METACONVERSATIONS IN CREATING SUSTAINABILITY REPORTING

Janet Luft Mobus
Pacific Lutheran University

INTRODUCTION

This study examines and compares the rhetorical tone of two deliberations on developing sustainability reporting: development of limited mandatory reporting of legally binding remediation liabilities within the financial reporting framework, and the development of broad-scope voluntary reporting within the Global Reporting Initiative (GRI) reporting framework. The former represents a narrow and highly technical deliberation attempting to construe existing financial reporting treatment for contingent liabilities as applicable to environmentally related clean-up situations; essentially fitting a new organizational transaction into an existing organizational and institutional field. The latter represents a broad deliberation attempting to define a new and novel organizational and institutional field of corporate social responsibility reporting.

While the organizational sponsors of these two initiatives differ, similar interests actively participated in shaping each – corporate actors, accountancy organizations, financial sector participants. In addition, members of civil society interested in advancing greater transparency in corporate environmental performance joined the GRI development, suggestive of the broader scope of this reporting initiative. This last group of actors includes actual, as opposed to theoretically conceptualized, users of the reports around which the deliberations form. In both contexts participants were engaged in a process of making meaning, and of developing new institutional norms. Convincing argumentation is required to cast a preferred approach in winning terms that will be adopted as a new norm of sustainability reporting. The study utilizes institutional theory and the perspective of metaconversation developed within that by Robichaud et al. (2004). This perspective is applied beyond the scope of a single organization to examine ways in which discursive identities are used in efforts to expand and transplant these identities, and their rules of operation, to newly emerging communities of practice. The methodology of content analysis focusing on language-as-action is used to examine rhetorical strategies in the comment letters received by the American Institute of Certified Public Accountants (AICPA) and the GRI as part of these two deliberation episodes. The two deliberations are examined individually and also in comparison to one another in an effort to explore the discursive work that is undertaken.

BACKGROUND

Developing a reporting framework for novel phenomena like environmental and sustainability performance is significantly a process of sense-making. The phenomenon transcends the traditional boundaries of any single community of practice and engages multiple communities. The development process is invested with power processes and ideological relationships that are not obvious from a simple reading of texts included in any particular deliberation of focus (Boje et al 2004, 574). Organizations struggle internally to define practices and then to define themselves consistent with these practices. These same organizations also operate in institutional fields populated with other organizations, and within these fields of diverse participants negotiations of definitions of practice also occur. As a result, the two deliberation episodes of interest in this study are viewed as more than isolated conversations. They are viewed as instances of organizing meaning that are connected to other efforts to organize meaning, and they take place in a field that spans established institutional boundaries. The two sponsoring organizations that are involved – the AICPA and the GRI – each vie for recognition as a legitimate authority on environmental reporting, but the institutional domains in which the deliberations take place are markedly different.

For this study, 'institutions' are seen as "consisting of established and enduring patterns of beliefs and practices that apply at both the microlevel within organizations and at the macrolevel across organizations" (Lammers & Barbour 2006, 362). In organizational communication research, institutional rhetoric possesses established and enduring characteristics, and is seen as "externally directed corporate expression[s] of relatively formal collective entities" (Finet 2001, 274). Finet continues that this rhetoric is "intended to influence the larger social normative climate", including that in which other organizations with regulatory powers work (p. 274). There exists, then, a larger arena in which organizations employ institutional rhetoric in attempts to perpetuate existing norms across organizational settings.

Many of the participants who contribute to the deliberations on environmental reporting speak as representatives of other conversational/cognitive domains of participants and interests. This feature of speaking on behalf of others creates another level to examine, wherein each of these conversations on environmental/sustainability reporting is also a conversation that exists with respect to other conversations. 'Accountancy-related' participants and 'preparers' are roles that possess enduring perspectives that may be assumed by different individual actors in successive conversations about financial reporting and/or environmental/sustainability reporting. Through repeated conversations 'the preparer perspective' and 'the accountancy perspective' are established as relatively formal collective perspectives that may be used in other conversations, and they carry knowledge about norms and/or irregularities associated with these perspectives. In this way local conversations that serve to organize and reinforce local understandings yield organizing power that may be used in conversations beyond their primary local communities (Robichaurd et al. 2004, 622). These broader conversations can be seen as metaconversations that have the potential to carry the organizing understandings of one community of practice to another community of practice. The two deliberations of interest in this study form, then, a metaconversation. The functions of metaconversations are to ground particular texts as those of a collective of actors, and to instantiate the individual participants as speaking for other, more local-level, deliberations. These two deliberations can then be seen as action sites where “structures of power, legitimation, and meaning are worked out over time” (Robichaurd et al 2004, 631).

