

Is sustainability reporting becoming institutionalised? The role of an issues-based field

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This study was approved by the Deakin University Human Ethics Committee and Monash University Human Ethics Committee and have therefore been performed in accordance with the ethical standards laid down in the 1964 Declaration of Helsinki.

Is sustainability reporting becoming institutionalised? The role of an issues-based field

Abstract

We study companies that do not produce a sustainability report in contexts where institutionalisation is assumed. Based on a careful analysis of interaction patterns between non-reporting companies, sustainability interest groups, and peer organisations we find patterns of discursive and material isomorphism that suggest sustainability reporting is confined to an issues-based field, rather than spreading as an institutionalised practice across the business community. We argue that the issues-based field exerts only weak pressure for sustainability reporting, and that encouraging more firms to report rests on understanding what influences companies to interact more widely to become part of this field.

In this paper we seek to develop institutional explanations of sustainability reporting, building on observations that institutionalisation is underway and is shaping reporting activity (Barkemeyer, Preuss, & Lee, 2015; de Villiers & Alexander, 2014; de Villiers, Low, & Samkin, 2014; Gürtürk & Hahn, Forthcoming). However, we refine these observations by investigating the institutional field(s) that deem reporting necessary, and the institutional pressure influencing its practice. We focus on non-reporting firms because, as Choudhury (1988) explains, “the absence of accounting (sic) may tell researchers a lot about the nature of accounting (sic) and its existence” (p. 550). Non-reporters provide a contrast to reporting firms and isolate influences on reporting that are difficult to detect when reporting occurs.

This study is important because sustainability reporting is seen as a way for companies to meet their social and ethical responsibilities toward the environment and the communities in which they operate (Bebbington, 2001; Owen, 2008). However, new insights are needed to encourage more companies to report in ways that lead to meaningful change (Milne & Gray, 2007). As we explain below, while

1 institutional theory offers a new explanation for reporting patterns, studies to date have involved only
2 a basic application of institutional theory, often invoking industry or national level indicators in their
3 analyses or relying on indicators such as common professional qualifications to assert explanations for
4 commonality of practice (Aerts, Cormier, & Magnan, 2006; Barkemeyer et al., 2015; de Villiers &
5 Alexander, 2014). A related and recent exception, however, is O'Sullivan and O'Dwyer (2015) who
6 invoke the work of Hoffman (1999) to study the role of an issues based field in the penetration of
7 sustainable finance practices in the international banking industry. Overall, refinements are necessary
8 to fully appreciate the contribution institutional theory can make to understanding sustainability
9 reporting behaviour.
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22 The motivation for this study rests on changing patterns of sustainability reporting, and the
23 concomitant developments in theorising about this practice [see note one]. Reporting patterns have
24 changed substantially over the past few years, but theorising has not kept pace. Early reporters in the
25 1980s and early 1990s were mostly large, listed firms, subject to social pressure for which reporting
26 was convincingly explained by legitimacy drivers (Deegan, 2002; Deegan, Rankin, & Tobin, 2002;
27 Deegan, Rankin, & Voght, 2000; Lindblom, 1993). The profile of reporters has now changed, such
28 that legitimacy is likely to be only one explanation for reporting (Morhardt, 2010). Since the mid to
29 late 1990s sustainability reporting has spread to a wide variety of different companies, with smaller,
30 less-intensive, service-based and less visible companies making up recent growth (Higgins, Milne, &
31 van Gramberg, 2015). One explanation for changing reporting patterns has been a widening of the
32 business case, beyond legitimacy, to include other benefits of reporting. These include: marketing,
33 improving competitive position; social, warding off stakeholder challenges; political, reducing
34 political pressure and regulation; and accountability where the company is playing its part in
35 sustainability outcomes (Solomon & Lewis, 2002).
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55 Another explanation draws on institutional theory (Higgins & Larrinaga, 2014; Larrinaga, 2007).

56 Institutional theorists suggest that sustainability reporting, rather than being purposefully initiated to
57 achieve specific business case outcomes, occurs because managers acquiesce to social pressure that
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1 renders it 'required', 'expected', or 'normal' in the contexts in which they operate (DiMaggio &
2 Powell, 1991). The context in which managers operate is understood in terms of the 'field'. Fields
3 include groups and individuals that interact and, by so doing, collectively shape norms and
4 expectations within that context. Within the institutional literature 'fields' are sometimes considered
5 analogous to 'industry', but they may also form in geographical locations, and shape the activities
6 expected in those specific communities. They might also be issues-based, for example, the
7 environment, or occupational health and safety, where those affected collectively define and shape
8 appropriate responses to the issues. Fields can also form around strategies, where organisations
9 positioning themselves similarly, for example, on the basis of quality or sustainability, adopt the same
10 practices such as quality circles or sustainability committees.
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24 What becomes institutionalised, or seen as 'necessary', is not negotiated in a structured way between
25 field members, but results from subtle interactions and 'jockeying' between them (Hardy & Maguire,
26 2010; Lounsbury, Ventresca, & Hirsch, 2003; Phillips, Lawrence, & Hardy, 2004). Institutional
27 pressures that develop take a variety of forms. Sometimes "the influence of the institutional
28 environment can be subtle, working its way in to the organization through rationalized myths, or
29 directly, coming as an indictment on a felony charge" (Galaskiewicz, 1991, p. 293). Thus institutional
30 pressures can be regulatory, normative or cognitive (Scott, 1995). Regulatory institutional pressures
31 such as rules, regulations, or conditions of membership, exert coercive pressure and influence the
32 adoption of practices because of the potential for reward or threat of punishment (DiMaggio &
33 Powell, 1983). Normative institutional pressures rest on social consensus within a field about the
34 'right thing to do' (Scott, 1995, p. 51). Cognitive institutional pressures are the most subtle and
35 influence organisational action because norms and behaviours become taken for granted, such that
36 alternative ways of thinking and acting are not even consciously considered. Managers act because it
37 is 'normal' to do so. The point is that organisational activities, such as sustainability reporting, are not
38 deliberately conceived by managers, but are responses to field-level expectations built up over time
39 through interactions in a field. Managers may not always be aware that their actions are institutionally
40 shaped, but isomorphism ensues (Friedland & Alford, 1991; Milne & Patten, 2002).
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2 Recent studies show that sustainability reporting is becoming institutionalised in a size-based global
3 field (Kolk, 2011), a few geographically-based regional/national fields, some industry-based fields,
4 and in a strategy-based field (Kolk, 2011; Chen & Bouvain, 2009; Golob & Bartlett, 2007; Kolk,
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6 2005, 2010a; Young & Marais, 2012; Herremans, Herschovis, & Bertels, 2008; Bebbington, Higgins,
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8 & Frame, 2009). The wider sustainability literature, which is increasingly taking an institutional
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10 perspective, suggests that ‘corporate greening’ may be related to the emergence of an ‘issues-based’
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12 field, so a similar field may shape sustainability reporting (Hoffman, 1999; Hoffman & Ocasio, 2001).
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14 In each field various pressures have been observed, for example, in Australia where cultural norms
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16 shape reporting activity, in contrast to Canada where reporting is influenced by normative
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18 expectations generated by professional associations (Herremans, Herschovis, & Bertels, 2008).
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27 Taken at face value, the spread of sustainability reporting is attributable to institutionalisation in
28 multiple fields. However, fields have tended to be assumed from reporting similarities, rather than
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30 being identified through analysis of interaction patterns. Reporting has also been seen as acquiescence
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32 to institutional pressure, which fails to account for variations within fields. As we show, institutional
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34 theory offers new and plausible explanations for reporting. It also potentially provides new
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36 opportunities for improving reporting, but more attention needs to be afforded to institutional fields
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38 and institutional pressures.
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44 Our aim in this paper is to refine institutional accounts of sustainability reporting. We sought an
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46 approach that builds on existing studies but also enables us to focus specifically on institutional
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48 influences. We identified 23 Australian companies that *do not* undertake sustainability reporting, and
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50 we undertook in-depth, semi-structured interviews with the managers of these firms. These companies
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52 share organisational and strategic characteristics and all operate in fields where existing studies
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54 suggest reporting is becoming institutionalised. Our objective is to shed light on the influence of a
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56 field(s), and the pressures therein. The specific questions explored in this study are:
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- 60 1. Is sustainability reporting spreading to multiple institutional fields?
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2. What type of institutional pressure compels managers to report?

