

# ISEAL Credibility Principles V1.2 consultation comment log

This document contains a log of the feedback received on the second draft of the Credibility Principles (V1.2) during the consultation period from November to December 2020, as well as how the ISEAL secretariat responded. We would like to thank all the respondents who took time to share feedback in this round of consultation. We believe that your input and suggestions have made the principles clearer and stronger. If you would like to discuss any of your inputs and how these were taken into account, please contact [consultation@isealalliance.org](mailto:consultation@isealalliance.org).

Comment number	Stakeholder group	Principle	Type of comment	Comment and suggestions for improvement	Observations of the secretariat
2	Standards and standards-like	1. Sustainability impacts	General feedback	"and eliminating or remediating negative impacts" Support this addition – fits far better here than in 'Measurable progress'	Thank you!
13	NGOs	1. Sustainability impacts	General feedback	1. Free Prior and Informed Consent, 2. Feedback Mechanism or Grievance Redress Mechanism	For the question of feedback and grievance mechanisms, please see the related content in Stakeholder engagement. For the question of FPIC, certainly FPIC is an important human right. At the same time, the Credibility Principles aren't intended to define the sustainability objectives for individual sustainability systems and so they do not define areas of content for individual schemes (such as specific human rights, etc.). However, ISEAL does have other resources about how standards and similar systems can better support and integrate FPIC and we would encourage you to review these and share any reflections or feedback. ( <a href="https://www.isealalliance.org/get-involved/resources/fpic-resource-collection">https://www.isealalliance.org/get-involved/resources/fpic-resource-collection</a> )
23	Consultants & researchers	1. Sustainability impacts	General feedback	Put materiality first as the most important concept in this definition.	Materiality remains underscored in the statement that explains why the principle is important. However, the principles have also been reformatted as there were perceptions of

					hierarchy in the sentence order that was not intended.
46	Standards and standards-like	1. Sustainability impacts	General feedback	In the first part is says "driving sustainability impacts and eliminating or remediating negative impacts" - could that be and/or? Might there be occasions where there are innate negative impacts associated with the user's product/process that can't be eliminated or remediated and/or are outside the scope of the system? In the 2nd part I was not 100% clear on the "scope of responsibility" - is that the same as just "scope" mentioned in the next part?	<p>For the first point, this is an important question and this was discussed extensively by the Steering Group through the course of the process. Previous feedback supported the introduction of the direct reference to positive impacts and we see this as an important improvement to the revised principles. And while a system could theoretically define its scope, objectives and strategies such that it has no responsibility for eliminating or remediating negative impacts, this would fall below the threshold of the current version of the Impacts Code (which ensures that systems account for the possibility of unintended negative impacts resulting from their own interventions) and we would not want to lower expectations on this point. Previous stakeholder input indicates that the detection and remediation of negative impacts by sustainability systems remains a critical area for improved performance.</p> <p>And then, because the principles aim to provide the foundations for sustainability systems to deliver greater impact, we do not consider that a focus exclusively on eliminating or remediating negative impacts would be sufficient to meet the threshold of "sustainability impacts". (Of course, such a system would still be welcome to use the principles to guide their work in other ways.) As a result, we are giving weight to both aspects (rather than offering this as an "and/or").</p> <p>For the second point, thank you, we have simplified this now to just reference "scope" in order to avoid this potential for confusion.</p>

61	Companies	1. Sustainability impacts	General feedback	The why it matters is up for interpretation, who is to say where it matters?	This is essentially a reference to materiality. It is connected to the further statement embedded in the principle: "The organisation's system focuses on the most significant or material sustainability impacts and outcomes in its scope..." Certainly, there can be subjectivity to any assessment of materiality, but this is why the principle also focuses on clearly communicating the choices that have been made (e.g., "It defines and clearly communicates its scope, its specific sustainability objectives, and its strategies for achieving these objectives.")
63	Standards and standards-like	1. Sustainability impacts	General feedback	"The organisation's system focuses on the most significant or material sustainability impacts and outcomes in its scope;" I do not feel this is always true. For example, we have resource utilization in process (e.g. water, electricity) which may have a higher impact than the dye they choose to use, but we have more focus on the chemical choice rather than forcing them to be more efficient on resources. So it is in scope, but may not be the highest significant sustainability concern. Social issues are similar but no one can discern whether environmental or social is more important.	Yes, we can agree that there can be a subjective aspect to this, but this is why the principle also focuses on clearly communicating the choices that have been made (e.g., "It defines and clearly communicates its scope, its specific sustainability objectives, and its strategies for achieving these objectives.")
78	Companies	1. Sustainability impacts	General feedback	Suggest adding measurement of impacts, it is currently not clear if this matters for this principle	See measurable progress for this focus.
90	Producer groups	1. Sustainability impacts	General feedback	Like the Why is it important	Thank you!

93	NGOs	1. Sustainability impacts	General feedback	In the first consultation we submitted the following comment: “While we understand the need for international criteria to be “adapted to local or sectoral conditions where this is necessary to improve its potential impact”; from our experience, in practice, such adaptations have enabled and resulted in a weakening of standard criteria.” We welcome the amendment removal of “potential”, however, our concern remains that adaptations to local conditions can result in watered down standards. We recommend including further language such as “...can improve its impact without compromising scientific rigour”.	Thank you for noting the amendment. The further specificity requested isn't always applicable (e.g., consider systems that are focused on social as well as environmental aspects of sustainability) and approaches a level of detail that belongs in the Codes of Good Practice rather than in the principles.
105	NGOs	1. Sustainability impacts	General feedback	The organisation defines and communicates... It should be «defines and executes»	There are aspects of implementing a theory of change that can be found across all the principles. Execution is not reserved only for this principle.
114	Companies	1. Sustainability impacts	General feedback	The principle should include the validation of tools that support the strategy and that enable the measuring and the making of parameters to calculate the effect of changes, adjustments and modifications of the aforementioned sustainability components. If the standard implementing organisation did not have that tool, ISEAL could provide it in order to support the credibility and/or efficacy of the standard implemented. The tool could be a standard model applicable across the whole organisation or one that can be used as an example for the development of the organisation’s own tool.	See measurable progress for this focus. While ISEAL does not develop M&E systems for standards or other tools, we do provide guidance that supports systems to do this themselves. See for instance, the Impacts Code.