A GRI framework on sustainability reporting, lacking credibility within the stronger financial reporting/accounting discourse, will have insufficient power, on its own, to challenge the established institutional legitimacy of financial reporting. The GRI version of environmental accounting attempts to redefine what is accepted as appropriate organizational behavior by preparers in the domain of economic, environmental and social performance. The power to sanction or challenge organizational legitimacy creates a space wherein the effectiveness of voluntary codes of conduct like the GRI framework rests, and this makes it similar to the power possessed by auditing financial reports. The participation of accountancy organizations is likely influential in GRI Guidelines development, and may be viewed as the metaconversation of auditing (along with the embedded power relations therein) are offered as a ready transplant to the deliberation on sustainability reporting.

Financial reporting develops through a highly stylized process of deliberations, both public and private. The Financial Accounting Standards Board (FASB) and the AICPA are among the organizations actively involved in organizing, and orchestrating, these deliberations. Consistent with Keenoy et al. (1997) this study considers these deliberations, and the GRI deliberations, in the context in which they arise, including their social and political dimensions. The approach to discourse analysis is one of analyzing what is done with language in the specific social setting of designing environmental and sustainability reporting for use by others. This approach is concordant with examining texts as social practice (Potter 1997, 142). These two deliberation episodes are considered part of a larger discourse that carries consequences in the social world. Consistent with Alvesson & Karreman (2000, 1138) the actors are engaged in constituting and framing environmental and sustainability reporting, and this study assumes both deliberations are part of a 'grand discourse' shaping both how to talk about environmental/sustainability reporting by organizations as well as the meanings that develop about them.

Financial reporting operates in a changing social landscape. One focus of change relevant to this study is growing recognition of the impact of human activity on the natural environment, a significant part of which derives from economic activity. Evidence exists that users of financial statements want environmental accounting information from business enterprises (e.g., IRRC 1992; Carbon Disclosure Project 2002, 2004; GAO 2004, Patten and Freedman 2008) yet it remains underdeveloped.

Debating and responding to relevant economic sustainability issues might be expected within the accounting standards setting process on the basis of continuous development of standards relevant to contemporary issues. Exploring development of standards that reflect emerging conditions impacting the economic viability and performance of business enterprises should be the substance of accounting standards discourse. While the accounting literature includes research on corporate responses for environmental accounting (e.g., Deegan 2002 for summary), and environmental concerns frequently underlie academic calls for greater corporate social responsibility (e.g., Gray 2002, 690-691), there is less evidence on environmental discourse emerging from within the standards-setting arena. Understanding the delayed development of environmental reporting from within the boundaries of financial reporting requires understanding the context in which the latter develops.

Financial reporting constitutes a highly stylized network of relationships among parties that are expert in an area directly associated with commerce. Getting to the point where a sufficient quantity of relevant information about corporate performance can be presented to the users of financial reporting – an assumed audience whose interests are taken to justify accounting standards development - requires the cooperation of many participants representing a diverse set of interests.

One important coupling within this network of interests exists between auditors of financial reports and the accountants/management of the organizations responsible for producing the reports. Organizational accountants/managers render accounts about the organization's financial performance, and auditors examine and attest to the fairness of those accounts. Auditors hold exclusive legal rights and responsibilities granted by law. Charged with protecting the public interest in performing their professional duties, these same auditors operate in a very competitive business environment in which they must earn revenues paid by the organizations whose financial reports they scrutinize. Negotiating these client relationships frequently takes place within the context of negotiating the appropriateness of accounting treatments of specific transactions included in financial statements - treatments that may be preferred by clients but opposed or questioned by the auditor. These negotiations implicitly (and sometime explicitly) include the threat by clients to move the audit work to another audit firm if the current auditor doesn't agree to the preferred treatment (McCracken et at 2008, 380). In this context auditors walk a tightrope between public interest duty and client satisfaction.

Another important nexus of relations exists between accounting standards-setting bodies, auditors, professional accountancy trade associations, and organizational accountants/ management. These represent the groups of participants historically involved in developing and changing the financial statement reporting model by writing, vetting and adopting standards of preparing financial statements that become binding on accountants/management responsible for their preparation. These standards are also the framework against which auditors are bound when attesting to the fairness of the financial statements they audit.

These existing networks of relations among auditors/client organizations, and among standards-setting participants are constituted within, and supported by, a process of financial reporting development in which 'users' of financial reports, along with their needs and interests, are abstracted rather than explicitly solicited. The current conceptual framework in which accounting standards develop emerged mid-20th century. Supporting better decision making became the articulated purpose of financial reporting, and identifying users of financial statements as those whose decisions most needed support provided further focus to this purpose. Finally, particular users – creditors and investors - were elevated above all others, and the particular needs that they should wish financial reporting to support were also articulated (FASB 1978). All of these developments took place in journal articles, committee reports and commissioned monographs among accounting academicians, accounting practitioners, and audit practitioners. Logical discourse among experts, rather than direct engagement with the actual intended users of financial reports, focused on creating a rational basis on which to ground accounting standards debates (Young 2006, 588).