In summary, our findings suggest that sustainability reporting is not spreading to multiple institutional fields, but that it is a normal and acceptable part of a relatively contained issues-based field built around a ‘middle ground’ discourse of sustainability. Within this field it is sustainability rather than sustainability reporting that is institutionalised, and thus the pressure to report is relatively weak. Firms may or may not report because pressure is for ‘action’ and ‘responsiveness’, but not for reporting specifically. The main contribution of this study is to re-orient institutional attention away from how sustainability reporting is spreading to offering a more focused analysis of the role of a specific field and how it interacts with other fields in shaping and influencing sustainability reporting practice.

Next, we outline how institutional theory assists in explaining recent reporting patterns, and how it can drive change in reporting practice. We explain the issues associated with field definition and institutional pressures that must be addressed in order to realise the change potential of institutional theory. We then explain why non-reporting firms offer a valuable perspective, and we outline our sample selection, including how we identified non-reporting firms. A detailed results section follows, before we offer a concluding discussion that ties our argument together and points to areas for further research.

Background and Literature Review

Sustainability reporting is largely seen as desirable (Andersen, 2003; Douglas, 2007). It is viewed as a proxy for a company’s engagement with sustainability, it reflects management commitment to improving social and environmental performance, and it has been seen as a way to bring about change in company behaviour ((Bebbington, 1997). To this end, the motivation to understand and theorise company reporting has been, in part, to uncover what might encourage others to report (Adams, 2002).

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2 Some attribute reporting to organisational characteristics including company size, financial success,
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4 ‘visionary’ founders/chief executives, and an active strategic posture towards sustainability (Adams,
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6 2002; Fifka, 2011). If organisational characteristics that drive reporting can be identified, it may be
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8 possible to predict and encourage reporting behaviour (see Adams, 2002). Others attribute reporting to
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10 motivations and incentives. As explained previously, these include market, social, political and
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12 accountability benefits and suggest that sustainability reporting is attributed to the achievement of a
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14 number of outcomes (Solomon & Lewis, 2002). While some firms are motivated to, for example,
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16 influence powerful stakeholders, others seek a symbol of their competitive differentiation as a
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18 ‘responsible’ or ‘sustainable’ organisation (Bebbington, Higgins, & Frame, 2009).
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24 Our interest is in institutional explanations of sustainability reporting. Over the past few years,
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26 institutional theory has offered new insights in to the adoption of sustainability-related business
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28 practices, including how and why they differ within and between countries and contexts (Boxenbaum,
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30 2006). It has started to inform trends about the uptake of sustainability reporting. As explained,
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32 institutional theory downplays deliberate management action tied to individual organisational
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34 circumstances, and suggests that what managers do rests on norms and expectations in the fields in
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36 which they operate. Companies do similar things and provide similar rationales for their actions
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38 because they seek to ‘fit in’ with social expectations.
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44 Recent studies of sustainability reporting show traces of institutionalisation. While reporting is
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46 spreading it is doing so in clusters rather than consistently across the business community (Chen &
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48 Bouvain, 2009; Young & Marais, 2012). These clusters include large global companies (the G250).
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50 The triennial surveys of corporate responsibility reporting by KPMG show, for example, that in 2011
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52 95% of the G250 firms undertook sustainability reporting, up from 79% in 2008 and 50% in 2005
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54 (KPMG, 2005, 2008, 2011). These firms all report in similar ways, suggesting a global sustainability
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56 reporting field is plausible (Kolk, 2011). Similar observations are made regarding MNCs adoption of
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58 other environmental initiatives, in which the largest global companies adopt “a global, cosmopolitan
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1 orientation that is not tied to any national identity” (Kostova & Zaheer, 1999, p. 73). Other clusters of
2 reporting are apparent in some countries and regions rather than others, suggesting the
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4 institutionalisation of reporting is geographically-based (Chen & Bouvain, 2009; Golob & Bartlett,
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6 2007; Kolk, 2005, 2010a; Kolk, Walhain, & van de Wateringen, 2001; Young & Marais, 2012). There
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8 may also be institutional pressures within industry-based fields, accounting for why reporting is more
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10 common in some industries than others (Herremans et al., 2008). Other clusters are observable
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12 amongst firms pursuing a ‘green’ or ‘values’ form of strategic differentiation pointing to the
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14 presence of a strategy-based field and the institutionalisation of reporting within it (Bebbington et al.,
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16 2009). Certainly, this has been observed in other studies of why firms ‘go green’ (Bansal & Roth,
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18 2000).
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24 Institutionalisation explains why some firms do not report when their characteristics suggest they
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26 would. The large firms that do not report and the non-reporting firms that face similar legitimacy
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28 challenges to reporting companies may not operate in a field where reporting is expected (Martin &
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30 Hadley, 2008; Milne & Gray, 2007; Stubbs, Higgins, & Milne, 2013; Herremans et al., 2008; Quaak,
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32 Aalbers, & Goedee, 2007). Institutional theory also sheds light on why some firms *do report*, when
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34 there is little reason to do so. Small, low-impact, less visible, and service-based reporting companies
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36 that do not face legitimacy challenges and are not seeking business-case outcomes tend to operate in
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38 fields where reporting is seen as essential. Institutional pressure compels them to act (Higgins et al.,
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40 2015).
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46 Clarity is needed, however, about the exact nature of institutional field(s) in which reporting is
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48 deemed legitimate and necessary. If firms report because they’re part of a field or, conversely, they do
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50 not because they are not part of a field, we need a clearer picture of those fields. Field definition is
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52 problematic, and it has received only scant attention in reporting studies (Hoffman, 2001; Meyer &
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54 Scott, 1992; White, 1992). Those that make up fields, typically including business organisations,
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56 regulators, interest groups, trade associations, professional bodies, social influencers, for example, the
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58 media, and sometimes institutional investors, professions, and consulting firms are clear about their
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1 institutional fields, but the boundaries around them are less clear. It is often the case that institutional
2 studies assert the boundaries of fields based on similarities in observed practices, rather than studying
3 interactions that demonstrate their existence.
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8 In his early work, DiMaggio (1991) described fields as being groups and individuals that “collectively
9 constitute a recognised area of institutional life” (p. 148). Scott (1995) suggested that they are made
10 up of diverse groups that “partake of a common meaning system and whose participants interact more
11 frequently and fatefully with one another than with actors outside the field” (Scott, 1995, p. 56). The
12 implications for institutional analysis is that fields cannot be determined *a priori* on the basis of
13 similarities *in practice*; they must be analytically detected (Hoffman, 1999). Interactions signal the
14 existence of a field, and fields wield influence because of those interactions. Indeed, as Zeitz, Mittal,
15 and McAuly (1999) suggest, just because something is adopted *en masse* it is not necessarily
16 institutionalised. An organisational field must be detected by “identifying: an increase in the extent of
17 interaction among organizations in the field; the emergence of sharply defined interorganizational
18 structures of domination and patterns of coalition; an increase in the information load with which
19 organizations in a field must contend; and the development of a mutual awareness among participants
20 in a set of organizations that they are involved in a common enterprise” (DiMaggio & Powell, 1983,
21 p. 65).
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42 Whether firms do, or do not, report also relates to the extent and nature of institutional pressure that
43 prevails within fields. This has also been over-simplified in reporting studies, such that the type of
44 pressure *within fields* that gives rise to sustainability reporting is ambiguous. Traditionally,
45 institutional studies assumed simple acquiescence to institutional pressure, but its monolithic nature is
46 overstated and assumptions about acquiescence are simplistic (Barreto & Baden-Fuller, 2006). Some
47 institutional theorists suggest managers can resist or manipulate institutional pressure (Hoffman,
48 2001; Oliver, 1991). They can move between fields and change and re-shape institutional pressure
49 (Lawrence, Suddaby, & Leca, 2011; Maguire, Hardy, & Lawrence, 2004). Some types of, or
50 combinations of, pressures have more influence than others (Barreto & Baden-Fuller, 2006).
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2 While the key tenets of institutional theory are that it is *types of pressures* that form *within fields* that
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4 shape activity, to make sense of reporting from an institutional perspective these two dimensions of
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6 institutionalisation require greater clarity. We consider whether sustainability reporting is, or is
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8 becoming, institutionalised in each field outlined above, or if the field needs to be defined in some
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10 other way. Close attention to field definition enables a sharper perspective on institutional pressure
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12 *within* the field(s) to be considered. Next, we discuss our study design.
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18 **Research Approach and Methods**

