



## NATIONAL SAFETY COUNCIL

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### Position/Policy Statement

#### Connecting Sustainability with Workplace Safety and Health

As we strive to improve the safety and health of all workers, the National Safety Council (NSC) supports policies to enhance the understanding and role of sustainability in workplace safety and health programs (and vice versa). Today, sustainability does not only refer to environmental impact, but it is now more holistic, including elements as broad as fair labor practices, corporate transparency and governance, and worker safety and health. To some degree, modern definitions of sustainability overlap with what are now termed “environmental, social, and governance” (ESG) issues. Voluntary framework and ratings agencies, such as the United Nations Sustainable Development Goals (SDGs), the Global Reporting Initiative (GRI), the Sustainable Accounting Standards Board (SASB), the Capitals Coalition, B Corps and others have helped to accelerate a more comprehensive definition of sustainability that is in many cases inclusive of basic safety and health metrics. In 2021, the Framework for Inclusive Capitalism called for health and safety to be fully integrated into organizations in its first recommendation.<sup>1</sup> In short, there is a growing consensus that sustainability is directly tied to employee safety, inclusion, and diversity when considering an organization’s ability to create and sustain a workplace or other environment where people feel safe and secure to be their true self.<sup>2</sup> This can include support for emotional and psychological safety for workers. Yet, the integration of traditional occupational safety and health (OSH) and sustainability remains challenging both theoretically and practically, and there is insufficient understanding of safety and health practice in the sustainability world and of sustainability among OSH professionals and practitioners.

While safety and health are increasingly included in conceptions of corporate social responsibility (CSR) and ESG, safety, health, and the overall wellbeing of the worker are often not fully integrated into broader sustainability frameworks or programs, which tend to focus on environmental impacts or narrower conceptions of CSR. In most cases, these frameworks view safety and health at its most basic level and, if included at all, focus on lagging metrics such as recordable case rate or number of fatalities, as opposed to looking at the topic through more comprehensive, proactive, and leading metrics and/or management system lenses. Safety and health are critical to a sustained and sustainable workforce and have direct impacts on businesses’ bottom lines. As such, they should be integrated into existing sustainability frameworks, programming, and reporting.

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<sup>1</sup> [Framework for Inclusive Capitalism: A New Compact Among Business, Government & American Workers, February 2021.](#)

<sup>2</sup> <https://centreforglobalinclusion.org/wp-content/uploads/2021/06/GDEIB-APRIL-2021-1.pdf>

Such steps elevate the important role of the worker in sustaining workplaces, provide mechanisms for ensuring safe and healthful working conditions, bring human and worker rights and value to conceptions of sustainability, and realize the distinct connection between worker health and environmental externalities and outcomes.

NSC supports:

- Integration of workplace safety and health into sustainability management systems and planning
- Increasing sustainability public disclosure and reporting that includes safety and health
- Increased reporting of workplace safety and health metrics in sustainability frameworks, standards, ratings, and award schemes
- Creation of consistent and standardized metrics for company reporting
- Tracking progress in the implementation of integrated management systems and the impact on safety and health outcomes
- Training that includes both workplace safety and health and sustainability to be incorporated into business school, safety and health professional curricula and other sectors
- Increasing the understanding of sustainability, CSR, and ESG practices within the safety and health profession
- Increasing the understanding of safety and health practices within the sustainability, CSR, and ESG profession, investor community, senior leadership, and with other stakeholders
- Implementing and tracking sustainability practices, including safety and health, across the supply chain to examine production and consumption impacts, and facilitating the uptake of these practices by smaller businesses
- Evaluating the impacts of sustainable practices, including worker safety, health, and retention
- Incorporating Diversity, Equity and Inclusion (DE&I) into an organization's sustainability program
- Incorporating emotional and psychological safety in workplace sustainability programs

More on each of these topics is found below.