Existing relations also shape particular forms of communication within and through the financial reporting framework. Obstacles to developing a more transparent and responsive framework for environmental reporting that includes various actual stakeholders in the process beyond those experts already identified stem from this more fundamental level - existing relations between auditors and client firms, and among expert groups found in financial reporting. The current financial reporting model continues to develop within a field of hypothetical users that serve as justifications for standards. The result is a financial reporting model that perpetuates the logical constructions on which it rests rather than one that responds to actual users' informational preferences (ibid, 600).

In many ways, the Global Reporting Initiative (GRI) resulted from the financial reporting culture described above. A short description of its lineage reveals it was originally a project of a non-profit organization, Coalition for Environmentally Responsible Economies (CERES – after the Roman goddess of agriculture). CERES is a coalition of investors, environmental organizations and other interest groups working with companies to address environmental concerns. Responding to the Exxon Valdez oil spill in 1989, CERES published a ten-point code of corporate environmental conduct – the Valdez Principles – that corporations could publicly endorse as their environmental code of conduct. Embedded in the code was the expectation that corporations periodically report publicly on their environmental performance and progress toward environmental goals. In 1993, Sunoco became the first Fortune 500 Company to endorse the CERES Principles (CERES, 2009). The Valdez Principles gained inspiration from the Sullivan Principles, an earlier voluntary code of conduct which proved effective in regulating the conduct of firms doing business in South Africa. The consequence of these efforts was convincingly demonstrated by bringing to bear public pressure and negative publicity resulting in 154 American firms ceasing operations in the region and withdrawal of more than $480 billion in invested funds by pension funds, endowments and other investment pools from companies engaged in commerce with South Africa (Sanyal and Neves, 1991).

The Valdez Principles were renamed the CERES Principles, and in 1998 they became the original kernel of the Global Reporting Initiative - a collaborative project between the Tellus Institute (a U.S. – based think tank focusing on sustainable development issues) and CERES. The United Nations Environment Programme became a partner in the development of the GRI Guidelines in 1999 when an Exposure Draft of the first comprehensive reporting framework was distributed for public comment. This Exposure Draft resulted in the first GRI Reporting Guidelines, released in 2000 for public use. In 2001, CERES spun off the GRI project into the separate and independent organization which it remains today (GRI, 2009). Since its inception as an independent organization, the GRI has been involved in continuous interaction with users and preparers of reports about the Guidelines. This has progressively helped develop the framework.

Taking an independent approach to developing sustainability reporting that includes direct stakeholder engagement, the GRI seeks to address the inadequacy of sustainability information currently found in the financial reporting framework. Direct engagement with actual users of sustainability reports marks one of the distinctive features of the GRI Guidelines development in comparison to development of financial reporting standards. At the same time, however, the GRI aspires to the reputation for usefulness, reliability and credibility enjoyed by the financial reporting framework. Based in Europe, the GRI strives to promote reporting sustainability information that “enables companies and organizations to report sustainability information in a way that is similar to financial reporting” (GRI, 2012). The framework has developed to the point where assurance statements are common wherein organizations seek an opinion from an independent assurance provider on the fairness of their sustainability report, much as organizations seek an audit opinion on the fairness of their financial reports. Many assurance opinions on sustainability reports are undertaken by large accounting organizations as these organizations seek to expand the market for their expertise in the audit/assurance service. However, unlike financial reporting, sustainability reporting and seeking independent assurance on sustainability reports are entirely voluntary undertakings by organizations.

The GRI project represents an effort to develop a legitimate reporting framework that is, in some ways, modeled on the financial reporting framework. At the same time it recognizes an implicit shortcoming of the financial reporting framework – lack of direct voice of intended beneficiaries, or users – and seeks to remedy that shortcoming. The substantive content of the GRI framework extends beyond that of financial reporting to include social and environmental reporting, yet organizational performance on these expanded areas impact organizational financial success as organizational stakeholders show increasing levels of concern for these broader performance profiles in evaluating investments. Governmental and non-governmental bodies also increasingly look to sustainability reports for information relevant to their own interactions with reporting organizations. Accountancy-related participants' interest in the GRI development efforts is not surprising. The GRI effort acknowledges strengths of the financial reporting framework and aspires to emulate some of these; yet also recognizes shortcomings and aspires to avoid these. And accountancy-related participants are aware of an opportunity to expand their scope of practice and expertise into the new domain of sustainability reporting as the provider of assurance services. Audit and assurance rest on a “logic of auditability” that consists of two primary components: negotiating an acknowledged and accepted base of knowledge that posses legitimacy (auditor expertise), and finding environments which are amendable to its application. This is an active process that Powers explains as “making things auditable” (1996, 289). The task remains to negotiate the meaning of sustainability reporting and a diverse set of participants have a diverse set of interests in influencing the outcomes of this negotiation.