123	Standards and standards-like	1. Sustainability impacts	General feedback	I think that a Sustainability Impact principle is too broad, and in its description they talk about being clear on what the impacts are (positive and negative) in order to boost the positive ones and minimise the negative ones. They also talk about communication of responsibility of its objectives and strategy, of sustainability, as well as results and scientific evidence and relevant norms (what are these?) and of adapting to local conditions or conditions in a particular sector to improve their impact. I think that there are too many elements to consider this a principle. A principle should be clear and simple; not a starting point for multiple actions. I suggest this principle is simplified by bringing the organisations to the identification, assessment, monitoring and remediation of their impact. The second paragraph should become a clear and transparent communication principle.	It is true that this principle includes quite a few aspects of what it means to design a system with a clear focus on impacts. We have tried in the next version to simplify the language so that the connections are clearer. Monitoring and evaluation though are still treated in Measurable progress and Continual improvement. And while we could have deleted the reference to clear communications and relied on the Transparency principle to convey this, it felt important to retain this so as to emphasise the responsibility of the system to be explicit about the choices that have been made (about scope, strategies, etc.). To answer the question about what would be a relevant international norm, this would include, for instance, international conventions such as ILO conventions.
124	Standards and standards-like	1. Sustainability impacts	General feedback	I would make the following edits: "The organisation has a clear sustainability purpose that is focused on driving positive sustainability impacts and eliminating or remediating negative impacts. The organisation's system focuses on the most significant or material sustainability impacts and outcomes in its scope, and it is adapted to local or sectoral conditions where this can improve its impact."	Please see the response to comment 123.
24	Consultants & researchers	2. Accuracy	General feedback	What does this principle mean?	The principle has been renamed Reliability and reworded in order to provide greater clarity.

39	Accreditation bodies/CBs	2. Accuracy	General feedback	Instead of "Accuracy" I think that this section relates or should relate to "Impact".	We have renamed the principle Reliability to better reflect the content of the principle.
94	NGOs	2. Accuracy	General feedback	Trust also relies on these assessments being monitored for competency and accuracy (i.e., oversight) and that these assessments are freely available for stakeholders (i.e., transparency).	Yes, agreed. The choice of the word "ensures" is meant to signal oversight. We have amended transparency to talk about stakeholders being able to understand and evaluate the system's processes, decision-making, results, and impacts. This should now be more comprehensive of the kinds of information stakeholders might need in order to engage. For specific requirements, please see the Assurance Code
106	NGOs	2. Accuracy	General feedback	It's not clear who carries out the assessment, whether they are external or internal users. It sounds as if the assessments are carried out to validate (support) what the company has announced or sent out. The wording must be reviewed.	One of the main aims of the revision has been to update the principles so they can apply to a wide range of systems. This wider range of systems could be using various approaches to assessment, including but not limited to third party certification (for instance, the definition of system is quite wide and speaks about measuring, monitoring or verifying performance). This is why this principle makes an explicit link to claims and therefore the Truthfulness principle. It is also important to note that Impartiality remains a stand alone principle.
115	Companies	2. Accuracy	General feedback	The competence of the tools has a different value or level according to the person who is assessing it, their ability, expertise and experience in playing an influential role on the final assessment of whether the tool is competent or not. There must be criteria that can measure the effectiveness or competence of the tools or a standard model developed by ISEAL that allows parameterizing the point of view of the person who is assessing the credibility of the implemented standard.	The Standard-Setting Code does define some important quality parameters (see particularly clause 6.3). And the Assurance Code (particularly clause 5.5) addresses the competence of the person assessing implementation, but the potential need for further guidance in this area (especially with the broader scope for the principles) is indeed noted.

3	Standards and standards-like	2. Accuracy	General feedback	Noting that our previous comment on this has not been incorporated (that there is a difference between rigour/accuracy vs consistency/precision)	Yes, we focused on further clarification rather than splitting the principle into two further principles. The principle has also now been renamed and hopefully this makes the principle more connected / coherent in your view.
14	NGOs	3. Measurable progress	General feedback	Participatory monitoring	Specific requirements or guidance about different methodologies or approaches to M&E belong more at the level of the Codes or guidance materials. At the same time, please do refer to Stakeholder engagement for related content within the principles.
47	Standards and standards-like	3. Measurable progress	General feedback	Do there need to be performance levels or improvement pathways for the users? Wouldn't participation result in progress towards sustainability objectives? Also as noted in definitions - "verifiable" might benefit from definition	Agreed that the wording was confusing. Version 2 attempts to use clearer language and avoids repeating definitions.
64	Standards and standards-like	3. Measurable progress	General feedback	"The organisation collects reliable and verifiable data" maybe should say "...reliable, verifiable data..." It seems some "analysis" is missing from the second paragraph. Data collection itself is not demonstrating progress.	Reworded to focus more on quality outcomes (rather than quality data as an input). The necessary reference to analysis has also been integrated.
79	Companies	3. Measurable progress	General feedback	Reference to "organisation's sustainability objectives" not clear. An organisation might have different tools with different sustainability objectives. It also seems that the producer is not involved in setting sustainability objectives, whereas for some standards they can also set priorities.	The principle has been reworded and hopefully this clarifies. While it is certainly true that users of the tools will also have their own sustainability objectives, in this context, what we are talking about is the scope of responsibility of the system and so the sustainability objectives are those referenced in Sustainability impacts. Essentially, the system is responsible for monitoring the effectiveness of its tool(s) in achieving results. This would not preclude users from having their own objectives (and monitoring these) and it would not exclude the case where one of the objectives of

