



Item 03 – Pathways towards jurisdictional adoption of GRI Standards

For GSSB information and discussion

Date	01 May 2025
Meeting	15 May 2025
Description	This paper outlines the different adoption pathways jurisdictions can take to implement GRI Standards. The aim is to solicit feedback from the Global Sustainability Standards Board (GSSB) on identified pathways for jurisdictions. Specifically, do GSSB members agree with the options in the paper, or should they be modified in any way? Are there other options not covered in the paper that GSSB members consider important for the uptake of the Standards?

This document has been prepared by the GRI Standards Division and is made available to observers at meetings of the Global Sustainability Standards Board (GSSB). It does not represent an official position of the GSSB. Board positions are set out in the GRI Sustainability Reporting Standards. The GSSB is the independent standard setting body of GRI. For more information visit www.globalreporting.org.

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1 GRI Standards and regulatory adoption

2 GRI Standards are currently referenced in 477 policies worldwide, with six jurisdictions mandating
3 their use and 127 encouraging voluntary adoption, particularly across Asia-Pacific, Europe, and Latin
4 America.¹ As sustainability reporting becomes increasingly present in regulatory discussions,
5 policymakers seek clear and practical guidance on how to adopt and implement GRI Standards.

6 This paper outlines various pathways currently available under *GRI 1: Foundation 2021* for adopting
7 the GRI Standards at a jurisdictional level. The next step is to elaborate on these options in a
8 guidance document, which will be aimed at stakeholders within a jurisdiction that sets and regulates
9 corporate reporting. That may include agencies responsible for corporate reporting in public and
10 private sectors, securities regulators, stock exchanges, sector-specific regulators, and others that set
11 governance and oversight of organizations.

12 Adopting GRI Standards at the level of an individual organization falls outside the scope of this
13 guidance, as existing GRI Standards and services cover this well.

14 Pathways for adoption

15 Ahead of the development of the guidance, the following pathways have been identified to support
16 policymakers in adopting GRI Standards in their respective jurisdictions:

- 17 (a) **Gradual, full adoption:** This pathway involves phasing in the full application of all GRI
18 Standards over time, with the ultimate goal of organizations reporting 'in accordance with' the
19 Standards. The ambition is for all organizations to fully adopt the GRI Universal Standards
20 and relevant Topic and Sector Standards. Implementation can be staggered based on criteria
21 such as company size to facilitate this process. For example, the largest listed organizations
22 are in the first cohort, followed by smaller listed companies, and finally, smaller companies,
23 such as large SMEs with reporting obligations. This also gives organizations, particularly
24 those less familiar with reporting, the opportunity to upgrade systems and build internal
25 capacity.

26 Jurisdictions on this pathway can ease the reporting burden on organizations by adding
27 transitional relief to certain requirements in the GRI Standards, where compliance may be
28 challenging. For instance, the regulator could provide a grace period for entities to fully
29 comply with specific disclosures, such as those requiring significant effort to collect new or
30 more disaggregated data or apply technical measurement practices. An example could be
31 common transitional relief provided for reporting Scope 3 GHG emissions, where
32 organizations only disclose Scope 1 and 2 data in Years 1 and 2, with Scope 3 data only
33 required from Year 3. This means that a requirement in a Standard is operative and can be

¹ Carrots & Sticks: Recognizing the role of transparency to accelerate the SDGs, Annual Report 2024.

34 applied from its first application, but organizations are given a period before they are required
35 to apply it.

36 (b) **Targeted adoption:** This pathway allows jurisdictions to adopt a selected GRI Standard(s)
37 and/or individual disclosures to address a specific reporting need within a jurisdiction. For
38 example, a government could require specific organizations to adopt *GRI: 207 Tax 2019* to
39 promote greater transparency on tax payments. Similarly, a regulator could base a specific
40 disclosure requirement on the just transition disclosures in *GRI 102: Climate Change 2025*.

41 (c) **Hybrid adoption:** This pathway takes elements of both gradual and targeted adoption to
42 provide jurisdictions with a flexible and customized approach to adopting GRI Standards. It
43 allows for gradual adoption over time, alongside the possibility of reassessing and expanding
44 requirements as reporting capacity improves or new priorities emerge. For example, a
45 jurisdiction may first require organizations to comply with the GRI Universal Standards,
46 followed at some point by adopting certain Topic and Sector Standards. This could be
47 achieved by modifying the application dates of Topic and Sector Standards to give
48 organizations more time to build internal reporting systems and capacity.

49 A variation of this could be that a jurisdiction decides to apply the GRI Universal Standards
50 and some jurisdiction-specific disclosure requirements to meet its corporate reporting goals
51 sufficiently. This would be a terminal step as there is no intention to expand reporting
52 requirements in the short to medium term, but voluntary reporting against other GRI
53 Standards is still encouraged in regulation.

54 These different adoption pathways reflect the flexibility of the GRI Standards, allowing jurisdictions to
55 align sustainability reporting requirements with their specific policy goals, regulatory environments,
56 and organizational readiness. Regardless of the pathway chosen, capacity-building support from GRI
57 will also be available to support jurisdictions along each pathway and to establish communities of
58 practice to reinforce long-term, high-quality corporate reporting.