This study examines and compares the rhetorical tone of two deliberations on developing sustainability reporting – development of limited mandatory reporting of legally binding remediation liabilities within the financial reporting framework, and the development of broad-scope voluntary reporting within the GRI framework. The former represents a narrow and highly technical deliberation attempting to construe existing financial reporting treatment for contingent liabilities as applicable to environmentally related clean-up situations – fitting a new organizational transaction into an existing organizational and institutional field. The latter represents a broad deliberation attempting to define a new and novel organizational and institutional field of corporate social responsibility reporting. While the organizational sponsors of these two initiatives differ, similar interests actively participated in shaping each – corporate actors, accountancy organizations, financial sector participants. In addition, members of civil society interested in advancing greater transparency in corporate environmental and social performance actively participated in the GRI development, providing evidence of the broader scope of this reporting initiative. This last group of actors includes actual, as opposed to theoretical, users of the reports around which the deliberations form.

DEVELOPING ENVIRONMENTAL AND SUSTAINABILITY REPORTING

In the following analyses data are drawn from raw scores on DICTION master and component variables. These raw scores are used as dependent variables to compare the mean values across interest group categories for significant differences in rhetorical tone. The interest group categories in both the SOP and GRI comment letter data sets are: accountancy-related, preparer, or user. The comparison of means is undertaken using ANOVA models.[i]

First Efforts at Environmental Reporting from within Financial Reporting

With respect to developing environmental reporting, the first and perhaps most substantive response within the financial reporting framework remains Statement of Position (SOP) 96-1, issued by the Accounting Standards Executive Committee (AcSEC) of the AICPA in 1996. The AICPA received 77 comment letters from interested parties during the due-process deliberations giving rise to this standard, with the overwhelming majority coming from corporations responsible for preparing financial reports, industry trade associations representing corporate interests, and public accounting and auditing organizations. These groups of interests are referred to as preparers and accountancy-related respectively.

This deliberation was a scripted and carefully delineated effort to support and/or modestly modify an accounting standard that was already substantially developed. Comment letters are received as part of the due-process of public vetting which occurs at the end of a lengthy development process. The SOP standard construes environmental remediation costs as a specific instance of the already understood general condition of contingent liability.

The conversation that takes place during this deliberation is among a network of participants commonly involved in developing accounting standards. Each of these interests has spoken before in accounting standards deliberations and they understand the “correct order of things” from the perspective of the financial reporting framework. It is perhaps not surprising, therefore, that no significant differences in overall rhetorical tone between these interest groups is found in a DICTION analysis of the comment letters (Mobus 2011, 79).

A subset of these letters, however, contained an off-script discussion embedded in the otherwise carefully delineated deliberations. A small group of 16 letters mention the narrowness of the scope of the proposed standard in comparison to the relatively broad topic of environmental performance and obligation, thereby going outside of the script suggested by the AICPA in its solicitation for comments. Examples of comments articulating this include (Mobus 2011, 86):

> [T]he scope of the SOP should be expanded.
> The draft SOP excludes treatment of voluntary remedial actions from its scope.
> [T]he AICPA is proposing a narrowly construed SOP on environmental liabilities.
> [B]efore adopting definitive guidance for this type of accrual in one narrow area, we believe [an authoritative standards-setting body] should establish the appropriate framework.

This deliberation demonstrates two points of interest: First, most comments conform to the narrow set of technical questions posed by the AICPA as the focus of their request for comment, resulting in a proposal for organizing a novel phenomenon within relatively familiar domains of talk. The SOP serves to reinforce and perpetuate existing solutions and is an example of a local community of practice upholding itself. Second, additional off-script comments serve to reveal possibilities of addressing the phenomenon of environmental performance from a broader perspective, even one that may challenge the established and usual order. Preparers of reports and accountancy-related members that audit reports represent interests that are familiar with one another in the context of addressing accounting issues within the financial reporting framework, and the narrow scope of the scripted deliberation provided another opportunity for reinforcing existing rationales. Robichaud et al. (2004,621) posit this recursive use of language as a metatext where “the same conversational procedure that is operative in the construction of a text is also operative in the embedding of that text within another text”. By construing environmental liabilities as a special case of contingent liabilities an existing rationale is used repeatedly over time, perhaps with some modification, and serves to continuously reinforce the organization of thought and practices that are separated in time. As rationales are applied and embedded within other contexts a metanarrative emerges in which individual actors may change from one specific conversational episode to another, but typical roles are played repeatedly with familiar repertoires of “canonical plots, goals, action sequences” expressed (Robichaud et al. 2004, 623). Communications within these metanarratives are fairly routine because of an accepted, almost contractual, understanding among participants about the fundamental organization of thought and action, and on existing relationships among participant groups.

However, threats to the existing order arise when, for example, competing narratives develop and attract participants, or when alternatives emerge among existing collective voices. This is a new opportunity for 'organizing' where a diversity of representatives engages, or fails to engage, in an established metaconversation. These communication exchanges can challenge the existing organization of thought and practice. The minority of off-script comments in the SOP deliberations can be thought of as signaling the possibility of such a challenge. This study picks up the deliberations of the GRI Guidelines as a continuation of this challenge.

