through the audit process, but typically do not allow clear statements about environmental and social change. Metrics that are based on secondary data and modelling, often requiring less investment to record and implement, tend to be insufficiently granular to reflect the individual performance of certified enterprises. Ultimately this is about finding the sweet spot between representativeness and feasibility.

Appropriate metrics for assessing performance improvements should2:

• measure the status or trends in a specific sustainability outcome;
• measure specific elements of defined goals and targets;
• reflect broadly held definitions of the related sustainability issue;
• be standardised and applied consistently to facilitate comparability of findings over time;
• be sensitive enough to detect relevant changes from a baseline state;
• be consistent with SMART guidelines (i.e., specific, measurable, attainable, relevant, and time-bound) so that they can be objectively measured;
• be cost efficient and simple enough that they do not require a high level of technical expertise to assess; and
• be defined in quantitative terms but supplemented by qualitative information when appropriate (e.g. for social issues like land conflict or forced labour).

Once you have identified a range of possible metrics for an issue, a useful exercise to narrow your pool is to evaluate each metric against a set of criteria based on the above list to get a more quantifiable picture of which metrics are the best fit. Each metric should be assessed for low, medium or high fulfilment of the following criteria3:

• **Considerations around sustainability definition**
  - Measures the sustainability issue
  - Underpinned by evidence
  - Addresses material impacts

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2 Adapted from [AFi Operational Guidance on Monitoring and Verification](#)

3 See [3Keel Performance Metrics for Key Sustainability Issues](#), p31
Widely used and easily communicable

- **Considerations around performance monitoring**
  - Practical to collect
  - Context-sensitive
  - Responsive to change
  - Scalable and measurable at the appropriate scale

- **Considerations around data use and quality**
  - Baseline data available to provide context
  - Measurement tools available that improve data consistency
  - User data collection guidance exists to improve data quality

The following diagram shows how this kind of evaluation exercise might work for a range of potential metrics:

![Assessment table for evaluating metrics](image)

4.2. **Systems change metrics**

Whenever you are making assumptions (e.g. in your theory of change) about how performance improvements are likely to come about, it is useful to assess whether the system changes required for that performance improvement actually happen. Ultimately, we want to know if the conditions for uptake of more sustainable practices are improved. Improved system conditions are more likely to result in long-lasting sustainability performance improvement.

Understanding whether your systemic strategies are being effective is primarily about measuring whether the intended outcomes are being achieved. We are seeking to measure changes in the enabling context. The types of changes that result from these strategies include capacity and behavioural change, shift in social norms, institutional change, and policy commitments. Much like performance improvements, these changes can take time to appear but are generally less visible than performance change, making them more challenging to monitor. However, practically, the process of defining metrics is quite similar – for each of the outcomes in your theory of change, identify one or more indicators that will show the extent to which the desired outcome has been achieved.
One approach is to identify indicators that characterize the quality of the enabling environment. This could be a combination of quantitative and qualitative indicators. To create a quantitative feel for qualitative indicators, scorecards could be developed with different levels of performance:

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Level 1</th>
<th>Level 2</th>
<th>Level 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>e.g. Presence of regulatory incentives for sustainability</td>
<td>No or perverse incentives</td>
<td>Some incentives, weak effect</td>
<td>Incentives drive sustainability performance</td>
</tr>
<tr>
<td>Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Regulations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Policy evaluations</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 9: Quantifying qualitative metrics

Once you have a sense of the extent to which each of the various intermediate outcomes have been achieved, identify those where no change or negative change has happened. It is likely that there are other forces at play that have influenced the actors or conditions. Review your assumptions of how you thought change would come about and, to the extent possible, try to identify what other factors might have influenced the outcome that you had not yet considered. This insight about other factors can be fed back into your strategy evaluation process so that you can determine whether your initiative or your partners are in a position to adapt your strategies to address the new contextual factors.

Learning feedback loops require that sustainability systems actively integrate the insights coming out of the data analysis into your decisions about what strategies are being implemented where, and what roles your initiative and your peers are playing. The analysis should also be used to update your theory of change about how different actions are more or less likely to contribute to the desired outcomes and, ultimately, to your performance goals.

4.3. Data sources

As you are identifying a set of metrics, you will come up against the question of whether there are appropriate data sources available to measure performance. Collecting good data is challenging without good data sources. Remember that there may be a lot of useful datasets already available. A data source is often an existing set of data collected by a secondary entity like a regional or national government or an academic institution. The accessibility of these data sources needs to be weighed against the quality, relevance, local availability, and timeliness of the data. An available data source that doesn’t give up-to-date insights on the metrics that are being measured is not of much value.