## **Background**

### **Existing Frameworks**

The concept of sustainability has been adopted by various communities including the environmental movement, businesses, the finance sector, and movements around CSR, and led to the development of a variety of frameworks. The OSH ecosystem integrates work, business, consumption, and production into sustainability frameworks. Establishments like the International Organization for Standardization (ISO), International Labor Organization (ILO), the Global Reporting Initiative (GRI), the Sustainable Accounting Standards Board (SASB), the Capitals Coalition, and the United Nations (UN) Global Compact have developed sustainability standards and goals that include OSH. NSC supports efforts like the Embankment Project for Inclusive Capitalism to standardize and create consistent metrics to better enable reporting and

comparisons across organizations.<sup>3</sup> An overview of this and other standards and frameworks is provided below.

### *UN Sustainable Development Goals*

In the last decade, the UN Global Compact strove to align business development with global sustainable development principles through the Sustainable Development Goals (SDGs). In 2015, the 2030 Agenda for Sustainable Development, comprised of 17 SDGs that recommend actions to promote personal and environmental stewardship, was adopted. These SDGs led to the introduction of sustainability reporting guidelines and spurred growth in individual organizations (companies, local and state governments, and others) using the SDGs as a platform for decision-making and transparency. Several U.S. based organizations participate in working toward fulfilling the SDGs.<sup>4</sup> Notably, SDG number 8 addresses worker health and safety, and SDG number 12 focuses on sustainable consumption and production practices.<sup>5 6</sup>

Additionally, several other goals emphasize workplace health and sustainability, clearly making the connection between OSH and sustainability implementation.<sup>7</sup>

### *Global Reporting Initiative: GRI 403*

The GRI is recognized for having the world's most widely used voluntary standards for sustainability reporting for businesses, governments, industry groups, and not-for-profit organizations. One of these standards, "GRI 403: Occupational Health and Safety,"<sup>8</sup> was updated in 2018 with an effective date of January 1, 2021. GRI 403 changes how workplaces measure and report work-related injuries to capture the long-term impact of these injuries on workers as opposed to only focusing on lost time injuries (LTI).<sup>9</sup> While the standard was not fully effective until January 1, 2021, an assessment of the 2019 and 2020 reporting cycles – the first two cycles GRI 403 was available – found the three sectors of technology, services, and financials reported to the standard most often. In a more detailed analysis of the technology sector, researchers found specific work-related injuries were not being included as stated in the updated GRI 403 guidelines, which should be addressed.<sup>10</sup>

### *International Organization for Standardization*

The ISO develops voluntary, consensus-based, international standards to provide solutions for global problems. U.S. representatives participate at an increasing rate in ISO standards setting.<sup>11</sup> ISO standards are structured similarly to one another to allow for the integration and adoption of multiple standards.<sup>12</sup> ISO made the decision to support the UN SDGs in its

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<sup>3</sup> <https://www.coalitionforinclusivecapitalism.com/wp-content/uploads/2021/01/coalition-epic-report.pdf>

<sup>4</sup> <https://www.unglobalcompact.org/what-is-gc/participants>

<sup>5</sup> <https://sdgs.un.org/goals/goal8> SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

<sup>6</sup> <https://sdgs.un.org/goals/goal12> SDG 12: Ensure sustainable consumption and production patterns.

<sup>7</sup> <https://sdgs.un.org/goals>

<sup>8</sup> <https://www.globalreporting.org/standards/standards-development/topic-standard-project-for-occupational-health-and-safety/>

<sup>9</sup> <https://globalreportinginitiative.medium.com/can-new-metrics-stop-safe-wash-57f51632a769>

<sup>10</sup> <https://www.liebertpub.com/doi/abs/10.1089/scc.2020.0029>

<sup>11</sup> [https://www.nist.gov/system/files/nistir\\_8007-reviewofusparticip\\_isoiec-2014\\_0.pdf](https://www.nist.gov/system/files/nistir_8007-reviewofusparticip_isoiec-2014_0.pdf)

<sup>12</sup> <https://www.iso.org/about-us.html>

standards to help organizations also align their work toward fulfilling the SDGs because of the need to work holistically and collaboratively toward these overarching goals.<sup>13</sup> Relevant to the integration of OSH and sustainability are ISO 45001, ISO 14001, and ISO 26000, which are outlined below.