					the tool is to support producers in setting their own sustainability objectives and achieving these.
95	NGOs	3. Measurable progress	General feedback	Recommend: "...towards the organisation's sustainability objectives as defined by their theory of change" or similar. This reinforces that the sustainability objectives are reliant on the organisation's theory of change. We welcome the introduction of performance levels as a clear measurement. However, the term "improvement pathways" is less clear. Even improvements should need to demonstrate a level of performance.	Version 2 attempts to use clearer language. Sustainability objectives are initially referenced in Sustainability impacts when their connection and importance to the theory of change is underscored. There is also a definition provided for sustainability objectives.
107	NGOs	3. Measurable progress	General feedback	Who are the «users»?	The term users is included in the definitions. For version 2 this has had a slight amendment for clarity and is defined as "Businesses (where businesses include producers and groups of producers) and other entities (such as government bodies) who implement or adopt standards or tools."
116	Companies	3. Measurable progress	General feedback	A tool developed by ISEAL, including minimum parameters for the achievement of positive change, based on the 3 pillars of sustainability: measurable, trustable, for the promotion and credibility of ISEAL's principles.	The principles are intended to define credible practice while remaining content neutral (i.e. encompassing a range of strategies whether these are low bar or high bar).
125	Standards and standards-like	3. Measurable progress	General feedback	This paragraph is not clear at all: The organisation's tools define performance levels or improvement pathways that result in users' measurable progress towards the organisation's sustainability objectives. Does that mean that the standards or codes are based on what is measured to define the pathway of improvement? The principle is better defined in the second paragraph; the first one is not clear.	Agreed that the wording was confusing. Version 2 attempts to use clearer language and avoids repeating definitions.

25	Consultants & researchers	4. Collaboration	General feedback	No mention of diversity as a factor in defining collaborations.	See Stakeholder engagement for the emphasis on diversity and inclusion.
33	Standards and standards-like	4. Collaboration	General feedback	As the sustainability market gets more crowded this will be more and more important. Not clear on what 'civil society actors' are	Support for the principle noted with thanks. See also the changes in version 2.
40	Accreditation bodies/CBs	4. Collaboration	General feedback	Propose to delete: "The organisation actively reduces duplication of efforts". This would limit opportunities to innovate. Also not sure how ISEAL would monitor and address this between ISEAL members.	See the changes in version 2.
56	Standards and standards-like	4. Collaboration	General feedback	I take issue with the phrase "actively reduces duplication of efforts." There are many duplicative efforts the world over, with lots of good work being done by multiple organizations - if an organization is doing good and having impact on an issue common to multiple organizations, I can't say I want any one particular organization to stop their work.	See the changes in version 2.
65	Standards and standards-like	4. Collaboration	General feedback	It leaves no room for any situation where partnerships are not possible. Maybe a competing standard refuses to partner. "Seeks to partner where possible" is less strong, but maybe it is alright to keep it inflexible?	See the changes in version 2.
91	Producer groups	4. Collaboration	General feedback	I like this one	Noted with thanks

96	NGOs	4. Collaboration	General feedback	We welcome the addition of defining the potential actors involved in collaborations (i.e., “public, private and civil society actors, as well as other sustainability systems”) as we believe collaborations should be as inclusive as possible. We recommend incorporating a reference to collaborations that seeks to address and overcome potential conflicts or disagreements between the organisation and other actors; this would encourage collaborations on tough discussions that are necessary to drive systemic change.	Noted with thanks. For references to resolving conflicts, please see Stakeholder engagement.
117	Companies	4. Collaboration	General feedback	How can it be measured? How can the parameters be set?	It is true that this will be a more difficult principle for which to develop requirements. In terms of how the principles inform the Codes of Good Practice, requirements related to this principle may be more moderate as a result. This will be open to consultation during Code revision.
4	Standards and standards-like	5. Added value	General feedback	Added value -Definite improvement here (capacity building added back in, albeit as an example). Not sure what “reliable markets” means here exactly. Surely it isn’t in the standard setter’s gift to help ensure a reliable (stable?) market for the producers? 100 – good intentions and systems of a standard are only useful if they are taken up by a critical number of users	Yes, in version 2 we have reframed further. We are trying to avoid the situation where explanations or examples could be interpreted prescriptively or where they depend on other factors outside the system's control. We are now emphasising the importance of demonstrating a clear business case as this is within the system's more immediate sphere of control.
26	Consultants & researchers	5. Added value	General feedback	I don't see any added value from this principle.	Noted. Hopefully the further amendments in version 2 better communicate the importance of this principle.

34	Standards and standards-like	5. Added value	General feedback	Does 'users' include Certification Bodies? If so, it is really the Organisation's responsibility to fairly reward their efforts? They often work with multiple (competing) Standard-Owners and should have their own business model. Really like the last paragraph but wonder if it should also show awareness to systemic impacts/enabling environment as well?	Users would not include certification bodies (and the definition for users we hope makes that clear). It's true that there is a link here to enabling conditions. In the end, the reference to systemic impacts was brought into Sustainability impacts as this should be considered alongside theory of change. For this principle, we did focus more on what is within the system's more immediate sphere of control.
41	Accreditation bodies/CBs	5. Added value	General feedback	The Principle is not specific enough and only focused on producers when "added value" could/should also consider civil society at large. The Principle could focus on something such as: "The organisation provides users with cost-efficient tools and systems that supports them in achieving clearly defined sustainability objectives and demonstrating positive impact that add value to civil society at large".	The general value of delivering positive impacts is addressed in Sustainability impacts. This principle is intended to deal more squarely with the business case for uptake and hopefully the amendments in version 2 make that clearer.
48	Standards and standards-like	5. Added value	General feedback	instead of reducing barriers to implementation maybe limiting/minimizing? Unless the goal is for existing standards to continue to reduce.	Reworded to clarify.