First Efforts at Environmental Reporting from the Global Reporting Initiative

One of the problems that the GRI seeks to rectify, in comparison to financial reporting, is the narrowness of interests directly involved in setting reporting standards. Accordingly, GRI has adopted a multi-stakeholder governance process to developing sustainability reporting standards. Sustainability reporting includes economic performance reporting (although not in the form articulated in financial reporting) but goes beyond those boundaries to include organizational reporting on environmental and social performance also. Existing relationships found in financial reporting between primarily preparers and accountancy-related actors tend to dominate financial reporting deliberations, while 'users', as stated above, are theoretically constructed and spoken for. The GRI explicitly seeks to reconstitute these relations by broadening the scope and increasing the transparency of sustainability reporting.

By explicitly including a wider range of stakeholders in developing reporting content, including actual report users, the GRI pursues a different standard setting process. Furthermore, actual users of sustainability reports typically include a wider net of users beyond the (mostly) financial users found in financial reporting. The GRI framework – the “Sustainability Reporting Guidelines” - has been envisioned as a globally applicable framework capable of guiding sustainability reporting by organizations. To make it useful to all sectors and industries, the effort depends heavily upon the proactive involvement and philosophic support of the worldwide community including those who prepare the reports, those who attest to their content, and those who use the reports for insights on organizational performance. The protocol for developing the framework encompasses a commitment to continuous improvement through periodic evolutions of the framework, and relies crucially on the process of direct stakeholder engagement.

The GRI Guidelines represent an ambitious undertaking that attempts to step outside the limits and boundaries of current financial reporting. At the same time, the Guidelines clearly aspire to the credibility generally held by the financial reporting framework. All other things equal, contributions to the development of the framework should reflect participants' variable appetite for what would be a considerable expansion of the information reported by corporate actors in an area steeped in the public interest.

The first Sustainability Reporting Guidelines were issued as an Exposure Draft in 1999, and the June 2000 Guidelines we published after a period of testing and public comment. A two-year revision process began immediately, and the 2002 Guidelines reflect the public comment of stakeholders and preparers worldwide. In 2006 the G3 Guidelines were issued and are the current version of the GRI Sustainability Reporting Framework. Changes from the 2002 Guidelines to the G3 largely consist of reorganization of performance indicators to reduce redundancy rather than material changes in the content of the performance indicators. Beginning with the G3 Guidelines, the evolution of the Guidelines became one of incremental revision rather than fundamental shaping. The GRI explained the G3 revision process as a “change from the previous revision cycles, in which the entire set of Guidelines were subject to revision. Going forward, GRI will use a process involving incremental updates...” (GRI 2010) while focusing additional energy on industry sector-specific supplements to the core Guidelines. Importantly for this study, the 2002 Guidelines remain the fundamental backbone and content definition of the Sustainability Reporting Framework, and debate surrounding that iteration represents the last comprehensive forum on fundamental issues spanning the entire scope of the framework. Therefore, the discursive work undertaken in the comment letters on the 2002 Guidelines remains important and worthy of close study even though the G3 Guidelines currently guide reporting practice.

Seventy eight comment letters were received in response to the GRI's solicitation for input in mid-2002 in the first major evolutionary development of the Sustainability Reporting Guidelines since the original Guidelines were issued in 2000. Of these, 64 can be identified as speaking for preparers, accountancy-related interests, or users of sustainability reports.

Analyzing GRI Comment Letters

Examination of the rhetorical tone of the GRI comment letters shows that users are significantly more Satisfied with the proposed GRI Guidelines than accountancy-related participants. Satisfaction, a component of master DICTION variable Optimism, is associated with positive affective states and moments of triumph. A comparison of the mean values on this variable show users significantly more Satisfied in their comment letters than accountancy related participants. Mean values on Satisfaction are: Accountancy related: 1.50, Preparers: 2.27, and Users: 2.65. The F-test statistic comparing means is 4.60 which is significant at the .017 level; and post-hoc tests comparing the three groups shows that accountancy-related letters display significantly less Satisfaction than users' letters, but not significantly less than preparer letters. An example of the tone of Satisfaction offered by a firm that manages a group of mutual funds (a user of GRI reports) targeting socially responsible firms follows.

> I appreciate the opportunity to offer a comment on the draft of the 2002 Sustainability Reporting Guidelines issued April 1, 2002. I was impressed with the scope and the detail in the Guidelines. I would like to propose for your consideration another diversity indicator. Because issues of diversity often spawn government or legal actions (particularly in the United States, but also abroad), please consider adding one more indicator... Again, congratulations on the fine work on the Guidelines.

The next exploration of interest of master variables is the comparative use of Certainty terms. Components of this variable for which significant differences exist include: Leveling terms, Collectives, and Variety. The post-hoc test reveals that users and accountancy-related participants use significantly different levels of Certainty terms, as do accountancy-related participants and preparers. Table 1 below shows mean values, test statistics, and the group comparisons of means on component variables with significant differences.

