Date: May 17, 2021

Subject: Report of Public Comments Recieved on
the Draft (version 1) Responsible Sport Standard for Organizations

About the Public Comment Process:
The Council for Responsible Sport (Council) invited public comments on the draft Responsible Sport Standard for Organizations (version 1) February 24 through April 10, 2021. The intended audience for the new Responsible Sport Standard for Organizations is event professionals, but public comment was open to all interested parties and individuals.

The Council promoted commenting on the draft standard via its website (www.councilforresponsiblesport.org/sport-organizations), a press release on February 24, 2021, on its social media channels (LinkedIn, Facebook, Instagram), and via an email to its distribution list also on February 24, 2021.

In those announcements, the Council said it would publish a document on its website of all comments received and provide information as to how the comments affected the draft standard. This is that document. Comments were recorded anonymously.

There were no specific 'rules' or prompts for providing public comment, other than to invite interested parties to voice their views and to share information they believe could help make the standard more relevant, credible and/or complete for organizations seeking to implement responsible event production practices and general operating procedures.

About the Responsible Sport Standard for Organizations:

As a standard-setting organization, the Council for Responsible Sport is driven by a vision of a world where responsibly produced sporting events are the norm. We recognize the influence events have on millions of participants and visitors' lived experiences. Such power carries great responsibility.

The Council for Responsible Sport has developed a relevant measurement and reporting framework for the sports event sector. The first-ever Responsible Sport Standard for Organizations (version 1) is a collection of standards of good practice that have been thoroughly reviewed and revised through a robust process of stakeholder input and feedback.

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The new standard is based on the recognition of the following core principles:

Power of Sport - Sport is a diverse, global, culturally influential platform that can engage and inspire people at nearly all scales and in any place on Earth.

Resolving Climate Change - There is an urgent need to balance (reduce) atmospheric carbon in the coming decade in order to secure the biosphere's ability to regulate Earth's climate, while mitigating the harmful effects of humans' consumptive activities and largest-in-history global population.

Enabling Social Justice - Sport platforms that work to reduce inequities along racial and socio-economic lines enable progress towards a more fair and inclusive society.

Business of Sport - Organizations must find and employ viable and ethical economic models upon which they can attempt to operate indefinitely in the marketplace.

The draft criteria maintains the Council's traditional five-category structure of its single event standards, including: Planning & Communications, Procurement, Resource Management, Access & Equity, and Community Legacy, and are ordered thus also herein to report all comments received, with the addition of an 'overview' summarizing the volume and other characteristics of comments received.

The Five Pillars of Responsible Sport

Planning & Communications   **Procurement**   **Resource Management**   **Access & Equity**   **Community Legacy**

Overview:

Viewed	Started	Completed	Completion Rate	Drop Outs (After Starting)	Average Time to Complete
494	35	6	17%	29	14 minutes

Section 1: Planning & Communications

- Commitments - comprehensive planning - audience engagement - governance - health & safety - biodiversity

Item #	Comment Received	Council Action or Response (where applicable, blank = no change)
1.5	Is it 'SBT' the formal standard? Or simple targets that are based on science? Why SBT? What about other corporate responsibility/ESG frameworks?	'Proposed addition accepted and made. What and Why' and 'Reporting Guidance' sections have been updated for clarity about the importance of science-based targets, and reference to extended guidance has been associated with the item.
2.2	In addition to offering plan for physical accessibility offerings, I recommend mental accessibility options/ places of respite, etc. as well	Proposed addition accepted and made. 'What and Why' section revised to include mental accessibility; "An access policy intends to ensure that event organizers have considered the needs of populations with a wide range of sensory, ambulatory and mental capacities and/or circumstances be they participants, volunteers or spectators"
2.4	Asking that the plan addresses direct energy as well as direct and indirect GHG seems a bit duplicitous. Also, could 'materials' or 'procurement' be added to this list?	"Supply chain considerations" added to the list to include procurement related elements. Distinction between energy and GHG emissions is retained so that the latter can include emissions from sources outside of energe use (e.g. supply chain/ embedded emissions)
2.4	Include "staff AND volunteer training" under "what and why"	Proposed addition accepted and made.
3.1	It's unclear if Plan for 3.1 is the same or different than the plan described above.	Distinctions clarified in 'what and why' section.
3.2	Can race/ethnicity be included in this disclosure as well?	This indicator intends to address the gender element, specifically, regardless of race/ethnicity
3.4	Could they also disclose investments of leadership/ ownership?	Financial investments by leadership vary widely across the sport sector, and are beyond the scope of this standard