66	Standards and standards-like	5. Added value	General feedback	<p>"The organisation is accessible and does not unfairly burden producers." - Producers should be users and/or stakeholders, right? We define producers as raw material creators, and not supply chain processors. This principle overall seems to be multiple ideas that hint at added value, but are not directly tied to it. The first paragraph is fine, but the second paragraph (e.g. "operates efficiently" is too vague. For the third paragraph, we agree a system should add value, capacity building and access to finance is beyond scope in many cases and may not add value in others. For example, a site may already meet all our chain of custody requirements at a fabric mill and we have only added value by giving them a claim. No support is needed in many such cases. However, the raw material producer is where support would be needed most.</p>	<p>Yes, we have removed the reference to "producers" as it muddied the waters since they are also included in our definition of "users". In general, the amendments in version 2 are intended to make the meaning more explicit while also focusing more clearly on what is in the system's more immediate sphere of control. We hope these changes address your comments.</p>
74	Accreditation bodies/CBs	5. Added value	General feedback	<p>Accessibility is an important principles and should be considered as a stand-alone principle, like in 2013 version. It is important to list the mention the main aspects and entities that should have access to the participation. in particular, it is important to mention that the principle is applicable to standard-setter, users of the standards and assurance providers. this is an important condition to ensure transparency and impartiality, but in Version 1.2 this is not evident. we suggest to reintroduce the accessibility principle, or to enlarge the description of related aspects in the "added value" principle or in the "impartiality" principle. without a clear indications, we</p>	<p>We appreciate the importance of accessibility and our intent is to retain the aims of version 1 and raise the ambition level so that we see a more proactive approach to uptake. One point to note, the principle in version 1 was also very much focused on accessibility for the certified enterprise, and did not address CBs and ABs. These relationships are considered more in the context of oversight (and therefore the principles Reliability and Impartiality). Current requirements regarding these relationships can be found in the Assurance Code.</p>

				believe that there is a risk of interpretation and misuse of the concept of accessibility, affecting the overall framework in term of transparency and independence.	
85	Standards and standards-like	5. Added value	General feedback	For further clarification 'User' should be defined	Yes, it is defined.
97	NGOs	5. Added value	General feedback	“Reduces barriers to implementation” is ambiguous. What are the barriers? This needs clarification / definition. Our concern is ‘reducing barriers’ could lead to the weakening of the sustainability standards and tools for more users to come on board (thereby compromising outcomes and impacts)	The principles are intended to define credible practice while remaining content neutral (i.e., encompassing a range of strategies whether these are low bar or high bar). Barriers to access, however, are not about this choice of performance level. More specificity about accessibility and barriers to access can be found in the Standard-Setting Code and include things like not discriminating based on the size of the enterprise and providing materials in local languages. The choice of the term "barriers" is linked to the WTO Technical Barriers to Trade Agreement.
108	NGOs	5. Added value	General feedback	Sustainable value chain	The aim here is to recognise the market context without limiting the choice of language to product-based supply chains since sustainability systems also operate in the service sector, etc.
118	Companies	5. Added value	General feedback	What is the evidence used in the validation process and how can the impact of the responsibilities shared among all users be measured?	It is true that this will be a more difficult principle for which to develop requirements. In terms of how the principles inform the Codes of Good Practice, requirements related to this principle may be more moderate as a result. This will be open to consultation during Code revision.

126	Standards and standards-like	5. Added value	General feedback	The way it is set out, I don't think this principle is important. For me, the added value refers to how much the implementation of a tool contributes to my mission and to the development of my objective, and how I can quantify that value, whether it's an organisational value, for instance, or for the minimisation of risk, or for access to the markets. I should be able to identify what the user gains with the implementation of a tool. Added value does not mean taxing or charging the user for something, I think the meaning of added value is not properly described	Yes, what we are intending here is that the system can identify what the user gains by implementing the tool. We hope the amendments in version 2 and particularly the more direct reference to the business case for users make that clearer.
5	Standards and standards-like	6. Stakeholder engagement	General feedback	Noting that our previous comment on this has not been incorporated (that "accountable" needs to be clearly defined in this context)	Amendments were taken on board that intended to address this without resorting to providing further definitions. Version 2 is amended further to minimise confusion about meaning.
15	NGOs	6. Stakeholder engagement	General feedback	Stakeholder Participatory	Amended to make the importance of participation clearer.
27	Consultants & researchers	6. Stakeholder engagement	General feedback	No mention of diversity, particularly racial, in elevating stakeholder input. The process has to be more than non-discriminatory and inclusive -- it has to seek out more racially diverse input.	Amended to make the importance of a diversity of stakeholders clearer.
67	Standards and standards-like	6. Stakeholder engagement	General feedback	This reads very well but I am unclear about disruptive stakeholders that might be there with bad intentions. We have shared one such experience with ISEAL and the recommendation was to not let them join the committee.	Yes, if you have stakeholders applying to participate in committees when they don't support the terms of reference for those committees it is logical not to short list them for candidacy. At the same time, the principle also promotes dialogue (e.g., providing feedback on stakeholder concerns) and engaging with stakeholders to resolve conflicts.

80	Companies	6. Stakeholder engagement	General feedback	When stakeholders are empowered to participate, their input ensures that the organisation's sustainability objectives reflect the issues that matter most. --> Not sure if it always "ensures" that point. Could be reworded to "helps to" or something along the line.	See amended principle.
98	NGOs	6. Stakeholder engagement	General feedback	We recognize the improvements made from the previous version, particularly in regard to inclusivity, transparent feedback and an impartial complaint mechanism. However, we recommend that V1's specific wording of "meaningful and accessible opportunities to participate in governance, assurance and monitoring and evaluation" be reintroduced. Otherwise, as currently worded, the organisation is left to determine which decisions within their system will affect stakeholders. It is critical for these three system components – and standard development / tool creation – to include stakeholders. Decisions that affect stakeholders occur within these components. Specifically listing these components makes a clear expectation. We also find the removal of previously used terms "meaningful" and "empowering" disappointing (particularly as standard stakeholders ourselves) as it takes away a level of agency. We recommend reinstating these. We recommend adding that organisations should be responsive to solicited and unsolicited stakeholder input. From our stakeholder experience with ISEAL members, just receiving a response to stakeholder concerns can be difficult. A lack	Some further amendments made. However, specific system components are not mentioned as this is the level of detail that is appropriate to the Codes and could be limiting rather than comprehensive. Please remember that the principles themselves are not a normative reference. It is the Codes of Good Practice that serve as normative reference. "Empowerment" is reintroduced. "Meaningful" was not reintroduced as this is defined in context (in response to previous feedback received). The reference to responding to stakeholder concerns addresses the case of unsolicited input. And the reference to a balance of stakeholders addresses the final point.