Data sources for monitoring should be appropriate to the commodity, geography, and production context, and to the nature of the issues being assessed. This may require collection of primary data in some cases where relevant secondary data sources do not exist. The following table provides guidance on factors that should be taken into account when choosing which data sources to work with:

<table>
<thead>
<tr>
<th>Factor</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevance</td>
<td>First and foremost, data must be relevant to the issues, targets and metrics that have been defined by the initiative. Ideally the initiative is only collecting data that is most helpful in assessing performance.</td>
</tr>
</tbody>
</table>
This is indicative of how well the data represents reality. Reliability of the data is based on whether it comes from a reputable and unbiased source that is resourced to collect the data, how complete the data set is, and the quality of that data. Accuracy can be strengthened by triangulating or cross-referencing two of more overlapping data sets.

The appropriate resolution for a data source depends on a number of factors including how well it matches up with the intended end use and the resolution at which the related sustainability issue is meaningfully measured (e.g. water stress or availability can be measured across a jurisdiction while incidences of child labour require data collected at a site level or community scale).

The data source includes up-to-date data. The frequency of updating is sufficient that the data’s relevance is maintained over time. The appropriate frequency will vary depending on the nature of the issue and the metric, with data being updated anywhere from close to real time to once every few years. Having historical data also provides insight into the consistency of the data over time.

This is often the most significant trade-off as data sources that are free and easily accessible may not be reliable or relevant enough to be of value. The alternative is to invest in primary collection of relevant data. However, where the costs of primary data collection would be significant, available data that is of limited value is sometimes better than no data. In these cases, the limitations on the relevance and reliability of the data need to be made explicit.

Table 10: Factors informing the choice of data sources

When you are considering adopting an external data source, use this set of questions to evaluate how suitable the data source is for your intended purpose:

- Is the data openly available, or does it require special permission to access?
- Is the data structured in a way that is useful for your programme? Are definitions similar? Can your system handle all the data types of the new source, such as spatial data files?
- How often is the data collected?
- How granular or detailed is the data geographically and demographically?
- When was the data collected? How long has it been retained?
- Do the current problem solvers use it for decision-making, evaluation, or something else?
- Who collected the data? What was the purpose of their data collection? Has the data been cleaned and/or analysed? And if so, in what way?

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4 modified from AKVO Understand your data and extract the insights that matter
One strategy for answering some of these questions is to look at any metadata that comes with a data set. The metadata can reveal who collected the data and when, for what purpose, data quality issues, etc. It may also list any license conditions for using the data.

**Box 1: Comparability of data**

While the first priority for any sustainability system is to identify metrics and data sources that are relevant for your context and use cases, it is useful to give some consideration to comparability of the resulting information. The potential for comparability between data will be strengthened if you are able to align on the following factors:

- the applicable scales of the data used (from site level to global),
- the timeframes of data desired and of the data subsequently used in an assessment (from the last 12 months to several years),
- the sources of data (from the enterprise to a diverse array of external sources), and
- the data collection methods (from direct contacts and data requests to a variety of active and passive methods).

### 4.4. Data management

For consistency and quality purposes, sustainability systems should have a data management methodology in place. The monitoring methodology applies in particular to primary data collection but is relevant also for interrogating the quality of secondary data sources. The monitoring methodology should include information about the following elements:

- The frequency and intensity of data collection required for each metric, including sampling;
- The required formats for the data that is collected and how this data should be recorded;
- Roles and responsibilities for who collects the data and who analyses it;
- Knowledge and skills required of the data collectors and analysts (and any evaluation of this competence);
- If and when stakeholder views should be considered and whether data is validated by local stakeholders;
- Any special considerations for the collection and recording of baseline data;
- Any differences in approach between managing primary and secondary data collection.

For each sustainability issue, data collection should take place at intervals that are sufficient to assess progress against a baseline, targets, and goals, while also being frequent enough to capture any negative changes in performance. The frequency and intensity of monitoring or data collection for any given issue is dependent on a few related factors:

- the significance or materiality of the sustainability issue;
- the rate of change in performance for that issue;
- the scale at which data collection is feasible (and commensurate costs); and
- the nature of the data sources available (including how frequently the data is updated).

Ideally, the frequency with which data sources are updated matches the frequency that performance needs to be monitored. Where this is not the case, primary data collection or identification of additional secondary data sources might be needed to supplement existing data sets.