Means	Leveling	Collectives	Variety
Accountancy	7.71	3.26	0.29

Preparer	5.38	5.81	0.43
User	5.76	5.55	0.41
Model F-test	7.59	11.15	4.73
(p-value)	(.003)	(.000)	(.012)
Group comparisons of means (p-value)			
Accountancy (comparison group)			
Preparer	(.004)	(.003)	(.009)
User	(.039)	(.004)	(.024)

Accountancy-related participants speak with the highest Leveling terms, terms which ignore individual differences and build a sense of completeness and assurance. At the same time, they speak with the lowest level of Collective terms – reflecting a higher degree of dependence on categorical modes of thought; and the lowest level of Variety – where a high score indicates avoidance of overstatement and a low score indicates a tendency toward overstatement.

The final master variable of interest for exploration is Commonality – language indicating agreed-upon values and rejecting idiosyncratic modes of engagement. The component variable that distinguishes the groups is Centrality, with letters from accountancy-related participants using significantly more terms rejecting idiosyncrasies than the user group, but not significantly more than the preparer group. The Centrality component variable speaks to institutional regularities and/or substantive agreement on core values. Terms of conformity and predictability are also salient to this component. Mean values for Centrality are: Accountancy-related: 8.99; Preparers: 7.19, and Users: 5.93. The F-test for the model is 3.805 which is significant at the 0.028 level. A post-hoc test of differences between Accountancy-related and User groups is significant at the 0.030 level.

The foregoing patterns of language use reveal significant differences between accountancy-related participants and user participants in commenting on the GRI Guidelines, and substantial similarity between accountancy-related and preparer participants. Accountancy-related participants are not more or less Optimistic than preparers, and they do not differ significantly from prepares in the use of language highlighting agreed-upon values. Accountancy-related participants are considerably more Certain than either of the other participant groups, indicating greater resoluteness and less flexibility.

The letters from the accountancy-related participants are of particular interest for more closely examining basic definitions of constructs. A level of hazard exists in the GRI Guidelines development springing from the fragility of the construct “environmental accounting” among competing visions of its meaning. Environmental accounting depends, for its institutional vigor, on two broader discourses – environmentalism and financial reporting/accounting. These two distinct discourses contain numerous points of incoherence and/or contradiction between them. The discourse of financial reporting/accounting, underpinned as it is by even more elaborate discourses on business and economic development, is much stronger (Livesey, 2002). By comparison, environmentalism provides a less structured alternative social construction of environmental performance.

A qualitative analysis of these comment letters reveals that accountancy-related participants speak on behalf of the interests of preparers much more frequently than on behalf of users' interests (Mobus & Fogarty 2009, 41). One of the dimensions along which concerns for preparers' interests emerges regards the extensiveness of the proposed disclosures. This concern is also linked to two other preparer relevant issues: an implicit warning that the GRI framework would only gain status if it became widely adopted by preparers, therefore the GRI should not make too heavy disclosure demands; and an effort to allow preparers to stipulate that, even with a reduced scope of disclosures their reports earned the imprimatur of the GRI-designated terminology that the reports were “prepared in accordance with the GRI Guidelines”. As the GRI framework becomes more widely established, this latter designation carries with it the legitimacy of responsible sustainability reporting for organizations able to employ it. This concern for preparers' needs comes despite the theoretical primacy of users' needs within financial reporting regimes that accountancy organizations primarily operate. Examples of these discursive plays by accountancy-related participants follow.

> The establishment of the systems and processes necessary to collect the requisite data for certain indicators would be cost-prohibitive for many organizations.
>
> The current draft Guidelines contain too many core indicators...most core indicators would have many data components and involve many systems and processes. Reporting on this scale would not be manageable for many organizations.
>
> The task force believes that for the GRI to succeed in developing an appropriate framework for sustainability reporting it should enhance the potential for widespread practical application of the Guidelines.

> We recommend that the GRI adopt a reporting scheme that is more manageable for the average organization in order to encourage a larger number of entities to adopt the Guidelines.
>
> We do believe that the core indicators required by the 2002 Exposure Draft are too voluminous and will discourage too many organizations from even attempting to report under the GRI Guidelines.
>
> Although the draft Guidelines permit an incremental approach to implementation, it does not appear that such reporters would be permitted to state that their report is “a true and fair representation of their organization's sustainability performance” unless they include each of the core indicators...[w]e recommend that the GRI allow organizations to report on one or more aspects...and state that such report is in accordance with relevant parts of the Guidelines.

These results can be interpreted as an indication of the existing network of relations between accountancy-related actors and preparers within the financial reporting arena, and an effort to insinuate existing points of order from that arena into the newly emerging sustainability reporting arena. They represent discursive negotiations in which accountancy-related participants speak with certainty on behalf of preparers, express dissatisfaction with important aspects of the GRI Guidelines development, and reject seemingly idiosyncratic demands that the Guidelines contemplate for preparers of sustainability reports.