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4.1	Could that be on the Community Development page? That seems like where they usually hide it. Recommend saying what title of page should/ could be called - I feel like this section is missing a 'Resiliency Plan' requirement. It would be awesome if stadiums were 'reapproved' to be things like: Disease testing locations, vaccine clinics, shelters after storms, etc. It would also be helpful to have a Resiliency plan to adapt to climate crises. Maybe this is in the Operations section, but I think part of it needs to be included in 'Planning'	Organizations can earn credit for having shared a robust sustainability or responsibility report on its website, or reported on no less than 5 key performance indicators on one easy-to-find web page, and/or for including policies, plans or statements from top leadership regarding social and environmental responsibility. The latter is where 'resiliency' plans would be recognized.
5.1	Include volunteers under "what and why"	Proposed addition accepted and made
5.2	Include training plan for child protection policy under "what and why"	Proposed addition accepted and made
5.2	Develop and implement a child protection policy as part of safety and security planning: The comments are too broad: There needs to be a culture of safety which includes the following: leadership is committed and vocal, standards are clear and enforced. All parties understand that safety is part of their job, takes warning signs seriously, and understands who to report to. There needs to be annual training on abuse prevention, as well as a written crisis plan in the event of an incident or false allegation. The written abuse prevention plan needs to be reviewed and updated annually. Ally employees and volunteers must be interviewed and referenced checked, which includes full criminal background checks. Board of Directors (if applicable) also must be involved with this.	These are useful activities in the implementation of a child protection policy. The Council will refer to deeper sources of information and guidance in the 'resources' section of this item, which is made accessible to all organizations enrolled to report against or according to the standards.
6.3	Is there opportunity in section 6 to not only mitigate and repot biodiversity impacts, but also full removal of impacts and/or remediation of impacts? It seems to me that we're past the point of reporting and need to be moving into action.	The Council will recognize "demonstrated actions taken within the reporting period to restore or improve biodiversity to sites used by the organization" (6.2 scoring detail)

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9.1	Could this include saving for reuse?	Yes, it does. Clarification made.
7	May benefit from not only having a plan, but having a set of commitments/goals related to supply chain.	It is expected that the written plan "explains the full set of criteria to be considered when making purchases on behalf of the organization" (7.1 'what and why' section)
8.2	Is 8.2 related to Scope 3 Emissions? This one is a bit unclear and I think it sounds intimidating... Getting clearer about 'measured impacts' and really what that means... For example, is purchasing the same product, but from 100 miles away instead of 300 miles away count? Or does the embodied carbon of the actual product need to be reduced?	Yes, most supply chain elements (purchased goods and services) fall under Scope 3 under commonly accepted GHG reporting frameworks. Guidance refers to specific publicly-available tools to assist calculating the GHG savings of specific products and/or changes (e.g. reduction of the quantity of large-format printing from the previous year). "(1) documentation (e.g. table or spreadsheet) demonstrating clear math of the baseline scenario and the changed/improved scenario and the GHG impacts of the stated goods or services. (2) (a) screen shots of results from a professional GHG impact calculator (e.g. the '2030 Product Carbon Footprint Calculator' by Doconomy or the OpenLCA. org tool) showing both scenarios, and; (b) math demonstrating the quantity of avoided GHG resulting from the change" (8.2 'Reporting Guidance')
8.4	Do they have to be Certified by the locality? Do they have to be local? Can you get more points if they're local? How do you prove it?	No certification by a locality or municipality is necessary. Documentation shall simply demonstrate that the contracted business headquarters address or locally-owned franchise location of the business is in the same city as where the good or service is being used for events hosted by the reporting organization.
8.6	Will CRS decide what a legit certification is? Could you provide a short list? (B Corp, FSC, etc...)	"Individual products with sustainability credentials do not apply. Qualifying certifications, ratings and credentials include: B Corporation Certified, Sustainable Green Printing Partnership, being a 1% for the Planet member, being a 2% for Conservation business member, being on the Corporate Knights 'Green 100' list within the past 5 years, businesses whose headquarters or relevant properties have earned LEED, Well Building Standard, BREEAM, Green Globes, or Global Sustainable Tourism Council certifications or ratings. Other notable third-party verified certifications or ratings shall be considered on a case-by-case basis as judged by the project verifier." (8.6 'Reporting Guidance')
8.7	Is there some way to have a goal to reduce paper use in the first place before putting this measure in place?	Item #9.3 directly addresses the reduction of paper use. "Reduce deforestation and waste by seeking to eliminate the use of printed materials in office functions, the event registration process and ongoing communications with participants and staff/ volunteers." (9.3 'What and Why')