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22 To study the field(s) in which sustainability reporting may, or may not, be institutionalised and the
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24 types of pressures that cohere within those fields, we selected a research design that would *isolate*
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26 institutional effects. We sought to do so by observing what is different when reporting is absent,
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28 amongst companies similar to those that do report. By doing so, our sample provides a revealing
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30 contrast to those that are said to be subject to the variety of influences *on* reporting.
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35 To identify non-reporting companies, we defined a reporting company. We were guided by the Global
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37 Reporting Initiative that defines a sustainability report as one that discloses economic, social, and
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39 environmental outcomes and results in the context of the organisation's commitments, strategy, and
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41 management approach [see note two]. Our definition of non-reporting firms is those that *do not* fit this
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43 criteria. We acknowledge that there are differences in the quality and detail reported by companies,
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45 and that this criteria could result in the inclusion of firms that are undertaking some disclosure. Our
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47 study, however, is not about why *individual* companies *do not* report, or the circumstances at the
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49 *individual organisational level* that give rise to variation *between* firms. It is an exploration of the
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51 fields and pressures that shape reporting and the social norms and pressures that encourage
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53 organisations to report.
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1 We acknowledge that the GRI has a number of limitations, including its ability to disguise
2 unsustainable aspects of company operations (Milne & Gray, 2013) and that improvement is needed
3 in how it frames sustainability (Archel, Fernández, & Larrinaga, 2008; Gray & Bebbington, 2007).
4 Nevertheless, GRI has become the default standard for sustainability reporting (del Mar Alonso-
5 Almeida, Llach, & Marimon, 2014). The 2011 KPMG survey, relating to the period of our data
6 collection, reveals that 80% of the G250 companies and, on average, 69% of the N100 companies
7 now align to the GRI standards and these proportions have been growing steadily. Further, the GRI
8 definition forms part of major rankings and assessment activities of sustainability reporting in various
9 countries, including Australia. The GRI forms the basis of the annual survey of sustainability
10 reporting practices of the ASX200 companies undertaken by the Australian Council of
11 Superannuation Investors (Australian Council of Superannuation Investors, 2011).
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26 To generate our sample, we searched the websites of the largest 200 companies, by market
27 capitalisation on the Australian Stock Exchange (ASX200), for those that were not reporting. We did
28 not restrict our selection to only printed, stand-alone reports because we recognise that, as reporting
29 has evolved, firms report sustainability information in a variety of ways (Rolland & Bazzoni, 2009;
30 Tilt, 2008). We focused on whether the information reported conformed to a systematic presentation
31 of sustainability as described above. In July 2011 we found 89 non-reporting firms amongst the top
32 200 companies. This number is consistent with other assessments of Australian reporting patterns
33 undertaken around the same time (Australian Council of Superannuation Investors, 2011; Higgins et
34 al., 2015; KPMG, 2008).
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49 We categorised the non-reporting firms by industry. Then, because our interest is in exploring
50 institutionalisation as revealed from existing studies of reporting trends, we selected firms in fields
51 where institutionalisation is suggested. (Kolk, 2003, 2007, 2008, 2010b) studies suggest
52 institutionalisation is underway amongst large, listed firms, and the latest KPMG survey shows that
53 84% of the top mining companies, 69% of the largest energy companies, and 61% of financial
54 services firms all report, and all show increases from the 2008 report. In the other industries, the
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1 patterns are more variable: 57% of large gambling firms and about 52% of retailers report. The
2 proportion of firms in these industries reporting has been steadily increasing, and between the 2008
3 and 2011 surveys these industries have shown the greatest reporting uptake. Amongst the other non-
4 reporters within the ASX200 there were insufficient cases of non-reporters or reporters to even
5 hypothesise that institutionalisation was occurring, for example, in two pharmaceutical firms where
6 one reported and one did not. We're confident our sample yields a sufficient sweep of non-reporting
7 firms to be meaningful. Our selection produced a list of 44 Australian firms.

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17 We searched the websites of all 44 non-reporting firms for a contact who could discuss the
18 organisation's position on sustainability and reporting. In many cases we contacted the organisation
19 directly to identify the relevant contact. We ended up with a wide cross section of managers who
20 agreed to be interviewed, at the same time encountering a considerable number that refused. Tellingly,
21 some organisations had no one who could answer our questions. The 23 sample firms we studied were
22 spread across Australia, located in Victoria, New South Wales and Western Australia. The
23 respondents, their industry sector, and the positions of the interviewees are detailed in Table One.

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35 *Insert Table One*

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40 Our data collection involved in-depth semi-structured interviews that lasted between 45 and 60
41 minutes. Twenty (20) were completed on the company's premises, and the remaining three were
42 undertaken by telephone. Interviewees were briefed that we were exploring the perspectives of firms
43 that do not receive much attention in the sustainability literature, including studies of sustainability
44 reporting. Our questions sought insights about sustainability in general and reporting in particular.
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46 The questions canvassed the manager's understanding of sustainability, the most pressing social and
47 environmental concerns for the organisation, the focus of stakeholder attention they received, and how
48 sustainability-related matters were organised within the company. Because we were interested in
49 institutionalisation, the nature of fields and institutional pressures, we sought views about connections
50 to groups and individuals that may signal the existence of a field. The interview questions were