ISO 45001:2018 outlines a safety management system (SMS) that allows organizations a framework to provide a safe and healthy workplace and strive for continual improvement. ISO 45001 includes key success factors, including the integration of safety and health into organizational business processes, for the implementation of a successful safety and health management system and guidance on how to achieve them.<sup>14</sup>

ISO 14001:2015 Environmental Management System (EMS) standard, the most popular in the ISO 14000 series, encourages organizations to have policies supporting pollution prevention, continual improvement of EMS, and compliance with statutes and regulations. This standard also encourages businesses to conduct regular auditing and take corrective action as needed.<sup>15</sup>

ISO 26000:2010 provides guidance on organizational social responsibility that includes safety and health impacts on the workforce and communities in which the organization operates. There is clear alignment with OSH professionals and their roles in organizations. The goal of ISO 26000 is to work toward environmental health and safety (EHS) being viewed as a part of everyone's role at the organization.<sup>16</sup>

### **Moving Toward Integration: Opportunities and Challenges**

An Occupational Safety and Health Administration (OSHA) white paper published in 2016 identified seven main areas for growth in the sustainability space: reporting and metrics, investing and shareholder engagement, business, standards and certifications, procurement, education, and research.<sup>17</sup>

#### *Reporting and Metrics and Investing in Shareholder Engagement*

Public reporting of ESG began in the 1980s, and an increasing number of companies have been reporting these metrics since then.<sup>18</sup> Reporting metrics vary, but guidance from Sustainability Accounting Standards Board (SASB), GRI, and International Integrated Reporting Council (IIRC) provide sustainability models for reporting.<sup>19</sup> In June 2021, the Investment Company Institute wrote to the Securities and Exchange Commission (SEC) recommending consistent and comprehensive reporting on sustainability-related data.<sup>20</sup> These metrics would be easier to report and more consistent if oversight boards and agencies (SEC, SASB, GRI, etc.) established specific ones for Environmental, People, Community and Social Sustainability, including methods for calculating and measuring them based on the size of the organization. Additionally, boards and agencies should recommend a minimum number of metrics for inclusion in an

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<sup>13</sup> <https://www.iso.org/sdgs.html>

<sup>14</sup> <https://www.iso.org/iso-45001-occupational-health-and-safety.html>

<sup>15</sup> <https://www.iso.org/iso-14001-environmental-management.html>

<sup>16</sup> <https://www.iso.org/iso-26000-social-responsibility.html>

<sup>17</sup> [https://www.osha.gov/sites/default/files/OSHA\\_sustainability\\_paper.pdf](https://www.osha.gov/sites/default/files/OSHA_sustainability_paper.pdf)

<sup>18</sup> <http://www.rmacleannllc.com/publications/ces/EnviroReportCES2000w-copyright.pdf>

<sup>19</sup> Ibid.

<sup>20</sup> [https://www.ici.org/system/files/2021-06/21\\_itr\\_rfi.pdf](https://www.ici.org/system/files/2021-06/21_itr_rfi.pdf)

organization's public disclosures and reports and identify specific metrics for adoption that can create a baseline for commonality, and OSH should be part of the ones reported. NSC supports greater reporting along aligned metrics for more transparency.

### *Business*

A Campbell Institute white paper found leading companies are taking on "a broader, more holistic view of sustainability, of which safety plays a key role."<sup>21</sup> NSC supports the integration of organizational management systems, including the creation of sustainable jobs, greater transparency about sustainability, evaluation of contractors and suppliers, investing, and other metrics, to address workplace safety and health issues comprehensively and proactively. This integration and subsequent measurement, which some NSC members have already adopted, will also assist in understanding progress made and impacts on OSH outcomes.