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8.8	Do you hope to get specific on this? How do you drive real impact here? I could picture them putting in a fluffy sentence like "when possible, please try to be sustainable..." which may meet CRS criteria, but obviously does not drive real change	Evidence must demonstrate the inclusion of the specific language used in the request for proposal or other formal procurement inquiry. Qualifying certifications, ratings and credentials to be mentioned as preferences include: organically grown/certified organic, locally grown (100 miles or less from consumption location), sourced from farms that are certified biodynamic, Fair Trade Certified, non GMO Certified, direct-from-small family farm(s), regionally in-season ingredients, sustainably sourced seafood, plant-forward menus, vegan options (vegetarian options are expected). Other language indicating preference for recognized means of reducing the environmental impacts of agriculture and food production shall be considered on a case-by-case basis as judged by the project verifier. (Reporting Guidance 8.8) and, from (Scoring Detail) "Event menus and offerings: clearly demonstrate some commitment to more sustainable production techniques at a majority of events within the reporting scope; clearly demonstrate a strong commitment (e.g. <50% organic produce, all grass-fed dairy, etc.) to more sustainable production techniques at a majority of events within the reporting scope; Event menus and/or menu cards visibly highlight sustainable production techniques or product features"
8.9	'Less harm' is very vague... Can you call out plant-based or no trans-fats or low sugar or no dairy?	"Food/beverage/hospitality/catering/concessions feature menu items that were produced according to agriculture-sector criteria designed to minimize ecological and climatic harm, including: organically grown/certified organic, locally grown (100 miles or less from consumption location), sourced from farms that are certified biodynamic, Fair Trade Certified, non GMO Certified, direct-from-family farm(s), regionally in-season ingredients, sustainably sourced seafood, dairy products from pastured animals, plant-forward menus, vegan options (vegetarian options are expected). Evidence must include documentation provided by the contracted company/caterer delivering hospitality services demonstrating alignment with the criteria. Other ratings, certifications or appeals for credit shall be considered on a case-by-case basis as judged by the project verifier."(Reporting Guidance 8.9)
9	Can #9 have a requirement about waste reduction strategies in F&B contracts?	"contracts" added to 9.5 Description. Revised/current version says: "Employ food waste and general waste reduction tactics in hospitality contracts, areas and concessions outlets"

Section 3: Resource Management

- GHG emissions measurement, and mitigation
- waste management -transportation planning -water use and conservation

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10.1	"Request" or "obtain"? - Recommend some overall Resource Management standards at the top... Maybe something related to a central dashboard? - Include language to make sure that upper management has access to - or must look at central dashboard - Recommend including that goals to achieve these are integrated into individual's professional performance goals	"request" revised to "obtain"
11	How do you plan to check their work?	Project verifiers will see if: a) Emissions factor sources are cited and from a recognized greenhouse gas calculation framework or protocol, and; b) that the sub-totals and cumulative totals measured in indicator 10 were used consisitently to perform the final GHG calculations.
12	Can Section 12 have a point about sea level rise/ flooding? - What about resiliency against blackouts? - What about weatherization? - This whole section is great, but I don't see a lot about reduction... Just about measurement. While measurement is great, holding them accountable for reducing year-over-year or with % goals that are tied to the first section about Plans that are endorsed by leadership is so important to incentivize action.	Item 12.2 addresses measured reduction year-over-year: "Demonstrate a GHG reduction from a change in operations, compared to a baseline or the previous year" this may include emissions reductions from any operational change such as adjusted waste management, subsitute goods and services, venue energy efficiency measures and/ or upgrades, etc.