1 derived from the sustainability, sustainability reporting, and institutional theory literature. We
2 followed a set of prompts, available on request, but remained open to the direction in which the
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4 interview went.
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8 The interviews were taped, with permission, and transcribed. The first stage of our analysis involved
9 each of us independently reading through the transcripts, in their entirety, to get a feel for whether
10 field-type differences stood out, and if there was a strong reaction to institutional pressure. We gained
11 a clear impression of differences in interactions that our sample firms had with others. Taking heed of
12 Hoffman (1999) and DiMaggio and Powell (1983) about the importance of interactions to field
13 formation, we undertook a close and detailed reading to map the specific interactions that
14 characterised our sample firms. As we explain below, we first looked to see if the differences cohered
15 around industry, size and geography. Guided by Archel, Husillos, and Spence's (2011) study of how
16 CSR has been institutionalised in Spain, we then examined the transcripts for evidence of
17 isomorphism in discursive and material practices associated with the interaction patterns we observed.
18 In an attempt to uncover the way varying discourses, or understandings of sustainability, were playing
19 out we used NVIVO software to code statements that reflected 'weak', 'strong' or 'middle-ground'
20 discourses of sustainability (see Bebbington, 2001; Laine, 2005; Milne, Tregidga, & Walton, 2009
21 and further discussion of these discourses below). We undertook a similar coding exercise to capture
22 the different types of practices and activities undertaken by each firm.
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44 We ultimately found quite different patterns of isomorphism amongst those firms that interacted
45 widely outside their industry compared to those that did not.
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51 The second part of our analysis involved utilising Scott's (1995) specification of 'regulatory',
52 'normative' and 'cognitive' pressure to explore the nature of institutional pressure on reporting. Our
53 intention was to develop a thorough insight in to the field(s) in which sustainability reporting was
54 'present', exactly how discourses shaped it in light of interaction patterns, and the institutional
55 influences on how managers responded to it.
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Results and Analysis

This section is divided into two parts. Firstly, we describe the interaction patterns we observed that signal the existence of different salient institutional fields that influence how our managers understand sustainability, and their awareness and framing of the need for sustainability reporting. Following this, we explore the institutional pressures observable within each to highlight how institutional pressure shapes the reporting decisions in the fields we identify.

Table Two provides a snapshot of each company's interaction patterns.

Insert Table Two

Some patterns are observable:

- Almost all of the mining companies have contained interaction patterns confined to their industry and local geography
- Those companies with extensive interactions that span industries to include sustainability interest groups and other non-competing peer organisations, are larger (within the ASX100)
- Those companies with few inter-industry interactions are located in Western Australia and are smaller (within the ASX100-ASX200 band)

There are, however, exceptions:

- There is a smaller, WA-based mining company (M3) with extensive interactions with sustainability interest groups. The energy company (E3) is similar.
- Two of the other more contained companies are a retailer (R2) and a logistics firm (L1).

While the logistics firm is located in Western Australia, the retailer is NSW-based.

- Some mining companies with fewer interactions are large and two of them (M8 and M10) are ASX100 companies.

Caution thus needs to be exercised in asserting a geographical, West Australian, field in which sustainability reporting is *absent*, and also a size-based field, in which the smaller companies do not experience any pressure to report.

Our interest lies in how interaction patterns shape influences on sustainability reporting, so we explored the implications of the interactions, or lack of, between our sample firms and other non-competing peer organisations, sustainability groups, and also consultants. We studied whether there was any isomorphism amongst those with extensive, inter-industry interaction patterns, and those that were more limited in the interactions they have.

Organisational interactions and field formations

Industry-based Interactions and Contained Industry-Type Field(s)

Eleven of the 23 companies we studied have very limited interactions with sustainability related groups, and other non-competing peer organisations. Nine of these are mining companies, and the other two are a retailer and a logistics firm. In total nearly half our 23 sample companies have no interactions with sustainability-related organisations. In these firms, interactions are limited to industry connections, with some even having limited interactions with local business groups and their peers. One mining company revealed that, while they were a member of various industry groups, they did not engage widely:

It's like conferences, you see the same people presenting. And for us we don't do a lot of presentations, we don't go to a lot of conferences. We're very low key.

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We just believe we've got a job to do and that's [product], we're a [product]

(M8).

Within industry networks that predominated, there was little discussion of sustainability. For the miners, the most common industry body was the Association of Mining and Exploration Companies (AMEC). This organisation makes almost no mention of sustainability on its website and its recent conference focused on lowering regulation and reshaping the Government's indigenous agenda. Lobbying activities centre on repealing the Carbon Tax and the Minerals Resources Rent Tax (MRRT) (AMEC, 2013) [see note three]. Of the companies that did have connections to AMEC, the benefits were perceived as being limited, with several revealing there was no mention of sustainability within this body. The retailer and the logistics firm commented similarly about their interactions with their respective industry associations. The manager of the logistics firm revealed he was unaware of how the company's peers in the industry addressed sustainability.

The relatively tightly contained nature of the industry was compounded by intra-industry movement, particularly between the mining companies [M1, M5, M8, M10] and the regulators:

I have been in the industry my whole life. Initially in government and in a regulatory role, first of in the water side, I was involved in some research and then went to the Environmental Protection Authority or the Department of Environment Protection it was then; it re-badges every couple of years. So I was on the other side of assessing these types of projects and ensuring compliance with the approval conditions, then went to Mineral Sands for seven years and then I was attracted to another iron ore group (M1).

Discussion of sustainability, when probed, was framed according to a 'weak' discourse that reflects a technocentric view of sustainability (Gladwin, Kennelly, & Krause, 1995; Olsen, Lodwick, & Dunlap, 1992). This discourse stands in contrast to 'strong' sustainability and is also different to a 'middle

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ground' discourse that permeates many business organisations (Higgins & Walker, 2012). As shown
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in Table Three, these companies used few discursive references to strategy, stewardship, commitments, values, responsibility, emphasising instead efficiency, compliance, risk and instrumentality.

Insert Table Three

Illustrative of this discourse, is how this mining manager articulated their most pressing sustainability challenges:

The key issues for us are subterranean fauna, so troglodytic fauna; essentially each of these now isolated palaeo channels hosts a different assemblage of troglofauna that have been isolated genetically from the next palaeo channel and the next one.... We looked at the remnants of those and they still have populations of troglofauna of a similar type genius so you can infer that there is enough volume there for a self-sustaining population (M1).

In contrast to values, responsibility and commitments, 'compliance' and 'cost' were emphasised, and were seen as desirable to minimise. One mining manager summed it up thus: "*Yeah, we live in a nanny state and you know there's more and more and more compliance that's coming on-board*" (M5). Typically, the pressures on the company and their obligations coalesced around economic impacts, with responsibility for environmental issues lying with government, or some NGOs. One mining company manager suggested that:

If we were doing the wrong thing I would hope some NGO was brave enough or interested enough to get up and say, 'This isn't good enough.' In Australia it's such a regulated environment; you know you don't get away with what a lot of less developing countries do (M4).

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2 Few had staff employed in a corporate sustainability position; responsibility for environmental issues
3
4 was often subsumed in to a number of different roles. The Procurement Manager of one of the
5
6 retailers detailed his list of responsibilities *“That takes in the areas of compliance, corporate*
7
8 *compliance, legislative compliance, procurement, sustainability, workforce diversity and executive*
9
10 *business analysis”* (R2). A mining manager (M5) had similar responsibilities.
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16 Amongst these companies we also found little connection between operational sustainability issues
17
18 and corporate-level priorities. The corporate-level managers were interested only in the firm being
19
20 ‘compliant’, with little interest in operational details. For example:
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24 *Yeah [the environment manager] is on site so he does a lot of the reporting to the*
25
26 *Department. But I don’t know a lot about that; he takes care of that along with*
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28 *the operations director and the general manager up on site as well so that really*
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30 *is done from site....* (M8).
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36 Similarly, operational managers had little awareness of how the company was run. For example, on
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38 being questioned about whether senior executives ever consider going beyond compliance, one
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40 replied *“not that’s directed to me”* (R2). The operational managers we spoke to had no involvement
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42 in what was included in the annual report. Often, sustainability, and/or environment, were
43
44 ‘outsourced’ to consultants to complete the compliance process.
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50 There was little awareness of pro-active sustainability initiatives, including sustainability strategies,
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52 sustainability committees, standards, policies and benchmarking, amongst this group of firms.

