

# Item 04 – Digitalization impacts – Identifying emerging reporting challenges and needs

## For GSSB discussion

<b>Date</b>	10 September 2024
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<b>Project</b>	Research project – Digitalization impacts
<b>Description</b>	This research paper has been drafted in response to the GSSB request for more research on the sustainability impacts of digitalization, data protection, cybersecurity, and data privacy. This paper consists of a survey of the most significant impacts related to digitalization and emerging reporting needs tied to them. It identifies gaps in the current GRI Standards and proposes updates to a number of relevant Topic Standards for the GSSB to consider.

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# 1 Executive summary

2 Digital technologies are being adopted by businesses, governments, and people at unprecedented  
3 rates. The wider use of new digital tools and services will create – and in certain areas already  
4 creates – various sustainability-related impacts. To understand emerging sustainability reporting  
5 needs resulting from the wider adoption of digital technologies, peer-reviewed academic publications  
6 and resources from leading international organizations were consulted. Three actual and potential  
7 impacts were identified: environmental, economic, and human rights related. Existing GRI Standards  
8 were assessed against these impacts to understand how well they capture digitalization-related  
9 impacts. Actionable recommendations were then developed based on the most recent internationally  
10 recognized frameworks and guidelines around digitalization.

11 Environmental impacts around digitalization arise principally from the development, production,  
12 maintenance, and disposal of the physical infrastructure that enables and sustains digitalization. This  
13 infrastructure has become increasingly complex, robust, and expansive over time. It includes  
14 resource-intensive data centers, undersea and underground fiber optic cables, satellites, cell towers  
15 and base stations, and personal devices.

16 Digitalization affects economic variables such as productivity, competition, labor, and employment.  
17 Evidence shows that digitalization has had uneven productivity impacts across organizations,  
18 depending on the capacity of the organization to leverage digital technologies effectively. Regarding  
19 labor and employment impacts, new digital technologies are impacting lines of work differently from  
20 previous waves of automation. While digitalization has led to some job displacement in the economy,  
21 it is also creating new opportunities at an accelerated rate.

22 Digitalization creates human rights implications via collecting and using personal data and human  
23 interaction with digital services, including artificial intelligence (AI). The widespread collection and use  
24 of personal data pose privacy and protection risks, with current regulatory frameworks struggling to  
25 keep pace with technological advancements. Broader uptake of AI and algorithmic decision-making  
26 can lead to biases and discrimination in employment opportunities and access to essential services.

27 Despite widespread characterizations of digitalization as a transformative opportunity to achieve  
28 sustainable development, this opportunity depends on many other intervening factors. While digital  
29 technologies offer potential for advancing sustainable development, there is limited evidence that this  
30 potential has become a reality. On the contrary, available evidence suggests that increasing digital  
31 transformation has intensified resource consumption and adverse environmental impacts due to  
32 substantial increases in e-waste, energy and water use of data centers, and production of  
33 technological hardware. Regarding human rights impacts, the lack of transparency over data  
34 governance and AI systems underscores the need for robust governance and reporting frameworks.

35 The GRI Standards partially cover the broad impacts of digitalization. Environmental and economic  
36 Topic Standards are robust and comprehensive, and given the ongoing update of economic impact  
37 and labor-related Standards, it is possible to capture digitalization impacts under these categories.

38 More reporting guidance on these impacts would help reporters understand the effects of decisions to  
39 adopt digital technologies. The reporting gap is substantial regarding the more unique impacts of  
40 digitalization, such as questions around data governance, AI-use, and algorithmic decision-making.  
41 While some unique aspects, as in *GRI 418: Customer Privacy, are covered*, existing disclosures need  
42 updating, reporting expectations should align with internationally recognized frameworks, and new  
43 disclosures addressing AI deployment must be developed.

44 Globally, a rapidly evolving regulatory landscape is shaping the future of digital transformation, with  
45 efforts across various jurisdictions aimed at influencing its direction. It is evident that not only GRI, but  
46 also other internationally recognized sustainability reporting frameworks are lagging in setting  
47 reporting expectations around the adoption of digital technologies and the implications this transition  
48 brings.

## 49 **Recommendations**

50 **Pursue a digitalization project** – In light of the assessment of GRI Standards and a review of the  
51 emerging regulatory and policy landscape on digitalization impacts, it is proposed that the GSSB  
52 considers pursuing a digitalization project to reflect the current Standards' reporting needs. Topic  
53 Standards identified as needing an update are *GRI 405 Diversity and Equal Opportunity, GRI 406:*  
54 *Non-discrimination, GRI 417 Marketing and Labeling, and GRI 418: Customer Privacy*. The project  
55 should consider revising these Standards to address aspects of digitalization that the current GRI  
56 framework omits, including data governance, cybersecurity, and AI adoption.