### *Standards and Certifications*

Sustainable standards and certifications have been growing rapidly since the 1970s.<sup>22</sup> Examples include the Leadership in Energy and Environmental Design (LEED) for buildings, including the LEED [Prevention through Design \(PtD\) pilot credit](#) specifically focused on worker health and safety. In some cases, industries have come together to form standards on their own.<sup>23</sup> NSC recommends sustainability standards include worker safety and health and harmonize the reporting and evaluation of such efforts and programs. Additionally, NSC recommends sustainability standards increase reporting requirements for OSH to foster transparency around the impact and efficacy of OSH programs as they relate to sustainability and as standalone efforts.

### *Supply Chain*

Sustainable production practices have benefits to the environment, workers, finances, communities and more.<sup>24</sup> Even if a business has a zero carbon footprint, without examining all aspects of its supply chain, that may not be accurate.<sup>25</sup> There are tools to help businesses contract with sustainable suppliers. For example, the federal government created the Sustainable Facilities Tool to help with sustainable sourcing of goods and services.<sup>26</sup> NSC recommends OSH be included as a factor when assessing supply chain sustainability, and assistance should be provided to facilitate the uptake of these practices by smaller businesses.

### *Education*

Sustainability standards and guidance, goals, and programs that include the relationship between OSH and business practices have been in place for over a decade, as already

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<sup>21</sup> <https://www.thecampbellinstitute.org/wp-content/uploads/2017/05/Campbell-Institute-Profiles-in-Sustainability-WP.pdf>

<sup>22</sup> [https://www.oecd-ilibrary.org/environment-and-sustainable-development/a-characterisation-of-environmental-labelling-and-information-schemes\\_5k3z11hpdgg2-en](https://www.oecd-ilibrary.org/environment-and-sustainable-development/a-characterisation-of-environmental-labelling-and-information-schemes_5k3z11hpdgg2-en)

<sup>23</sup> [https://www.osha.gov/sites/default/files/OSHA\\_sustainability\\_paper.pdf](https://www.osha.gov/sites/default/files/OSHA_sustainability_paper.pdf)

<sup>24</sup> <https://www.epa.gov/sustainability/sustainable-manufacturing#:~:text=Sustainable%20manufacturing%20is%20the%20creation,employee%2C%20community%20and%20product%20safety>

<sup>25</sup> <http://www.sustainable-scf.org/index.html>

<sup>26</sup> <http://www.sustainable-scf.org/index.html>

mentioned in this policy position. Yet, they are not fully integrated into training of the next generation of business leaders and OSH professionals. Therefore, NSC believes holistic training that includes both sustainability and OSH should be incorporated into business school, safety and health professional curricula, and other appropriate sectors. This cross-disciplinary training approach can help better identify potential synergies for improving OSH, and community and business outcomes. Additionally, NSC supports education for both OSH and sustainability professionals on the value and integration opportunities on both sides in the context of ongoing professional development (workshops, training courses, etc.).

### *Research and Evaluation*

Similarly, OSH inclusion in and tracking of outcomes in sustainability efforts must be a priority. In order to ensure that investments are effective and have the intended positive impact, outcomes need to be tracked over time and across industries. NSC supports the evaluation of sustainability and safety and health frameworks to establish best practices, encourage collaboration, protect business investments, and identify programs, policies, and procedures that keep workers safe and healthy. Additionally, evaluation provides a level of accountability through a mechanism for ensuring safety and health efforts have the positive impacts they were designed to have and identify areas for improvement. Failure to evaluate these critical programs could lead to worker harm, waste of financial and human resources, poor public perception, and the inability for others to learn and adopt the most effective programs and systems for achieving their sustainability goals.