Section 4: Access & Equity

**- Physical accessibility - community representation
- racial, cultural and socio-economic inclusion - introduction to the sport**

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	Overall, this section does not feel inclusive and does not highlight/differentiate 'disabled' to other types of inclusionary needs. I recommend using more specific language so that someone who is "disabled" doesn't read it and feel like they've just been lumped into the "not normal" category. If you're going to have a section on Equity and Inclusivity, it needs to be comprehensive of things other than physical ability and race. What about age, socioeconomic status, mental health/ability, gender, etc. It would be helpful for this to also be about staff in addition to the fans/selling tickets aspect.	16.4 invites organizations to "Provide accommodations for attendees and/or participants with a wide range of sensory, ambulatory, and developmental capabilities" and awards points for "unique initiatives or accessibility services to directly include people with disabilities and/or improve the ease and experience for attendees and/or participants with a wide range of sensory, ambulatory, and developmental capabilities at events during the reporting period." 17.1 clarifies that 'Underrepresented groups' typically refers to demographics such as race, ethnicity, nationality, age, household income, and primary language.
16.4	Please highlight 'physical disabilities'	Suggested change accepted. Revision made.
16.5	Addresses some conditions, but still implies a 'disability' instead of inclusivity to various mental health conditions as well. Strongly encourage a point about providing places of respite and other mental health support.	16.4 acknowledges efforts to "Provide accommodations for attendees and/or participants with a wide range of sensory, ambulatory, and developmental capabilities"
16.6	I think this needs to be stronger - I recommend having ambassadors to help different types of able bodied/minded fans, just like teams have people that are bilingual. - What about hiring staff of differing abilities?	Item 3.1 addresses hiring practices, in which the diversity, equity and inclusion plan "should include the organization's internal approaches to diversification, equity, and belonging with regards to human resources, hiring, governance, etc."
17	Be more specific that 'underrepresentation' is about race... Or include people with physical disabilities, for example, in a group that may be underrepresented. If 17 is mostly about race, just say so. The academic references in 17 are a bit unclear. What happens when "barriers" are simply that tickets are too expensive?	Underrepresentation varies widely across indicators of representation and geographies. Language is intentionally broad in order to include a wide range of possibilities. 17.1 "Actions to host more diverse and inclusive events will necessarily include local demographic research and direct inquiry with representatives of various groups suspected or known to be underrepresented at the organizations' events.'Underrepresented groups' typically refers to demographics such as race, ethnicity, nationality, age, household income, and primary language." (What and Why)
17.2	Would ticket discounts qualify under 17.2 or are you looking for things like promotional events to celebrate a particular culture, for example?	Yes, registration/ticket discounts can earn credit on item 17.2, as can providing round-trip transit free of charge to groups deemed 'underrepresented'
	What happens when the 'barriers' are actually concerns about COVID? Should concerns over health/safety be included? There may be a hugely underrepresented fan base of people that are hesitant or have public health concerns/risks. There could be a communications aspect to this section to highlight the various opportunities for inclusivity and to normalize many different types of physical and mental abilities.	Event attendance is always optional. Before, during and after the COVID-19 Pandemic, individuals have always and will continue to self-select their own acceptable levels of risk assumption when determining whether to attend and or participate in activities and events.

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20	Do you hold #20 to any level of standards for donation? - What about ability for community to use venue for other uses?	20.1 (Scoring Detail) Proven donations were made to support local communities in any amount (1 point); Sum in currency or estimated value in currency of donations during the reporting period exceeds 1% of total net profit for the applicant organization (3 points, plus 1 excellence point for each one percent increment increase thereafter, up to 10); OR; the event-hosting organization is itself an active, grant-making foundation in good legal standing with a proven history of giving within the past 18-months (10 excellence points); OR; At least one event in the reporting period was a fundraiser, with at least 50% of proceeds after expenses sent to charity or community group partners (3 points) (max=7, plus up to 10 excellence points.

Conclusion:

As a standard-setting organization, the Council for Responsible Sport is driven by a vision of a world where responsibly produced sporting events are the norm. We recognize the influence events have on millions of participants and visitors' lived experiences, and we also acknowledge that no standards collection is perfect. Through the process of collecting stakeholder feedback, stories, case studies, examples, and input on the circumstances of their work to become more socially and environmentally responsible, we've learned that those efforts take shape in myriad ways. We intend for the standards collection to recognize good practices, and we also acknowledge that there are tactics and practices that constitute good practice that are not included in the first version of the Responsible Sport Standards for Organizations. It is our intention to welcome and accept feedback continuously, and to update the collection of standards at the intervals deemed necessary by the Council for Responsible Sport Board of Directors to retain its relevance and applicability over time.

Reviewed and Authorized by:

Shelley Villalobos, Managing Director
Council for Responsible Sport
on 5/14/2021