				of follow up or action is also a problem. We also recommend including that stakeholder views and input are equally considered (i.e., industry vs. civil society).	
119	Companies	6. Stakeholder engagement	General feedback	Is it enough that the organisation has inclusive policies? How can the impact of inclusive policies be measured? Under which or what components will the inclusion criteria be measured?	See amended principle. However, questions of evaluation or measurement are not directly addressed in the principles as these are not a normative reference.
6	Standards and standards-like	7. Continual improvement	General feedback	Language of this may benefit from further editorial attention. It reads to me as if some of the terms have been thrown together in a somewhat random mix. For example, can you review the performance of an objective? When an organisation works to improve, is it only the "strategies" that it adapts? Surely it would also adapt its system and objectives?	Amended.
28	Consultants & researchers	7. Continual improvement	General feedback	"The organisation regularly reviews AND COMMUNICATES the performance ..."	Communication is addressed in Transparency
42	Accreditation bodies/CBs	7. Continual improvement	General feedback	The organisation regularly reviews the performance of USERS, its SUSTAINABILITY objectives and strategies, evaluating impacts and outcomes of USERS' activities, and applying the lessons learned to improve its system and tools.	Assessing the performance of individual users is addressed in Accuracy (now Reliability). This principle is intended to address the question of whether the tools and system are performing as expected. Reworded to clarify.
86	Standards and standards-like	7. Continual improvement	General feedback	It is important to state that the review of its system should not cause any confusion or adaptation difficulty at the implementation level	Yes, notifications and transition periods are at the level of technical detail that is addressed in the Codes of Good Practice (e.g., clause 5.9 of the Standard-Setting Code).
99	NGOs	7. Continual improvement	General feedback	We agree with the new title change and amendments.	Thank you!
113	Companies	7. Continual improvement	General feedback	This could, perhaps, be merged with another principle mentioned earlier	Yes, there are strong connections between measurable progress and continual improvement. Feedback from the review has led us to conclude

					that expectations in each of these areas are significant and so we are continuing to give each area the weight of a principle
120	Companies	7. Continual improvement	General feedback	Model tool	ISEAL does not develop tools directly, and the principles are intended to define credible practice while remaining content neutral (i.e., encompassing a range of strategies whether these are low bar or high bar).
7	Standards and standards-like	8. Impartiality	General feedback	Slight improvement on the last version. Good to add “avoid” as well as “mitigate” for Col, and to reference Col in relation to governance, operations, and assurance (previously just “operations”)	Noted with thanks.
16	NGOs	8. Impartiality	General feedback	Ok	Noted with thanks.
29	Consultants & researchers	8. Impartiality	General feedback	This principle mentions governance, but governance isn't further defined anywhere else in the principles?	Yes, this is the only specific use of the term governance within the individual principles. Elsewhere we reference governance by speaking to decision-making. Governance is also mentioned in the scope and objectives. The term is used in its plain English / dictionary sense.

75	Accreditation bodies/CBs	8. Impartiality	General feedback	Accessibility is an important principles and should be considered as a stand-alone principle, like in 2013 version. It is important to list the mention the main aspects and entities that should have access to the participation. in particular, it is important to mention that the principle is applicable to standard-setter, users of the standards and assurance providers. this is an important condition to ensure transparency and impartiality, but in Version 1.2 this is not evident. we suggest to reintroduce the accessibility principle, or to enlarge the description of related aspects in the "added value" principle or in the "impartiality" principle. without a clear indications, we believe that there is a risk of interpretation and misuse of the concept of accessibility, affecting the overall framework in term of transparency and independence.	Noted. See response to comment 74.
100	NGOs	8. Impartiality	General feedback	We welcome the amendments including the oversight of users' performance.	Noted with thanks.
17	NGOs	9. Truthfulness	General feedback	Ok	Noted with thanks.
30	Consultants & researchers	9. Truthfulness	General feedback	Claims are proportional to the nature of the system, reflecting the scope and design of the system => What does this mean?	See amended principle.
49	Standards and standards-like	9. Truthfulness	General feedback	Suggest clarifying/defining "verifiable"	Reworded to avoid reliance on the term verifiable.
68	Standards and standards-like	9. Truthfulness	General feedback	Can it be changed to "Truthful claims" for clarity?	Where possible, we are trying to keep the name of the principles to a single word, so we have not adopted this proposal.

87	Standards and standards-like	9. Truthfulness	General feedback	It is important that the background information of the claims are easy to understand by the general public	See amended principle.
101	NGOs	9. Truthfulness	General feedback	We welcome the amendments. We recommend the data and evidence to substantiate a claim should be made publicly available.	Thank you. See amended principle.
8	Standards and standards-like	10. Transparency	General feedback	Additions strengthen the principle, particularly the last sentence (why stakeholders need the information).	Thank you!
35	Standards and standards-like	10. Transparency	General feedback	Hope that 'important information' will be better defined when it comes to the codes of good practice; but appropriate for the principles.	Yes, this will remain an important area for elaboration within the Codes.
43	Accreditation bodies/CBs	10. Transparency	General feedback	Should be more specific on how transparency vs data privacy/confidentiality should be managed. Need to be specific about what information is considered "important information that should be publicly available". Some confidential information could be important. Propose to change "makes RELEVANT information THAT DOES NOT BREACH CONFIDENTIALITY OR DATA PRIVACY REQUIREMENTS AS PUBLICLY accessible"	Specific requirements about transparency and data confidentiality are elaborated within the Codes (e.g., clauses 4.4. and 6.3 of the Assurance Code) and we can expect these to remain important areas of practice for the Codes to address. The principle has also been reworded to clarify and we hope this addresses the editorial suggestion.
45	Standards and standards-like	10. Transparency	General feedback	Verifiable/verified data is used in 2 principles: Measurable progress and Truthfulness and it might be helpful to have a definition for that.	The language has been simplified in order to minimise the need for further definitions.
69	Standards and standards-like	10. Transparency	General feedback	I know it is covered in the codes, but I was thinking user transparency when I read this. The only thought was whether user	Thanks for raising this. We have expanded this to talk about stakeholders being able to understand and evaluate the system's processes, decision-making, results, and impacts. This should now be