### *Diversity, Equity and Inclusion (DE&I)*

The Global Diversity, Equity & Inclusion Benchmarks (GDEIB) is a comprehensive maturity index for organizations that want to integrate DE&I more fully into their practices. In its model, it recognizes the interconnectedness of an organization's sustainability strategy and DE&I, and vice versa.<sup>27</sup> GDEIB also connects ESG with the UN sustainable development goals to "leave no one behind." GDEIB recommends the following actions to more fully incorporate DE&I into sustainability: be proactive in working with external stakeholders, embed DE&I in services and products, integrate DE&I into marketing and customer service, and practice responsible and ethical sourcing by developing and nurturing underrepresented suppliers.<sup>28</sup> NSC defines psychological safety at work as workers being able to show and be one's self without fear of negative consequences of self-image, status or career.<sup>29</sup> In other words, workers need to feel safe in order to be safe.

### **Other Considerations**

There are disparities in the impact of decisions on sustainable operations. The American Lung Association conducted a meta-analysis of this topic, noting race, income level, healthcare access, housing practices and other factors equate to greater exposure to particulate matter that contribute to adverse health impacts.<sup>30</sup>

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<sup>27</sup> <https://centreforglobalinclusion.org/wp-content/uploads/2021/06/GDEIB-APRIL-2021-1.pdf>

<sup>28</sup> Ibid.

<sup>29</sup> <https://www.thecampbellinstitute.org/>

<sup>30</sup> <https://www.lung.org/clean-air/outdoors/who-is-at-risk/disparities>

Moreover, we have an aging workforce. By 2030, the number of people 75 years old and older in the workforce is expected to grow by 96.5%.<sup>31</sup> Also, the share of the worldwide population that is 60 and older will increase from about 1 billion in 2020 to about 1.4 billion in 2050.<sup>32</sup> An older workforce and population brings with it healthcare concerns that could be exacerbated by non-sustainable practices. The physical and social environments in which people age directly impacts overall health.<sup>33</sup> To bring attention to this, the U.N. General Assembly declared 2021-2030 the Decade of Healthy Ageing, providing another way for organizations to act to support longer and healthier lives. Additionally, the National Institute for Occupational Safety and Health (NIOSH) offers tips to support workers of all ages through its *Total Worker Health* approaches.<sup>34</sup>

The earth's climate has been through cycle changes for millions of years.<sup>35</sup> Today, the increases in the temperature of the planet are directly linked to human activity.<sup>36</sup> A warming planet leads to extreme weather events that create serious safety and health hazards to workers.<sup>37</sup> For extreme heat alone, under a higher emissions scenario (Representative Concentration Pathway (RCP)8.5), it is estimated that nearly 1.9 billion labor hours will be lost annually by 2090 in the United States, with the Southeast and Midwest having particularly large losses.<sup>38</sup> This corresponds to an estimate of over \$160 billion dollars in lost wages per year by 2090 and more than \$47 billion annually in the Southeast alone.<sup>39</sup> <sup>40</sup> Even under the lower emissions scenario (RCP 4.5) wages lost are expected to be in the billions per year.<sup>41</sup> NSC approved an [extreme temperatures policy position](#)<sup>42</sup> that provides some examples of industries that may be subject

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<sup>31</sup> <https://www.bls.gov/opub/ted/2021/number-of-people-75-and-older-in-the-labor-force-is-expected-to-grow-96-5-percent-by-2030.htm>.

<sup>32</sup> <https://www.who.int/news-room/fact-sheets/detail/ageing-and-health#:~:text=At%20this%20time%20the%20share,2050%20to%20reach%20426%20million>.

<sup>33</sup> Ibid.

<sup>34</sup> [https://www.cdc.gov/niosh/twh/priority.html#anchor\\_1578410183952](https://www.cdc.gov/niosh/twh/priority.html#anchor_1578410183952)

<sup>35</sup> <https://climate.nasa.gov/evidence/>

<sup>36</sup> Ibid.