Comparing SOP Deliberations and GRI Deliberations

A final comparison of interest in this study is between the discursive approaches used by accountancy-related participants and preparers in the SOP deliberation as compared to the GRI deliberation. Both of these groups are involved in both deliberation episodes. Users of financial statements will not overlap, as an interest group, as completely with users of GRI sustainability reports because NGOs and other non-profit organizations participated in the GRI Guidelines deliberations but not the SOP deliberation. This difference in participants importantly distinguishes these two events and highlights the extent to which the domain of 'reporting' is up for renegotiation in shifting from financial reporting to sustainability reporting. It is of interest to examine the differences in rhetorical approaches used by the two interest groups that overlap the two deliberations as the domain of talk shifts from the established community of practice of financial reporting to the emerging community of practice of sustainability reporting.

As a point of first comparisons all 77 comment letters from the SOP deliberation are compared to all 64 comment letters from the GRI deliberation at the level of DICTION's master variables. All of the master variables except Activity show significant differences in rhetorical tone. The GRI deliberations show significantly higher levels of language exhibiting Optimism, Certainty, and Realism, but significantly lower levels of language exhibiting Commonality. These results support the notion that the discursive tasks undertaken are quite different between these two episodes.

The next comparisons undertaken examine accountancy-related letters from the SOP deliberation with the same interest group's letters from the GRI deliberation, and preparers' letters from SOP with the counterpart GRI letters. These comparisons allow insights into the application of roles and perspectives from the established domain of financial reporting to the emerging domain of sustainability reporting. They allow observing a process at work in which a meta conversation enfolds and goes beyond the conversation of the local community of practice of its constituents. Of the 77 comment letters submitted to the SOP deliberation, 14 came from accountancy-related participants and 50 came from preparer participants. Of the 64 letters used from the GRI deliberation, seven came from accountancy-related participants and 31 came from preparer participants.

The accountancy-related letters mirror the overall results in that all but the Activity DICTION master variable are significantly different between the two deliberations. Table 2 below reports the mean values, F-statistic, and p-value for each of the master variables for the accountancy-related interest group.

Master Variable		**Mean**	**F-statistic**	**P-value**
Activity	SOP	50.68		
	GRI	50.44	.305	.588
Optimism	SOP	49.56		
	GRI	53.01	33.695	.000
Certainty	SOP	46.59		
	GRI	74.62	6.984	.038
Realism	SOP	42.71		
	GRI	45.30	16.127	.001

Commonality SOP	52.46		
GRI	49.82	7.832	.012

The master variables Optimism and Commonality will be examined more closely. The greater Optimism that accountancy-related participants express for the GRI relative to the SOP deliberation results solely from higher use of terms indicating Praise (F-statistic = 59.595, p-value = .000). While these participants applaud the idea of sustainability reporting as a general idea, they show no more Satisfaction with the GRI Exposure Draft nor extend it greater respect than the SOP Exposure Draft. An example of this 'Praise that falls short of Satisfaction' comes from a letter submitted by a large, international audit firm. While the mean value of all GRI comment letters by accountancy-related participants on the Praise component of Optimism is 5.13, the Praise score from this participant is 7.58 – indicating a relatively sunny tone.

> We fully support the development of standards for sustainability reporting that would be generally accepted on a global basis, and believe that the GRI is taking an important step forward to that end. However, we are concerned that the 2002 Exposure Draft requires significant betterments (sic) to not only move closer to that goal but to also enable widespread adoption.

This example foreshadows the lower Commonality scores by this participant group which are driven by significantly lower use of language signaling Cooperation. The mean value for all accountancy-related participants on the Cooperation component was 5.84 and this letter was 6.57 – relatively speaking, a Cooperative tone. The last sentence of the above example carries the implication that preparers will not adopt the Guidelines, as proposed. For a voluntary reporting framework like GRI lack of cooperation by preparers would, of course, render the entire effort moot. Continuing with this same letter, the participant goes on to caution the GRI about deficiencies in the Guidelines with respect to assurance providers. This is interesting because assurance – a professional service equivalent to the audit function in financial reporting – is intended to provide users of sustainability reports with an independent opinion as to their fairness and reliability. Large audit firms are interested in pursuing this assurance service as it allows them to broaden their professional sphere of practice by generalizing the logic of financial auditing to other professional domains. This letter continues as follows:

> Further, many of the core indicators lack the characteristics of suitable criteria under the International Standards on Assurance Engagements

> issued by the International Federation of Accountants. Suitable criteria are the backbone to a generally accepted framework.

Taken together these examples suggest that the GRI Guidelines, as proposed, violate the norms operating in the domain of financial reporting. The argument is made that preparers will not produce sustainability reports (as accountancy-related participants speak on their behalf) and assurance providers will not scrutinize them to offer an opinion as to their fairness.