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54 Publicly releasing compliance reports was seen as: *“overkill, it’s really an internal matter; it’s not*
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56 *something that you really... I don’t think that you would share with the general public”* (M5). When
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58 asked about the general view of sustainability within the organisation, and whether any discussion
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60 occurred, a mining manager replied *“Not a great deal”* (M2) as did the retailer (R2).
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2 There was basically no discussion at all relating to sustainability reporting within these firms, and we
3
4 had difficulty articulating exactly what it involved to the majority of these managers we interviewed.
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6 The managers were unfamiliar with reporting-related initiatives, for example, the GRI, and were
7
8 seldom contacted by sustainability consultants. Asked about the GRI, one manager replied:
9
10 *“no...never heard of it...but you can be sure I’m now going to Google it”* (M2). We also asked about
11
12 the Government’s mandatory National Greenhouse and Energy Reporting Scheme (NGERS – see
13
14 note four) to which one replied *“I’m not sure about that. I don’t know, I’m not familiar with it”* (M8).
15
16 Questions relating to the Carbon Disclosure Project were met with similar responses (M1, M8, M10).
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22 The few who were aware of sustainability reporting, had never viewed a sustainability report: *“I can’t*
23
24 *say I’ve seen too many”* (M8) and were baffled about why their peers reported. Few had considered
25
26 expanding the information provided in the annual report. Overall, there was a degree of immaturity
27
28 about reporting and disclosure. In response to our questions about a mention of CSR in one mining
29
30 company’s annual report, the manager replied: *“Yeah, that was the motherhood statement. That was*
31
32 *a compliance...”* (M5).
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38 For these firms with limited extra-industry interactions, the discourse and practices of sustainability
39
40 are shaped by norms and pressures that predominate within the industry. These emphasise
41
42 Government regulation that requires base-line assessments of flora and fauna, engagement with
43
44 indigenous groups, detailed mine rehabilitation plans, and regular consultation with communities.
45
46 Programs are required to manage impacts, and need to be submitted to a Government agency for
47
48 approval. According to the mining managers, the extent of regulation leaves little ‘room’ for other
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50 sustainability activities; they were left pondering what else they would include in a voluntary
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52 sustainability report.
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58 Wide Inter-Industry Interactions and an Issues-Type Field

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1 In contrast, twelve (12) of the non-reporting firms, including two mining companies, had extensive
2 interactions with sustainability-related interest groups, other non-competing business organisations,
3
4 and consultants on a regular basis. Amongst these, we observed distinctively different discursive and
5
6 material practice to the previously discussed companies.
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10 Interactions were common between these companies and the Global Reporting Initiative (GRI) and
11
12 the UN Global Compact. Almost all engaged with professionals associated with the Dow Jones
13
14 Global Sustainability Initiative (DJGSI), and the FTS4GOOD index. Some filed returns to the
15
16 voluntary Carbon Disclosure Project (CDP) and joined industry sustainability initiatives, for example,
17
18 the National Packaging Covenant. Interactions involved attending events, seminars and conferences,
19
20 joining committees and working parties, and providing feedback on discussion papers to industry and
21
22 sustainability bodies [see note five]. The managers of these companies had extensive awareness of
23
24 business/sustainability issues, and the overall value and good business sense that sustainability
25
26 provides:
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32 *Our main competitors are in China and they do it very unsafely and very*
33 *environmentally irresponsibly. So there's a good business reason for us to make*
34 *sure that we produce these rare earths in a safe and environmentally responsible*
35 *way and that is if you think about the Toyotas of the world who are making all*
36 *these hybrid cars, at some point in time, they'll need to be exploring their supply*
37 *chain and someone can ask them the question 'where are you getting your rare*
38 *earths from?' and if they say China; and then you compare China's rare earth*
39 *industry with us, we're going to be a lot cleaner and greener (M6).*
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52 We also found evidence that the interactions between these organisations led to a mutual exchange of
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54 ideas that also influenced company practice. A retailer suggested their involvement with others
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56 enables them to understand the global context, and keep a watching brief on developments,
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1 particularly Integrated Reporting in South Africa. The consumer staples firm describes how
2 engagement with interest groups enables feedback and exposure:
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6 *Packaging covenant, yep, yep. We were an early adopter of the Sustainable*
7 *Packaging Guidelines. So in our sustainability strategy, that fits under our*
8 *products. ... We put all of our action plans through Australian Packaging*
9 *Covenant and Responsible Round Table on Sustainable Palm Oil. Also our CDP*
10 *report's publicly available; it's all there (C1).*
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18 Most noticeably, the companies with extensive interactions shared a 'middle ground' discourse of
19 sustainability (Colby, 1991; Livesey, 2002; Milne et al., 2009). This discourse reflects ecological
20 modernisation, in which sustainability is important and is accommodated through gradual
21 modification of existing systems (Rossi, Brown, & Bass, 2000). As illustrated in Table Four, the
22 emphasis on 'stakeholders', 'engagement', 'commitments', 'integration', and 'leadership' is shared by
23 many of our interviewees (Tregidga & Milne, 2006).
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34 *Insert Table Four*
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39 Stakeholder engagement, an external facing practice, has important influences on internal cultural
40 change and learning, and assists the company to maintain a leadership position:
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45 *With the mix of stakeholders you can get different viewpoints on an issue. So it*
46 *was interesting when I was writing, well interesting to me it might be boring*
47 *everyone else... but when we were writing the policy stuff for the carbon scheme to*
48 *get that (T2).*
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57 Thus, in contrast to the other set of companies we identified, these firms had close connections
58 between external, corporate, and internal issues:
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1
2 *What we need to do is engage the organisation and create systemic change. So*
3
4 *one of the first things that we did after the creation of our environment*
5
6 *sustainability unit was to go to the executive and ask for their endorsement to*
7
8 *create an environment working group and each executive has a representative that*
9
10 *sits on that. We meet monthly (FS2).*

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15 A ‘middle ground’ discourse of sustainability legitimises a range of voluntary, corporate-level
16 sustainability-related practices that emphasise ‘action’, particularly: social, environmental and
17 sustainability audits; senior management responsibility for sustainability; sustainability strategies;
18 sustainability indicators; and Environmental Management Systems and certification (Iraldo, Testa, &
19 Frey, 2009). We found evidence of almost all of these practices across the firms we studied (see table
20 four above). Surprisingly absent, however, was the practice of sustainability reporting. Studies of
21 reporting in Spain, the UK and New Zealand show that sustainability reporting is common to this
22 discourse (Archel et al., 2011; Livesey & Kearins, 2002; Collins, Lawrence, Pavlovich, & Ryan,
23 2007; Milne et al., 2009; O’Dwyer, 2002). Indeed sustainability reporting is seen as a key social
24 practice in how this discourse is produced, reproduced and maintained.

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40 We found that some firms did see sustainability reporting as inevitable (M3), and they were all aware
41 of the GRI, indicating that while they did not report, they were aware of it. Their decision not to
42 report was based on aspects of organisational culture, structural issues inside the company, and
43 overlap with other types of reporting. The financial services firm argued that “*you can’t necessarily*
44 *draw a line between the fact that because companies aren’t doing a song and dance down Pitt Street,*
45 *that there’s nothing on inside the organisation”* (FS1), while the transport company suggested that
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Others suggested they experienced no demand for more information, and a feeling that shareholders and other stakeholders are satisfied with the information provided. One manager commented that: “I can say that I have not heard of or received any enquiries from our shareholder base” (FS2). Another view was that ‘actions speak louder than words’ and it is better to put resources in to actual initiatives:

Personal opinion, what is a sustainability report other than a PR brochure?