<sup>37</sup> "The Fourth National Climate Assessment (NCA4) assesses risks to the United States posed by climate and global change. Scenarios that represent a range of plausible future changes in key risk drivers, such as greenhouse gas emissions levels, weather and climate extremes, sea level, population, and land use, are used to guide NCA4's evaluation of specific climate-related risks in regions and sectors across the United States.

Consistent with previous NCAs, NCA4 relies on climate-related scenarios generated for the assessments of the Intergovernmental Panel on Climate Change (IPCC). The IPCC's Fifth Assessment Report, completed in 2014, used model-derived products from the Coupled Model Intercomparison Project Phase 5 (CMIP5) based on four "representative concentration pathways" (RCPs). These RCPs capture a range of plausible future greenhouse gas emissions pathways that drive the climate models.

For its assessment of physical climate science presented in NCA4 Volume I (Climate Science Special Report), NCA4 uses the full range of IPCC RCPs and CMIP5 products. For assessments of impacts, vulnerability, and adaptation responses presented in volume II (Climate Change Impacts, Risks, and Adaptation in the United States), NCA4 will focus on RCP 8.5 as a high-end scenario consistent with continued high emissions levels and RCP 4.5 as a low-end scenario consistent with implementation of significant mitigation measures. Other scenarios (e.g., RCP 2.6) may be used in addition where instructive, such as in analyses of mitigation issues. The use of RCPs 8.5 and RCP 4.5 as core scenarios is generally consistent with the range of emission scenarios used in NCA3."

<https://www.globalchange.gov/about/highlights/2019-scenario-products-supporting-fourth-national-climate-assessment>

<sup>38</sup> [https://cfpub.epa.gov/si/si\\_public\\_record\\_Report.cfm?Lab=OAP&dirEntryId=335095](https://cfpub.epa.gov/si/si_public_record_Report.cfm?Lab=OAP&dirEntryId=335095)

<sup>39</sup> <https://nca2018.globalchange.gov/>

<sup>40</sup> [https://cfpub.epa.gov/si/si\\_public\\_record\\_Report.cfm?Lab=OAP&dirEntryId=335095](https://cfpub.epa.gov/si/si_public_record_Report.cfm?Lab=OAP&dirEntryId=335095)

<sup>41</sup> [https://cfpub.epa.gov/si/si\\_public\\_record\\_Report.cfm?Lab=OAP&dirEntryId=335095](https://cfpub.epa.gov/si/si_public_record_Report.cfm?Lab=OAP&dirEntryId=335095)

<sup>42</sup> <https://www.nsc.org/getattachment/0b1f4f14-0a80-4ca7-9b1d-9e483c46a55e/w%20extreme%20temperatures%20173>

to heat concerns. Agriculture, construction, kitchens, and fire service are among some of these industries. Additionally, lower wage workers are more likely to live and work in places with greater heat exposure and suffer more health effects of excessive heat on the job.<sup>43</sup> A sustainable workplace is one that takes these factors into consideration to prioritize the health and safety of workers and make adjustments to limit the additive effects of operations.

Finally, the U.S. work environment is rapidly changing. The National Institute for Occupational Safety and Health (NIOSH) recently captured the Future of Work priority topics, providing a framework of topics across workplaces, work and workforce that all organizations should consider and address.<sup>44</sup>

Given the clear alignment and positive outcome sustainable business practices can have on the environment, health outcomes, worker safety and health, DE&I, business finances, and more, NSC supports efforts to integrate sustainable practices into workplaces to mitigate these and other potentially deleterious impacts.

*This position statement reflects the opinions of the National Safety Council but not necessarily those of each member organization.*

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<sup>43</sup> <https://ucla.app.box.com/s/14m6pj1alqt7rwb8ihq4lyqjhm2ueejj>

<sup>44</sup> <https://www.cdc.gov/niosh/topics/future-of-work/issues.html>