4.5. Data analysis and insights

Now that you have data sets that are relevant and have been vetted, it is time to start your analysis and try to make sense of all this data. There are numerous ways to make sense out of data. The method you choose will depend on the questions you posed and on the type of insights your intended audiences are asking for.

Most types of data analyses have significant human input to get to decisions and to action. Analysing and presenting the data is unlikely in itself to be sufficient to change the actions of stakeholders and decision-makers. Some of the steps you can take to strengthen the acceptance of the analytical conclusions include engaging future users and decision-makers of your outputs early on in the problem definition phase and throughout the process, building data literacy (e.g. to use the data analysis tools and to understand the results), making sure the analytical outputs and visuals are tailored to their needs, and recognizing that this is an iterative process that can and should improve over time.

When these questions are more about explaining what and why things have happened, descriptive and diagnostic analytics will come in handy. If the questions relate more to what could possibly happen in the future, predictive and prescriptive analytics are more appropriate. In the case of performance measurement, you are most likely to be focusing on descriptive analyses like measuring what happened. For assessing intermediate outcomes and assumptions, the focus will be primarily on diagnostic analyses to understand why something happened. The following diagram shows the relationships between different types of analyses.  

![Figure 9: Data analysis types for data-driven decision-making](image)

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5 From AKVO [Understand your data and extract the insights that matter](https://akvo.org/understand-your-data-and-extract-the-insights-that-matter)
5. Claims and Communications

Measuring performance improvements and changes in the enabling context is valuable for two purposes. The first, as noted in section 4.2, is the use of this information to inform improvements in your strategies for bringing about more durable and scaled performance improvements. Equally important though is to be able to communicate about the progress that has been made. Improvement claims are largely about communicating changes in performance and the actions taken to contribute to those performance improvements.

5.1. Performance claims

For performance improvement claims, there are a number of different ways in which sustainability systems can report performance and progress against sustainability outcomes. These have been categorised broadly here into three types: status, trend, and subjective value claims.

- **Status claims**: these claims communicate the current performance level of an issue, e.g. we have achieved net-zero deforestation in this jurisdiction.
  
  › Status claims are the most objective because they are stating actual data. They describe the current performance status of a sustainability issue, e.g. ‘In this district in 2019, only 3% of residents were living in extreme poverty.’
  
  › These claims are strengthened if additional context is provided to improve stakeholders’ ability to interpret them, e.g. ‘This compares to 17% for the state overall and 12% for the country overall’.
  
  › Where baseline data already measures a positive level of performance for one or more issues, e.g. that there is no child labour present in this village, this can also be the subject of status claims.
  
  › A caveat of both status and trend claims is that neither provide an indication of whether the performance levels are due to the specific actions taken or to external factors.

- **Trend claims**: these communicate a change in performance, often against a baseline or as progress towards a target, e.g. we have reduced jurisdiction-wide deforestation by 15% since 2015.
  
  › Trend claims are about the change in performance that has accrued over time. These claims require a reference level to be in place or can function in relation to a performance target. Trend claims can be positive, negative or neutral, e.g. sometimes no change is a significant result worth communicating.
  
  › Trend claims are also more robust when they include a timeframe under which the change has taken place, e.g. ‘the rate of deforestation in the jurisdiction has been reduced by 5% in the last year’ (baseline reference), or ‘we are 50% of the way towards meeting our 2025 target of zero net deforestation in the jurisdiction’ (performance target).
  
  › Claims of performance improvements cannot be made after baseline research; change will become evident only after subsequent data collection has been conducted.
  
  › Similar to status claims, trend claims are improved with the addition of contextual information. For example, is the 5% reduction in the example above an improvement over the previous year?

- **Subjective value claims**: these are descriptive claims that seek to reflect performance across a range of sustainability issues or indicators.
The most common examples of subjective value claims are jurisdictional initiatives that claim to be ‘responsible’ or ‘sustainable’. Similar examples with a conservation focus include ‘forest-friendly’ or ‘forest-positive’ place-based claims.

These claims reflect progress towards or achievement of various ‘values and priorities’, rather than a single performance target. They are subjective because use of the terms is premised on fulfilling requirements agreed by stakeholders within and outside the jurisdiction rather than as a result of meeting a specific performance level. Tools and frameworks such as LTKL’s regional competitiveness framework and LandScale are intended to facilitate these processes.

The ‘progress framework’ developed and implemented by a jurisdictional initiative (see section 3.1) may or may not be ambitious or comprehensive enough to enable the use of various subjective value claims, e.g. a claim could not be used if the local progress framework omits action on a critical sustainability issue.