Would it not be better to spend your \$100K, \$200K of production money on actual efficiency projects? I’m all for open transparency, which is why we report through CDP, the Dow Jones Sustainability Index and CDP Water for the first time this year. So our information is out there in the public domain but we don’t go to the trouble and expense of putting it in a fancy brochure.... (C1).

Thus there was a feeling that sustainability reporting does not deliver outcomes, and those that did it did so to support their differentiation and branding strategies:

I mean I think there are companies that really put their stamp on it and utilise it as a differentiation tool from their other competitors. But they, I think, have a really long term embedded approach to sustainability. I mean they have, from what I see and read in CSR Reports from various companies, they have embedded sustainability KPI’s into scorecards and a bottom up approach rather than a sort of top down approach and it’s a lot greater emphasis on those areas (G1).

Given the interaction patterns of these firms, and the similarities in how each discusses sustainability and attempts to operationalise it, it seems clear that a field has formed around the broader issue of ‘business and sustainability’. This issues-type field extends beyond individual industries, and spans organisations of different sizes. Regardless of industry, size and geography there exist common understandings about stakeholder groups and their needs and expectations, and a set of common practices about making a contribution to sustainable development.

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2 *Institutional Pressures*
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6 For those firms confined to industry-based interactions, there is no institutional pressure at all.
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8 Sustainability reporting is not any part of the field which dominates their rationality.
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13 For the others, however, with extensive interactions and part of a sustainability-based issues field,
14 sustainability reporting is ‘normal’, but not required or expected. The gambling firm summed up the
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16 general sentiment:
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22 *I think it's evolving and there's some pressure points coming into play, but I don't*
23 *think people view it as, it's not a mandatory thing, if you don't do it then you can*
24 *explain why you don't do it or you can put in more generalist statements...So I*
25 *think there's some traction in that space, but I don't think it's going to be*
26 *mandated...But I think the sort of the key areas that there are pressure on and*
27 *being mandated, like diversity and other sort of environmental stuff becoming*
28 *more prominent...(G1).*
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40 While regulatory pressure for some sustainability issues is present, it is not for sustainability
41 reporting. Respondents identified the carbon tax, and the requirements for NGERs, and suggested
42 regulation would be required before they produce a sustainability report: “Companies will only do
43 what they're told to by the government... the government's energy efficiency opportunity scheme and
44 the NGER reporting on greenhouse gases has driven lots of change” (T2). This type of regulation
45 was, however, seen as unlikely. The feeling was that the Government is more focused on specific
46 environmental outcomes (T2).
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1 Regulatory-type pressure was possible from other stakeholders who could impose sanctions,
2 particularly rating agencies and indexes. There was, however, some doubt about the strength of the
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4 pressure that was exerted:
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9 *Look there are a couple of organisations out there that are asking listed*
10 *companies, and we've been asked as well, and politely declined, to provide or to*
11 *have more environmental reporting in your financial report and have auditors*
12 *conduct an audit of that environmental data etc. We responded by 'that's not our*
13 *priority, our priority is responsible gambling and it's not required by auditors to*
14 *do that sort of work' and so forth (G1).*
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24 Normative-type pressure was similarly present, but nascent, limited in scope, and not directed at
25 sustainability reporting. There was a felt need to respond to shareholders if expectations for increased
26 disclosure did arise, reflecting a mix of their regulatory and normative rights to information. The
27 consumer staples manager was adamant that: *"If they ask for it, we'd provide it. We answer to them so*
28 *we'd have to"* (C1). Another pointed out that: *"If one of our direct investors is saying this isn't good*
29 *enough, we want you to report in the Carbon Disclosure Project or we want you to step up in this*
30 *area, then that's when we respond"* (T1). Few received pressure for information, however, revealing
31 that like the regulators, investors are more interested in *actual* performance:
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44 *Shareholders don't really ask about it. We tell them what we're doing on the*
45 *environment, tell them we want to be, you know reduce our footprint and lowest*
46 *possible environmental impact; they get that, they like that, that's fine, that gives*
47 *them a sense of comfort that we don't ignore it (FS1).*
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54 Some cognitive-type pressure is apparent, particularly in the form of peer-pressure within the field.

55 Some watch their competitors closely, and one revealed that pressure was coming through the
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1 networks of their senior managers. One mining company suggested there was peer-pressure amongst
2 Australia's largest companies:
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6 *Another reason I think just being a publicly listed company in Australia, in the top*
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8 *ASX100, that there's some peer pressure there in terms of what other good mining*
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10 *companies do (M3).*

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14 There is a feeling pressure to report will increase. A Financial Services executive opined that *"I think*
15 *it's here to stay...the trend is towards greater disclosure.... but I think it's going through one of those*
16 *periods where it's again a constantly evolving area"* (FS2). The transport executive suggested: *"I am*
17 *expecting the pressure to continue and potentially to increase, yes. So yeah, we'll see where that goes*
18 *but we're bearing in mind that we might need at some point to step up..."* (T1). The feeling was that
19 the evolution was gradual: *"I don't think there's any, there's no revolutionary sort of step going to*
20 *happen in the near future, I can't see that happening"* (G1). Another transport operator expected it to
21 *"just become a normal part of business and expectation...like safety"* (T2). One felt that they had
22 detected an increasing sophistication in the questions being asked, and the information being sought:
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37 *In the time that I've been here, the number of questions that are arising around*
38 *what organisations like ourselves are doing around ESG in particular, is*
39 *becoming more prevalent in those processes and the sophistication of the*
40 *questions is becoming more granular....* (FS1).
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50 **Discussion**

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52 Our study of non-reporting firms in fields where the institutionalisation of sustainability reporting is
53 thought to be occurring reveals that it is not spreading to multiple fields. Instead, sustainability
54 reporting is confined to a field built around a 'middle ground' discourse of sustainability more
55 generally. Based on DiMaggio & Powell's (1983) assertions that fields should be identified by a
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1 careful analysis of interaction patterns, we see clear patterns of discursive and material isomorphism
2 attributed to the extent to which firms engage with sustainability interest groups, rating agencies,
3 professional associations and business-related not-for-profit organisations.
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8 The sustainability-related issues field we identify attracts diverse firms, but not all firms. Mostly, it
9 would seem to attract those companies that share a commitment to sustainability, improving their
10 social and environmental performance, and recognise the importance or necessity of doing so. Within
11 this field, there is pressure for ‘action’ and ‘responsiveness’, and a number of normal and acceptable
12 practices make up the appropriate response. These include appointing a sustainability manager,
13 forming a sustainability committee, and engaging with stakeholders. Sustainability reporting is part of
14 this suite of ‘normal’ practices, but there is little institutional pressure for this specific practice.
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26 Several of the non-reporting firms we studied, however, have completely different and much more
27 limited interaction patterns. They have almost no interactions with sustainability interest groups,
28 sustainability-oriented business associations, rating agencies and other inter-industry groups. This
29 suggests they clearly sit outside the issues-based sustainability field that influences the others we
30 studied. What prevails for these firms are strong industry-related norms where issues such as
31 sustainability are filtered through prevailing industry-based logic. It is not that sustainability reporting
32 and other sustainability-related practices are avoided; they are not even present as part of the fields
33 that shape sustainability-related thinking. These firms do not avoid or resist institutional pressure to
34 report, they do not experience it.
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49 The interaction patterns and the associated patterns of behaviour we observed suggest that the
50 ‘progressive’ middle ground discourse of sustainability is not ‘spreading’. Based on the patterns we
51 observed, it is difficult to see how it would penetrate strong industry-dominated fields. The economic
52 and techno-scientific rationality is constantly reproduced through the insular interactions and tight
53 recruitment practices within the field. New insights about sustainability are not emerging within this
54 field, and would most likely need to come from an external shock or jolt, or an ‘insider’ having an
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epiphany that encourages them to take a leadership role and bring about change (Garud, Hardy, & Maguire, 2007). These individuals will, however, face a tough job because where pressure has been felt for a more ‘progressive’ sustainability stance from, for example, investors or rating agencies, the dominant rationality towards economics and regulation casts the pressures as unrealistic, fringe or unnecessary. The complete lack of a middle-ground discourse also renders other practices such as sustainability committees, sustainability managers, engagement, strategy and culture invisible and illegitimate.