Turning now to preparers speaking for themselves, the GRI is viewed in significantly more Optimistic terms than the SOP. But this interest group shows less substantive agreement on core values and more appetite for maximizing individual choice with respect to the GRI compared to their views on the SOP, as expressed through lower scores on language voicing Centrality and higher scores voicing Liberation. Optimism component scores of significant difference between the two deliberation episodes include higher Praise, Satisfaction and Inspiration terms, and lower Denial terms. Commonality component scores of significant difference between the two deliberation episodes include lower Centrality and higher Liberation scores. An example of a preparer letter follows in order to provide a sense in which these sentiments interweave:

> **The Draft Version of the 2002 GRI Sustainability Reporting Guidelines is not flexible enough and seems to impose a de facto-standard:** The new draft version reads more like a mandatory standard than like a voluntary framework. While we acknowledge that meaningful and credible reporting depends on valid core indicators we strongly oppose the rigorous style in which indicators are put forward by the guidelines, e.g. organizations must explain why they choose to omit an indicator. We do not think that this reflects the still very controversial debate on sustainability indicators. The proposed set of indicators still has to stand the test...It does not encourage our members to report "in accordance" with the guidelines if they have to explain extensively what they are not reporting... We therefore encourage the GRI to further reduce the number of indicators. Flexibility in the use of indicators is vital for any successful reporting guideline.

This excerpt highlights several points of interest to this study. First, it articulates the unsettled status of the object 'sustainability reporting'; the construct is still under negotiation and diverse interest groups use discursive events like the GRI development process as platforms to build a favorable reporting framework, but also more broadly to build an amenable social construct. Second, it supports the assertion by accountancy-related participants that the imprimatur of 'prepared in accordance with the GRI Guidelines' on a sustainability report is desired by preparers. Third, the use of the 'in accordance with' seal of approval is sought in conjunction with a reduced scope of sustainability report. Finally, preparers wish to negotiate the flexibility to individually decide, at their discretion, what and how many performance indicators to include in any given sustainability report; and inability to exercise this discretion may negatively impact the extent to which the GRI framework is adopted by preparers.

FUTURE RESEARCH DIRECTIONS

The work on developing sustainability reporting remains incomplete, although volumes of Corporate Social Responsibility (CSR) reports have been published since the GRI 2002 Guidelines were finalized. And the GRI framework is arguably the most widely adopted framework for their preparation. Substantial work can be undertaken to understand this phenomenon. To what extent do organizations undertake these reporting efforts as a defense against more coercive regulatory regimes; to what extent are organizations responding to perceived normative pressures; to what extent are organizations doing as they see others do? Each of these motivations should leave discursive traces as they are implemented.

Also important to understand is the extent to which CSR reporting represents organizational change; and/or the extent to which it represents an exercise in legitimization. Ample critique arises in accounting research voicing concern that CSR has been appropriated for legitimacy-seeking purposes and remains devoid of substantive stakeholder accountability (e.g., Moneva ea al. 2006, Cooper and Owen 2007). What discursive practices are employed and by what mechanism(s) are they effective toward these ends?

Finally, understanding the emergence of assurance services for CSR reports can be deepened. As accountancy-related firms vie with other consultative professionals for an emerging market for these services, what factors determine who gets the assurance work? How are accountancy-related firms making sustainability reporting auditable?

CONCLUSION

The two deliberation episodes examined in this study explore the rhetorical processes by which existing relations and understandings in an established community of practice present themselves in another developing community of practice. Even though particular participants change between deliberations, institutional identities and roles carry into other domains to attempt the discursive work of regeneration of these roles in a process of metaconversation.

In particular, existing relations found between accountancy-related participants and preparers of financial reports seek to reproduce themselves in a new domain of sustainability reporting. Sustainability reporting, as proposed by the GRI, is a fragile institutional structure under construction. It seeks both to emulate and improve on the stronger institutional structure of financial reporting. Because it lacks the coercive force of financial reporting it relies on the voluntary participation and cooperation of preparers. At the same time it is committed to inclusion of a broader scope of constituents than the financial reporting regime and explicitly solicits user participation. This brings into the negotiation a party largely theoretically constructed in financial reporting.

The findings of the study confirm similarities between accountancy-related participants and preparer participants, and also reveal divergence with users in the rhetorical tone offered in the 2002 GRI Guidelines development project. These findings highlight the careful discursive path that a successful sustainability effort needs to tread, between the preferences of powerful and established interests with no compulsion to produce sustainability reports and the GRI's avowed goal of greater transparency and accountability by some of these same interests.

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The sample sizes are not equal between the participant groups in either the SOP deliberation or the GRI deliberation. This requires a test of 'equality of homogeneity of variances' in order to control for an inadvertent Type 1 Error – concluding the participant groups are different in rhetorical tone when, in fact, there are no differences. The test for homogeneity employed here is the Levene Statistic. For dependent variables that fail the assumption of homogeneity of variance (evidence of this is a significant Levene Statistic) an alternative F-test statistic is utilized. In these cases the Welch test is used as the alternative F-test to provide a test of equality of means that is robust in the presence of heterogeneous variance and unequal sample sizes. Data on which variables utilize the Welch test, and which variables utilize the ANOVA F-test statistic are available from the author. If a significant difference is found in the model as a whole then a post-hoc test is performed to determine which of the group means differ. For models with homogeneous variance this test is Tukey's, and for those models with unequal variance the test is Games-Howell.