While these types of subjective claims can be applied at a jurisdictional scale, this does not mean that they are automatically transferable to all commodities or products sourced from that jurisdiction.

5.2. Action claims

When sustainability systems want to make claims or communicate about changes in the enabling environment, this is often in relation to the actions they have taken. A common objective is to be able to link the actions with the improvements in performance.

Making claims in isolation about activities undertaken or strategies implemented is fairly straightforward. These claims are largely about communicating the work that an organisation or initiative has carried out (i.e. contribution claims). The situation gets trickier when links are made between the actions taken or the process implemented and the performance levels or improvement that has been achieved (i.e. attribution claims), e.g. we trained 1,000 farmers in this region last year and average farmer productivity in the region increased by 10% over the same period. Sustainability systems should align with the following guidance for contribution claims and for attribution claims.

**Contribution:** these claims are about actions taken in line with a theory of change to contribute to achievement of the defined sustainability outcomes

- Contribution claims should ideally be made about actions that have already taken place but, where the actions are ongoing, sustainability systems can make claims that include the current status of the action.

- Contribution claims need to be put in context, including a sense of the relative scale and intensity of the contribution⁶:

  - The nature of the actions should be described clearly, specifically, and truthfully.

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⁶ Adapted from [AFI Operational Guidance on Reporting, Disclosure and Claims](#)
The extent of the actions should be specified, typically in quantitative terms, and should be contextualized so that their scale and scope can be interpreted properly.

The timeframe for implementing the actions should be defined and documented, along with progress being made in implementation. Where the actions are ongoing, the sustainability system should publish information at least once a year that summarises this progress.

If the action entails a contribution to a broader effort, then the extent and nature of the sustainability system’s specific contribution should be specified, e.g. were they fully or partially responsible for this action, an anchor partner or supporting partner, delivering the action or supporting others to do so?

**Attribution:** these claims make the link that actions taken resulted in or contributed to specific sustainability performance improvements

- Claims of attribution link supporting actions to monitoring of sustainability performance (see previous section). Attribution requires that a sustainability system can show a causal link between their supporting action and a change in performance.

- In theory, this causal link can be assessed through impact studies with counterfactuals or a control group to show what would have happened in a similar situation with no intervention, or at least through a rigorous output to outcome analysis. However, in practice, this is inherently complicated in contexts where many actions are being taken by many different stakeholders. If a sustainability system does seek to make an attribution claim, you should do so for a specific and limited group or area that you have supported directly. Even in these cases, attribution claims will require that a credible research approach is followed to establish the causal links.

### 5.3. Strengthening the Integrity of the Claim

The integrity of a sustainability performance claim or communication is strengthened if there is a credible body of evidence to support it. The practices that you put in place, from your improvement strategies to your monitoring methodology, will serve as the foundations on which to make credible claims. Among the key factors contributing to the integrity of a sustainability claim is the supporting evidence that is made available, and the extent to which users or audiences can trust in the results.

**Supporting Evidence**

Additional information helps to support the rigour of a performance claim or communication. Your claim will be strengthened if you specify:

- The evidence base (research results) behind the claim.
- The context to which the claim applies, e.g. is it applicable globally or only in relation to a particular country or even region?
- Whose results you are referring to (i.e. what intervention) and about whom (i.e. the entity whose performance has improved).
- Over what period the results were achieved and for how long the results hold (e.g. the time limit on claims).

Additional information that can be made available on request to support the integrity of the claim can include:
• The time period when the source data was collected;
• Clarity on who collected and analysed the data (internal staff or external researchers) and the research methods used;
• Contact details of any independent party involved in carrying out the research;
• A description of the methods used and any assumptions made, especially if the claim involves a comparison with other products or services or directly attributes change to the sustainability standard;
• Consent to name organisations or individuals (if this is needed for claim) or clear rules and procedures for anonymization.

Contextualising claims

The assumptions and caveats related to any claim should be clear. How well a strategy or intervention works may vary by context and be affected by many external factors. Outcomes achieved in one place may not be the same as outcomes that result in another place. It is always important to be clear about the geographical, market, social, economic or environmental context behind reported results and claims.

Confidential information

As scrutiny of performance improvement claims increases, it is becoming increasingly important to make sure that you are prepared to provide all information to substantiate a claim if challenged. If some of the information needed to substantiate a claim is confidential, sustainability systems should consider whether there would be adequate evidence to verify the claim if that confidential information were excluded or made anonymous.