Within the firms with limited interactions, the large cluster of mining companies is interesting, especially given observations within the literature that the mining companies have been amongst the earliest and most prolific of the sustainability reporters (Raufflet, Barin Cruz, & Bres, 2014; Vintró, Sanmiquel, & Freijo, 2014). Given the number of relatively large mining companies we found in our sample, it does not seem as if they are outliers. Consistent with our argument it would seem that those that *do* report and *do* express the somewhat progressive ‘middle ground’ discourse of sustainability, could well be part of the sustainability-related issues field discussed above.

Conclusion

The issue at the heart of this study is that a number of firms assumed to be likely to report based on their strategic or organisational characteristics do not, and an increasing number of firms that would seem unlikely to benefit from reporting do report (Higgins et al., 2015). Institutional studies have drawn attention to the pressures that arise in size, geographical and industry-based fields to explain these patterns, but this work is under developed. Our aim was to extend the growing institutional work by studying the interaction patterns that non-reporting companies have, in an attempt to develop a clearer picture of the salient field(s) for sustainability reporting activity.

Our analysis reveals that the institutional dynamic associated with sustainability reporting is not necessarily size, industry or geographical based, but issues-based. For those that need to, or desire to, be associated with sustainability the interaction they seek out and initiate leads to isomorphism in

1 discursive and material practice around sustainability. Sustainability is something that has come to
2 affect a wide variety of different types of firms and their need to fit in and adopt normal and
3 acceptable practices is strong. However, this felt need is not the case for all firms. Irrespective of their
4 size, some firms that operate in industries where reporting is common, or even in countries where
5 reporting is seen to be popular, may not report or may not undertake other sustainability practices
6 because they have not yet experienced pressure to address sustainability concerns. When they do, we
7 argue that they will seek out interactions that will place them in a sustainability-related issues-based
8 field. This is a different institutional dynamic than new practices spreading to and becoming
9 institutionalised *with existing fields*. This view sheds new light on the dynamics associated with the
10 institutionalisation of sustainability reporting.
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24 If sustainability reporting is confined to a *particular* field, rather than spreading to *multiple* fields,
25 new research questions emerge. In particular, we need to explore the movement of firms between
26 fields: how and why do companies become part of new, issues-based fields? It could be that the
27 movement of firms between fields rests on the organisational characteristics and strategic motivations
28 that have been found to influence reporting, thus potentially offering an explanation for how these
29 characteristics relate to institutional explanations.
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40 Additionally, further attention can now be given to what encourages some firms to report once they
41 become part of a new field, and why some companies within fields do not report. Clearly, the
42 structuring of the middle-ground discourse plays a role, as does the nature and type of institutional
43 pressure that exists within the field, but this does not account for individual differences between firms
44 *within* fields. This too may be influenced by organisational characteristics or strategic motivations (as
45 per Solomon & Lewis, 2002)(as per Solomon & Lewis, 2002)(as per Solomon & Lewis, 2002)(as per
46 Solomon & Lewis, 2002)(as per Solomon & Lewis, 2002) that explain some reporting activities (as
47 per Adams, 2002).
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1 For those interested in encouraging more companies to undertake sustainability reporting, further
2 attention needs to be given to how other field members, for example, NGOs and sustainability interest
3 groups, can be supported to exert the types of pressures that will bring about reporting activity. In
4 particular, what types of sanctions will support the regulatory pressure of the rating agencies? How
5 can normative pressure that rests on some social consensus about what is right be strengthened? Is
6 there room for regulation of disclosure, in which case what form should this take, and what should be
7 required?
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18 The contribution of our study is that institutional theory offers a valuable lens for understanding
19 sustainability reporting. We also show that inter-institutional dynamics are complex and there are
20 clearly different types of fields with the interactions between them requiring some consideration. New
21 directions in institutional theory that focus on institutional complexity, the hierarchy, relationship, and
22 contest between multiple institutional fields and agency on the part of managers to shape, avoid or
23 resist institutional pressure could be incorporated in to subsequent studies of institutionalisation of
24 sustainability reporting (Zietsma & Lawrence, 2010; Dillard, Rigsby, & Goodman, 2004; Seo &
25 Creed, 2002; Garud et al., 2007).
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2 **Notes**
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- 4 1. In Australia, as elsewhere, there is some ambiguity concerning the terminology used by business
5 organisations when describing their reporting efforts, with ‘Sustainability Reporting,
6 ‘Social/Environmental Reporting’ and sometimes ‘triple bottom line reporting’ all being used. We
7 use the term ‘sustainability reporting’ to capture the general category of reports that companies
8 voluntarily produce to disclose social and environmental performance data, impacts, policies and
9 targets. We also use this term to describe previous voluntary reporting attempts, including social
10 reporting and environmental reporting.
11
12 2. The Global Reporting Initiative suggests that sustainability reports disclose outcomes and results
13 that occur within a reporting period in the context of the organisation’s commitments, strategy,
14 and management approach. It includes a profile of the reporting organisation, a description of the
15 management approach taken to manage social/environmental issues, and a series of relevant
16 performance indicators.
17
18 3. The Carbon Tax was introduced by Australia’s Federal Labor government in 2012. It set a price on
19 carbon emissions, with the view to gradually evolving to a market-based system. The Minerals
20 Resources Rent Tax (MRRT), or ‘Mining Tax’, was introduced by the Federal Government in 2011
21 after much debate and industry lobbying. It was designed to redistribute the ‘super profits’ being
22 made by the most profitable mining companies to other areas of Australian society. Both were
23 repealed in early 2014 by the new conservative government.
24
25 4. The Australian Government requires companies to report under the National Greenhouse and
26 Energy Reporting Scheme (NGERS) if they have operational control of a facility that emits equal
27 to or greater than 25 000 tonnes of CO₂e (tCO₂e) and/or produces equal to or greater than 100
28 terajoules (TJ) of energy and/or consumes equal to or greater than 100 TJ of energy. Reporting is
29 also required if the corporate group emits equal to or greater than 125 000 tCO₂e and/or produces
30 equal to or greater than 500 TJ of energy and/or consumes equal to or greater than 500 TJ of
31 energy. See [http://www.climatechange.gov.au/climate-change/greenhouse-gas-measurement-and-](http://www.climatechange.gov.au/climate-change/greenhouse-gas-measurement-and-reporting/company-emissions-measurement/national)
32 [reporting/company-emissions-measurement/national](http://www.climatechange.gov.au/climate-change/greenhouse-gas-measurement-and-reporting/company-emissions-measurement/national). In addition to this, companies that use more
33 than 0.5 petajoules (PJ) of energy per year are required to participate in the Government’s Energy
34 Efficiency Opportunities program that requires them to identify, evaluate and report publicly on
35 cost effective energy savings opportunities. There are more than 220 corporations, incorporating
36 around 1200 subsidiaries, registered for the Energy Efficiency Opportunities program. See
37 <http://www.ret.gov.au/energy/efficiency/eoo/Pages/default.aspx>
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39 5. These include Net Balance (see <http://www.netbalance.com.au>) and The Australian Centre for
40 Corporate Social Responsibility (ACCSR – see <http://www.accsr.com.au>) which are Australian
41 consultancies that offer services, training and research into various social responsibility and
42 sustainability issues (including sustainability reporting) for (mostly) corporate organisations.
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Sustainability reporting institutionalised?