				transparency to some degree should be mentioned here (e.g. who is certified).	more comprehensive of the kinds of information stakeholders might need in order to engage.
76	Accreditation bodies/CBs	10. Transparency	General feedback	this principle was more clear in 2013 version. some connections with the need to ensure Transparency in the assurance process and in "claims, labeling and traceability" should be added.	Thanks for raising this. We have expanded this to talk about stakeholders being able to understand and evaluate the system's processes, decision-making, results, and impacts. This should now be more comprehensive of the kinds of information stakeholders might need in order to engage. See also the amendments to Truthfulness.
81	Companies	10. Transparency	General feedback	By enabling stakeholders to understand how decisions are made or results achieved, the organisation's decisions and processes can be trusted. --> Would add stakeholders and users of the tools	Stakeholders would include users of the tool.
102	NGOs	10. Transparency	General feedback	The term "important information" is ambiguous. This needs to be defined to avoid confidentiality being used as an excuse to not share information with stakeholders.	This is defined through the requirements of the Codes of Good Practice.
109	NGOs	10. Transparency	General feedback	This is the basis of the legitimacy	Thank you. This is what we are hoping to define with the principles.
38	Accreditation bodies/CBs	Definitions	General feedback	Good that this section does not include the word "standard" as it opens the door to other initiatives that are not limited to standard setting organisations. However the definition of "Organisation" shall be adjusted accordingly without making specific reference to "Standards".	Yes, within the principles any usage of standard has been replaced with tool. This supports our aim to be more inclusive. There are a few moments, though, where we are trying to help people make this link between standards and tools and that includes the definitions and the introductory text.
1	Standards and standards-like	Definitions	General feedback	Noting that our previous comment on this has not been incorporated	Yes, as indicated in the previous comment log, definitions for monitoring and evaluation terms have been derived from those established in the Impacts Code (derived from the OECD glossary).
12	NGOs	Definitions	General feedback	Grievance Redress Mechanism	This is not a term used in the text so does not require a definition.

21	Companies	Definitions	General feedback	our interpretation of claims would go beyond 'promotional communications'. just our 2 cnts	The definition has been clarified.
22	Consultants & researchers	Definitions	General feedback	(System) No mention of management systems. Alternative language: Management systems for the design, execution, measurement and evaluation of management decisions.	The definition was not intended to define a generic management system but rather the specifics of a sustainability system. The name of the term has been amended to clarify.
32	Standards and standards-like	Definitions	General feedback	Sustainability is extremely difficult to define so the definition is unlikely to ever be perfect. Does 'Users' include certification bodies as businesses who implement standards?	Yes, agreed regarding the definition of sustainability. The Brundtland definition is not perfect but it is widely recognised. Users do not include CBs. Users is intended as the broader term to replace e.g., certified entities.
37	Accreditation bodies/CBs	Definitions	General feedback	Tool: Initiative TO ACHIEVE sustainability performance levels or improvement TOWARDS SUSTAINABILITY THAT SUPPORT THE EFFECTIVE IMPLEMENTATION OF VOLUNTARY STANDARD(S). System: The TOOLS AND PROCEDURES USED BY an organisation to establish AND IMPLEMENT A VOLUNTARY standard; to measure, monitor or verify performance or progress against SUSTAINABILITY OBJECTIVE(S); and to allow for SUSTAINABILITY claims. Strategies: The approaches and activities that the organisation applies to create POSITIVE IMPACT. Sustainability objectives: Intended outcomes and POSITIVE impacts. Disadvantaged stakeholders: WOULD PROPOSE TO REMOVE AS NOT CLEAR AND DOES NOT ADD MUCH CLARITY. Competence: HAVING SUITABLE SKILLS, KNOWLEDGE, EXPERIENCE, QUALIFICATION FOR A SPECIFIC TASK.	We are specifically aiming to extend the scope of the principles beyond standards to encompass other tools and approaches. Therefore, suggestions to limit the scope to standards cannot be adopted. Equally, impacts can be both positive and negative and this limitation in meaning cannot be adopted. The suggestion to withdraw references to disadvantaged stakeholders has been adopted. See also the amended text in Stakeholder engagement. The definition for competence has been deleted rather than amended as it is plain English usage / a dictionary definition and therefore unnecessary.

55	Standards and standards-like	Definitions	General feedback	I don't really think this is a common use of the word tool. Often in informal speech people use "tool" when they really mean something very specific - an electronic form, or online technical resource. I think a tool can be any sort of resource that helps the user to achieve the goals of the standard. Schemes often use the word tool to describe resources they provide to their stakeholders to help them meet the requirements in the scheme - but the definition here seems to say the tool IS the standard or scheme itself. I don't think the word is often used that way.	Yes, it is going to be take some effort to extend the use of the term tool to capture both standards and alternative approaches. However, despite extensive brainstorming, we have not been able to settle on a different term that would be easier to use and understand than tool.
60	Companies	Definitions	General feedback	(Tool) I think it could be linked to the definition of strategy to make it clearer rather than just linking it to Sustainability	We have tried to make the link to the sustainability system clearer. It is true that there is a link also to strategies, but providing examples of strategies might have created confusion in that definition.
62	Standards and standards-like	Definitions	General feedback	"Organisation" is replacing scheme owner, but it would be clearer to say "system owner". We ourselves use organization to mean the certified entity. "Stakeholders" by definition does include "users" (same for disadvantaged), but could/should it be added to the definition to be clear?	Use of the term organisation has been changed.
89	Producer groups	Definitions	General feedback	Never liked the word tool used in this manner. Perhaps 'technical measures' or 'catalyst' or 'requirements' though I admit these are pretty lame as well	Yes, it is going to be take some effort to extend the use of the term tool to capture both standards and alternative approaches. However, despite extensive brainstorming, we have not been able to settle on a different term that would be easier to use and understand than tool. We do appreciate the effort to propose alternatives though!