59 **Levels of adoption**

60 GRI Standards already envisage and provide flexibility for organizations to apply them in different
61 ways as the basis for their sustainability reporting. Jurisdictions are at liberty to tailor reporting
62 requirements to their policy objectives and the readiness of organizations to report against GRI
63 Standards. Therefore, policymakers can tailor their preferred adoption pathways to different levels of
64 ambition, such as 'reporting in accordance with GRI Standards' or 'reporting with reference to the GRI
65 Standards'.

66 ***Reporting in accordance with GRI Standards***

67 Consistent with most reporting standards, GRI Standards are intended to be applied in full, subject to
68 the application of materiality to select the sustainability topics relevant to the organization. The
69 application of GRI Standards in full is referred to as 'in accordance with', signaling that an

70 organization has complied with all applicable requirements and provided information on an
71 organization's most significant impacts.

72 *GRI 1* (Section 3) sets out the nine requirements that need to be satisfied to claim that a report is
73 prepared in accordance with the GRI Standards:

74 Reporting in accordance with the GRI Standards enables an organization to provide a
75 comprehensive picture of its most significant impacts on the economy, environment, and people,
76 including impacts on their human rights, and how it manages these impacts. This allows
77 information users to make informed assessments and decisions about the organization's impacts
78 and its contribution to sustainable development.

79 The organization must comply with all nine requirements in this section to report **in accordance**
80 **with the GRI Standards**.

81 **Overview of in accordance requirements**

82 Requirement 1: Apply the reporting principles

83 Requirement 2: Report the disclosures in GRI 2: General Disclosures 2021

84 Requirement 3: Determine material topics

85 Requirement 4: Report the disclosures in GRI 3: Material Topics 2021

86 Requirement 5: Report disclosures from the GRI Topic Standards for each material topic

87 Requirement 6: Provide reasons for omission for disclosures and requirements that the
88 organization cannot comply with

89 Requirement 7: Publish a GRI content index

90 Requirement 8: Provide a statement of use

91 Requirement 9: Notify GRI

92 If the organization does not comply with all nine requirements, it cannot claim that it has prepared
93 the reported information in accordance with the GRI Standards.

94 The GRI Standards are intended to be applied consistently as a package of disclosure requirements
95 to give a comprehensive view of an organization's most significant impacts.

96 Unlike financial reporting standards under regulatory frameworks, the GRI Standards set out
97 requirements when an organization cannot comply with all of them.

98 ***Reporting with reference to the GRI Standards***

99 An organization can report **with reference to** the GRI Standards if it cannot comply with all the
100 requirements for reporting in accordance with the GRI Standards. The organization should
101 transition to reporting in accordance with the GRI Standards in time as it will provide a
102 comprehensive picture of the organization's most significant impacts on the economy,
103 environment, and people, including impacts on their human rights.

104 The organization can also report with reference to the GRI Standards if it uses selected GRI
105 Standards, or parts of their content, to report information about specific topics for specific
106 purposes, such as complying with a reporting regulation on climate change.

107 The organization must comply with all three requirements in this section to report with reference
108 to the GRI Standards. The organization should also apply the reporting principles specified in
109 section 4 of this Standard to ensure high quality reporting. Additionally, the organization should
110 explain how it manages its impacts for the topics it reports on using Disclosure 3-3 in GRI 3:
111 Material Topics 2021.

112 Where an organization claims that it has prepared its report 'with reference to the GRI Standards',
113 three conditions must be met:

114 Publish a GRI content index

115 **The organization shall:**

- 116 a. **publish a GRI content index that includes:**
- 117 a. **the title: GRI content index;**
 - 118 b. **the statement of use;**
 - 119 c. **the title of GRI 1 used;**
 - 120 d. **a list of the reported disclosures from the GRI Standards, including the**
 - 121 **disclosure titles;**
 - 122 e. **the titles of the GRI Standards that the reported disclosures come from;**
 - 123 f. **the location where the information reported for each disclosure can be found;**
- 124 b. **if it publishes a standalone sustainability report and the GRI content index**
- 125 **is not included in the report itself, provide a link or reference to the GRI**
- 126 **content index in the report.**

127 Provide a statement of use

- 128 a. **The organization shall include the following statement in its GRI content index:**
- 129 **[Name of organization] has reported the information cited in this GRI**
- 130 **content index for the period [[reporting period](#) start and end dates] with**
- 131 **reference to the GRI Standards.**

132 Notify GRI

- 133 a. **The organization shall notify GRI of the use of the GRI Standards and**
- 134 **the statement of use by sending an email to**
- 135 reportregistration@globalreporting.org.

136 Where those conditions are not met, an organization cannot make any claim that the GRI Standards

137 have been used in the preparation of its report.

138 **Next Steps**

139 Based on the pathways discussed in the paper and the discussion in the GSSB meeting on 15 May

140 2025, the Standards Division will develop an outline for an adoption guide that explores jurisdictional

141 adoption in more detail.