Table One: Research Positions, Industry and Location

Participant	Industry Sector	ASX Position	Location		Participant's position
C1	Consumer Staples/Retail	ASX200	New Wales	South	Sustainability Manager
E1	Energy	ASX100	Victoria		Investor Relations Manager
E2	Energy	ASX100	New Wales	South	Corporate Sustainability Officer
E3	Energy/Mining	ASX200	West Australia		General Manager, Sustainable Development
FS1	Financial Services	ASX100	New Wales	South	Head of Environment, Social & Governance
FS2	Financial Services	ASX100	Victoria		Head of Environment & Sustainability
G1	Gaming/Gambling	ASX100	Victoria		Company Secretary General Manager – Group Corporate Affairs
L1	Logistics	ASX200	West Australia		General Manager – Health, Safety, Environment and Quality
M1	Mining	ASX200	West Australia		Manager, Environment & Community
M2	Mining	ASX200	West Australia		Principal Environment Advisor Senior Environment Advisor
M3	Mining	ASX200	West Australia		Environment Manager
M4	Mining	ASX200	West Australia		Chairman
M5	Mining	ASX200	West Australia		Company Secretary
M6	Mining	ASX200	West Australia		General Manager – Safety, Health, Environment and Community
M7	Mining	ASX200	West Australia		Vice President – Business Development
M8	Mining	ASX100	West Australia		Company Secretary/CFO
M9	Mining	ASX200	West Australia		Manager – Environment & Community
M10	Mining	ASX100	West Australia		Group Environment Manager
R1	Retail	ASX100	New Wales	South	Environment Manager
R2	Retail	ASX200	New Wales	South	Procurement Manager
R3	Retail	ASX200	Victoria		Sustainability Manager
T1	Transport	ASX100	West Australia		Manager, Strategy & Marketing
T2	Transport	ASX100	New Wales	South	National Manager – Environmental Sustainability Planning

Table Two: Interaction Patterns

Interviewee	Industry	State	Size	Sustainability-related business group	Other (non-competing) peer organisations	Consultants	Industry-association	Role-based group or association	Local geographical based group or association
M3	Mining	WA	ASX200	√		√	√		√
FS1	Financial Services	NSW	ASX100	√	√	√	√		
FS2	Financial Services	VIC	ASX100	√		√			√
R1	Retail	NSW	ASX100	√	√	√	√	√	
C1	Consumer Staples/Retail	NSW	ASX100	√	√	√	√	√	√
T1	Transport	WA	ASX100	√			√		√
T2	Transport	NSW	ASX100	√	√	√	√		
E1	Energy	VIC	ASX100	√	√		√		√
G1	Gambling	VIC	ASX100	√	√	√	√	√	√
E2	Energy	NSW	ASX100	√	√	√	√		√
E3	Energy	WA	ASX200	√	√	√	√	√	√
R3	Retail	VIC	ASX200	√	√	√	√	√	
M6	Mining	WA	ASX200			√	√	√	√
M9	Mining	WA	ASX200				√		
M1	Mining	WA	ASX200				√		√
M2	Mining	WA	ASX200			√	√		√
M4	Mining	WA	ASX200				√	√	
M5	Mining	WA	ASX200				√		
M7	Mining	WA	ASX200				√	√	√
M8	Mining	WA	ASX100				√	√	√
M10	Mining	WA	ASX100				√		√
L1	Logistics	WA	ASX200		√	√	√		√
R2	Retail	NSW	ASX200		√		√		

Table Three: Discursive and Material Practices of those with confined interactions

	M1	M2	M4	M5	M6	M7	M8	M9	M10	L1	R2	R1
Discursive Practices												
Win/Win, opportunities												
Strategy, competitiveness, marketing, positioning, leadership					√					√		
Stewardship			√					√			√	
Commitments, leadership												
Credentials, walk-the-talk				√	√						√	
Values, Values-led, responsibility					√							
Trust, relationships							√	√	√			
Engagement, community, staff, conversations, dialogue			√		√							
Continuous improvement, integration/embedding, best practice, change	√											
Clean and Green, environmental footprint, doing the right thing					√							√
Materiality, business-case							√					√
Rehabilitation, operations	√	√	√	√	√	√	√	√	√			
Efficiency	√	√		√				√	√			
Risk		√	√		√						√	
Techno-scientific	√	√	√	√	√	√		√				
Instrumental	√			√	√		√	√	√			
Compliance	√	√	√	√		√	√		√	√		
Conservatism							√					
Material Practices					√							
Sustainability, social, environment Strategy					√							
Board Committee					√							
Environmental Management System	√				√					√		
Certification (eg ISO26000, 14001)					√					√		
Operating Standards, policies, procedures, benchmarking	√				√						√	
Supplier systems, engagement								√				
Stakeholder/community focus groups				√	√	√	√		√		√	
One-on-One stakeholder meetings/consultations, communication		√		√		√	√		√			
Sustainability committee, team											√	
Information Requests/RFP												
Targets, Results					√						√	
Social/environmental programs, projects		√				√	√		√			
Corporate Sustainability Department										√		
Partnerships					√			√				
Compliance reporting	√	√	√	√	√	√	√	√	√			
Social/environmental impact assessments		√	√	√	√	√		√				
Community open days/events												

Table Four: Discursive and Material Practices of those with wide interactions

	M3	FS1	FS2	R1	C1	T1	T2	E1	G1	E2	E3	R3
Discursive Practices												
Win/Win, opportunities	√		√									
Strategy, competitiveness, marketing, positioning, leadership		√	√		√	√	√		√	√		
Stewardship	√											
Commitments, leadership	√	√	√		√	√				√		
Credentials, walk-the-talk	√		√		√	√		√	√		√	
Values, Values-led, responsibility		√	√		√	√		√	√			
Trust, relationships	√		√				√	√				
Engagement, community, staff, conversations, dialogue	√	√	√		√	√		√	√	√	√	√
Continuous improvement, integration/embedding, best practice, change	√	√	√		√	√				√	√	√
Clean and Green, environmental footprint, doing the right thing		√	√		√	√			√	√		
Materiality, business-case		√	√		√	√	√			√		
Efficiency	√			√		√			√	√	√	√
Risk	√			√		√	√	√	√		√	√
Techno-Scientific				√						√	√	
Instrumental	√					√	√	√	√			√
Compliance	√			√		√	√	√	√	√	√	√
Conservatism		√	√	√					√			√
Material Practices												
Sustainability, social, environment Strategy		√	√		√					√	√	√
Board Committee		√						√			√	√
Environmental Management System					√						√	
Certification (eg ISO26000, 14001)					√							
Operating Standards, policies, procedures, benchmarking		√	√		√	√			√	√	√	√
Supplier systems, engagement					√	√						
Stakeholder/community focus groups	√		√	√		√	√	√	√	√	√	
One-on-One stakeholder meetings/consultations, communication	√	√	√		√	√	√	√	√		√	√
Sustainability committee, team		√	√		√							√
Information Requests/RFP		√	√			√				√	√	√
Targets, Results		√	√		√	√	√	√				√
Social/environmental programs, projects		√	√		√		√	√	√	√	√	√
Corporate Sustainability Department		√	√	√	√					√	√	√
Partnerships			√									
Compliance reporting	√							√	√	√	√	√
Social/environmental impact assessments	√			√				√			√	√
Community open days/events	√			√				√				