92	NGOs	Definitions	General feedback	Stakeholders (also known as interested parties): Suggested text: Individuals or groups who are interested in or who will be affected by the decisions or activities of the organisation or by operations of the industry (i.e., user) that implements or adopts the standard or tool. Stakeholders also include parties with protected interests such as rightsholders. Comment: Stakeholders are also those that are affected by the actions of the industry and company(ies) that the organisation seeks to engage or certify. Sustainability objectives: Suggested text: Intended outcomes and impacts as defined by the theory of change. Comment: important to highlight that outcomes and impacts link to the organisation's theory of change. Claims: Comment: add in examples to be explicit that these can be written or oral statements, as well as graphics such as logos and labels.	The further elaborations to the definition of stakeholders are not necessary and could create confusion as some will read this as an intent to limit the scope of the definition rather than clarify. With regard to the definitions related to monitoring and evaluation, the intent has been to limit the reliance on more technical terms and to lead with plain English terms. This has meant that theory of change is used in an explanatory sense in the main text and it would become circular to reference it again here. The definition of claims has been clarified and use of the term "communications" should be understood in its wider sense (i.e., not limited to written communications).
104	NGOs	Definitions	General feedback	The name could be understood as an euphemism for terms such as victims, losers or the affected, in particular if there are references to environmental conflicts generated by the projects or actions by a subject who has power, legitimacy and urgency	Amended and the reference in Stakeholder engagement has been reframed.
112	Producer groups	Definitions	General feedback	Sustainability: Covering the needs of the present generation and supporting the future generations' ability to cover their own needs. Sustainability has three interdependent dimensions: social, environmental and economic.	Phrasing retained so as to maintain alignment with the Brundtland definition.

121	Producer groups	Definitions	General feedback	The definition of result can be improved, so that it is a bit more specific.	With regard to the definitions related to monitoring and evaluation, the intent has been to limit the reliance on more technical terms and to lead with plain English terms. Greater specificity can be found in the Impacts Code.
122	Standards and standards-like	Definitions	General feedback	Tools: certification schemes, codes of conduct and alike tools, which provide the guidelines for the implementation of improvement within the sustainability framework. Sustainability objective: The point that is expected to be reached in the short or mid term, in the implementation of sustainability tools. Remediation: this is not a very clear word to describe what is desired, I think what should be used is something like «how to solve the impacts» or something like that.	The proposed amendments to the definition of tool will create confusion about what is meant by "sustainability framework" and these have not been adopted. The changes proposed to the definition of objectives have not been adopted as these are not only limited to what might be achieved through implementation of the tools; a system might have objectives that are achieved through other strategies, e.g., advocacy, capacity-building programmes, etc. The definition for remediation is now a definition for remediate in order to make it more active.
9	Standards and standards-like	Overall	Trends	Mostly to very satisfied, although the principles are still quite brief such that they could fit any number of aspects including "reflect current and future trends"!	Noted with thanks. It is also true that this is more likely to emerge at the level of the Codes.
10	Standards and standards-like	Overall	Guidance/case studies	Having one case study per principle would be most comprehensive (and consistent).	Noted with thanks.
11	Standards and standards-like	Overall	General feedback	We would be very interested to see a report on stakeholder comments for this consultation if ISEAL intends to produce one, including explanations/rationale for comments that were or were not taken into account (though we recognise it may not be possible to do this for each individual comment)	Yes, this has been published for both rounds of consultation.
18	NGOs	Overall	Trends	Ok	Noted with thanks.
19	NGOs	Overall	Guidance/case studies	In all sustainability framework band practice	Noted with thanks.

31	Consultants & researchers	Overall	Guidance/case studies	stakeholders; truthfulness; systems	Noted with thanks.
36	Standards and standards-like	Overall	Guidance/case studies	Collaboration - illustrating ways of working with others amongst the ISEAL membership Stakeholder Engagement Transparency - 'important information'	Noted with thanks.
44	Accreditation bodies/CBs	Overall	Trends	Principles should be more open as they are still mostly, even if indirectly in some cases, focused on traditional standard setting organisations. For example under the definition of Systems, the example provided refers to Standards. If landscape approaches are to be considered, how these principles would apply? for example, Would data-driven initiatives meet these principles? Instead of making reference to data driven or landscape approaches which are just means, ISEAL should refer to positive environmental and social impact. This would allow for other organisations to become ISEAL members based on specific and measurable social and environmental impact. To open up the organisation membership would also provide current ISEAL members to challenge themselves.	Thank you for your comment. It is true that the design of the system is a means to achieving impacts. You might be interested to know that we have recently launched a new membership structure. The structure is intended to broaden the scope of systems eligible to apply for ISEAL membership. You can learn more about this here: <a href="https://www.isealalliance.org/sustainability-news/iseal-has-new-membership-structure">https://www.isealalliance.org/sustainability-news/iseal-has-new-membership-structure</a>
50	Standards and standards-like	Overall	Satisfaction	Well done.	Thank you!
51	Standards and standards-like	Overall	Trends	It is hard to know how varied the systems will be and therefore how well it will apply.	True!

52	Standards and standards-like	Overall	Guidance/case studies	I think that would be very helpful for most of them.	Noted with thanks.
53	Government bodies	Overall	Other (quick comments)	The principles are important and relevant to different sectors and environments	Thank you!
54	NGOs	Overall	Other (quick comments)	Gonella and Zadek did rich work on this, I also worked with Dave Owen and Tracey Swift on this and my go to source is also Adrian Henriques - to add grit to our process of engaging to. My work in health services also revealed the importance of going to where the stakeholder is (not where you are) - Respectful comments	Thank you for sharing these references and insights.
57	Standards and standards-like	Overall	Guidance/case studies	This is probably not feasible, but it would be interesting to think about examples of organizations that do not embody all of the principles, and to see precisely which principles they do not adhere to and why.	Noted with thanks.
58	Consultants & researchers	Overall	Other (quick comments)	Having worked with sustainability and stakeholder engagement for more than 30 years I very much appreciate the work accomplished by isea. The thoroughness is clear. Current activities in similar initiatives now link and leverage the various streams. It would be expected that the next version of the documentation would link or as a minimum refer to: - UN SDGs - UN Global Compact - UNEP Guidelines for Social Life Cycle Assessment of Products and Organizations 2020 - AccountAbility 1000 Series on Stakeholder Engagement - Public Value Principles <a href="https://yourpublicvalue.org/principles/">https://yourpublicvalue.org/principles/</a> - Potentially GRI, IIRC, TCFD The difference	Thank you for these comments. Yes, in future guidance materials we do intend to point to further resources like the ones you mention. Thank you for taking the time to share these suggestions. And yes, we have considered feedback to both reduce and expand the number of principles. In the end, we felt that continuity with version 1 was also important and so continued to work with the idea of 10 principles.

				between isreal principles and the above is that isreal focuses on engagement for engagement's sake, not using engagement as a means to another end. While this is unique it could also be an challenge. From the above, a final comment is that there are many principles cited. Is it possible to reduce the number to a core of 4 or 5?	
59	Standards and standards-like	Overall	Other (quick comments)	The new version seems to be a mix between values (what "good" looks like as was outlined in V 1.1) and components of a management system (set context, drive for continuous improvement, assess impact, etc.). I didn't really resonate with the addition of management system components, not because I don't think it should be there, but instead because it seemed to be mixed in as opposed to clearly articulated. I'd separate the values (rigorous, transparent, etc.) from the management system (informed by context) aspects just to make it a bit clearer in the communication. Or perhaps the management system underpins the values? As it would in any good standard?	We have tried to reorder the principles so that these clusters of "types" of principles are in a more logical flow.
70	Standards and standards-like	Overall	Satisfaction	The updates overall were easier to distinguish between each principle compared to v1.0.	This is good to know. Thank you.
71	Standards and	Overall	Guidance/case studies	The transparency of sites themselves and what data must be shared by the system owner at minimum. Also added value as the	Noted with thanks.

	standards-like			assurance code requires added value through the assurance process itself.	
72	Companies	Overall	Other (quick comments)	<p>In general we think that the points they raise under each section in the principles are relevant and good. However we would prefer if they add a new section at the top where it more explicitly call out "Scope", and potentially also some reference to some due diligence effort to inform scope review on regular basis, with link to OECD Guidelines. They reference "scope" under "sustainability impacts", but we think this deserves greater call out to avoid confusion and support corporate due diligence efforts, as when standards today define their scope of attention, they can decide to exclude areas that a basic environment and human rights risk due diligence would identify linked to the focus of the standard ref OECD guidelines. As we all know many standards today don't have a social/human rights aspect as "out of scope", including severe issues with increasingly legal implications for corporations such as child labour and forced labour. We am not saying standards should/can be all encompassing – but I would expect that no matter scope, standard holders shall have some sort of principle that they shall raise severe concerns to users so we can take actions and/or not certify when these things occur. This is for example a likely outcome from the principles of "stakholder engagement", "continous improvement" and "added value". As an example, in June one scheme we work with</p>	<p>Thank you for this input. These practices are more at the level of implementation that we see outlined in the Codes of Good Practice (e.g., regular review of scope, more detailed information about what it means to identify the most significant or material impacts), but we note and appreciate the point being made about the connection to due diligence requirements and we will revisit this comment when undertaking revision of the Codes.</p>

				instructed these certifying bodies not to issue certifications if cases of child labour or forced labour were identified. Of course, this is no guarantee esp. if it isn't within the scope of a standard – but it raises an important point linked to some basic minimum ethical principle.	
73	Standards and standards-like	Overall	Other (quick comments)	Sustainability impacts “The organisation’s system focuses on the most significant or material sustainability impacts and outcomes in its scope” -> what is meant with ‘material sustainability impacts’? Measurable progress “The organisation and its stakeholders know if and how the organisation is making a difference.”-> what is meant with difference? Why not use the term ‘progress’? Transparency Important to include that similar users (certified clients) are treated equally (similar certification outcomes for similar type of clients)	The use of the term material is intended to make the link to environmental and social due diligence. You can also find the current requirements about identifying the most significant issues in Standard-Setting Code clause 5.1. The use of the phrase "making a difference" reflects our attempt to use simple language to talk about the results of the system while avoiding too much repetition. For the question of consistent assessments, please see the revised principle Reliability where this is now addressed.
77	Accreditation bodies/CBs	Overall	Guidance/case studies	Transparency. Plus a more focus of "accessibility" concept in the "added value" and "impartiality" principles	Noted with thanks.
82	Companies	Overall	Satisfaction	ISEAL Credibility Principles provide a good and easy to use (and understand) overview of key elements that scheme owners need to consider. (Which then need to be further detailed and operationalised for an expert audience and when analysing schemes).	Thank you. And yes, agreed the technical audience does need further details.
83	Companies	Overall	Guidance/case studies	Impact measurement	Noted with thanks.
84	Companies	Overall	General feedback	Importance of communicating about the intended use and purpose of the credibility principles.	See the introduction for version 2. We will also be taken this into account more generally following the publication of the principles.

88	Standards and standards-like	Overall	Guidance/case studies	Accuracy, Added Value, Sustainability impacts	Noted with thanks.
103	NGOs	Overall	Guidance/case studies	All should have examples of how to be applied 'in practice'. However, we find stakeholder engagement, continual improvement and transparency of importance.	Noted with thanks.
110	NGOs	Overall	Satisfaction	These enable the description of a transparent, legitimate, modern organisation	Thank you!
111	NGOs	Overall	Guidance/case studies	The one about 'continual improvement', because the case studies can show actual experiences.	Noted with thanks.
127	Standards and standards-like	Overall	Satisfaction	I think that the approach to the principles of Added value and Sustainability Impact should be revised. But in general, all the principles are basic and fundamental for an organisation to endorse.	Thank you. We also appreciate the additional suggestions and feedback you have provided about the individual principles.
128	Standards and standards-like	Overall	Trends	I think the approach is confusing, as I thought they were for an organisation to endorse and through their operation, to develop a system that includes the tools which would help them reach their sustainability objectives. This is how I understood the principles. Therefore, I can apply the principles to my organisation, to my system and my tools, in order to align my sustainability objectives. When you talk about data-driven and landscape approaches, what are we referring to? Can I say that an indicator validation checklist is a data-driven approach? Can I say that a biodiversity management programme at landscape scale is a landscape approach?	Sorry for the confusion we created through our framing of the question. You are correct. The principles are intended to be applied by organisations to support them in developing credible and effective systems (whether they are using tools like standards or the tools you mention or a combination of these).

				Shouldn't these be tools or elements be included in my system in order to reach my sustainability goals? Why are they placed out of it? I believe that I'm confused by this approach.	
129	Standards and standards-like	Overall	Guidance/case studies	Those about truthfulness and transparency, to see how the sustainability codes or standards verify or demonstrate the achievements in the field of that implementation	Noted with thanks.