57 **Mainstream digitalization in other Topic Standards** – This would require integrating impacts that  
58 arise from adopting digital technologies not only from a data governance and cybersecurity  
59 perspective but also to allow for integrating environmental and economic impacts more clearly. For  
60 instance, the ongoing revision of the pollution-related GRI disclosures can consider the environmental  
61 impacts associated with maintaining the digital world, such as high reliance on water and energy to  
62 sustain data centers. Regarding ongoing projects such as labor and economic impacts, the respective  
63 working groups can consider the relevant categories of impacts identified in this paper. Integrating  
64 impact considerations in new GRI Standards projects would help SMEs and non-tech organizations  
65 using digital technologies to address digitalization impacts during their materiality assessments.

66 **Consider sector-specific impacts** – Following up on our current research on the broader impacts of  
67 digitalization, sector-specific research is proposed for consideration, as each sector has unique  
68 characteristics, capacities, and opportunities that influence how digitalization unfolds. Digitalization  
69 can have different impacts on sectors depending on their level of technological adoption, regulatory  
70 environment, and market dynamics. Also, sectoral differences can mediate where impacts occur  
71 along the digitalization value chain. For instance, in manufacturing, digitalization might focus on  
72 automation and the Internet of Things (IoT), while in finance, it might center on blockchain, big data  
73 analytics, AI-driven analytics, and customer services. Sector-specific research helps identify these  
74 unique factors that would inform decision-making. Conducting sector-specific research on the tech  
75 industry is also important, as it is the digital service provider to the economy. Additionally, most

76 environmental impacts arise within the tech sector, particularly through the maintenance of digital  
77 infrastructure.

78 **Produce other documents** – Producing documents or resources such as reporting guidance,  
79 publishing research papers, discussion notes, and training material could also help non-tech or  
80 smaller organizations better understand the implications of their choices in adopting digital  
81 technologies.

82 **Monitor the evolving policy landscape** – In light of the rapidly evolving regulatory, policy, and  
83 reporting landscape around digitalization, continued monitoring of this landscape should be  
84 considered. Staying informed about regulatory developments is crucial for GRI's strategic positioning  
85 and adaptation in the face of policy shifts. This could be done by collaborating with GRI's policy,  
86 Standards, and research functions.

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## 87 Introduction

88 Digitalization – defined as the use of digital technologies and data as well as interconnection that  
89 results in new or changes to existing activities – is often described as the ‘transformational opportunity  
90 of our time’ [76] [13]. Digital connectivity and data are essential for everyday life, from online shopping  
91 to maintaining critical services like healthcare, energy, water treatment, and agriculture. Digital  
92 technologies are also being increasingly adopted for environmental purposes, with applications  
93 ranging from monitoring salinity levels of oceans to biodiversity monitoring. Despite the digitalization  
94 gap<sup>1</sup>, digital technologies are being adopted faster than any previous technological advancement [2]  
95 [13].

96 Since 2010, the number of internet users worldwide has more than doubled, while global internet  
97 traffic has expanded 25-fold [37]. At least 63% of the world’s population has internet connectivity [73].  
98 While the initial connectivity surge occurred in developed economies, developing economies are also  
99 rapidly catching up, accounting for around 90% of total growth in mobile broadband subscriptions  
100 between 2012 and 2017 [35].

101 This data, technology, and connectivity surge has been described as the second machine age [13].  
102 The rapid advancements in digital technologies mark a significant departure from the first machine  
103 age, the Industrial Revolution. While the first machine age transformed the world with the advent of  
104 production at the industrial scale, the second machine age is revolutionizing the digital landscape with  
105 the potential to create fundamental societal change [13].

106 An equally impressive technology sector boom is accompanying the digitalization boom. As of the  
107 writing of this report, the top five most valuable companies globally by market capitalization are  
108 technology firms, collectively valued at over USD 14 trillion. Figure 1 depicts their growth over a 15-  
109 year span, during which technology organizations such as Apple, Google (Alphabet), Microsoft,  
110 Amazon, and Meta overtook firms from traditionally dominant industries like energy, retail, and  
111 pharmaceuticals. Organizations in the technology sector are also seeing unprecedented levels of  
112 overall investment through various streams of public, private, and capital market funding.

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<sup>1</sup> The digitalization gap refers to the disparity between individuals, organizations, or regions in terms of access to, adoption of, and effective use of digital technologies. This gap can manifest in various ways, including differences in internet connectivity, digital literacy, availability of digital infrastructure, and the ability to leverage digital tools for economic, educational, and social benefits. The digitalization gap often results in unequal opportunities and outcomes, reinforcing existing socio-economic inequalities and creating barriers to participation in the digital economy and society.

113 **Figure 1. Largest companies by market capitalization between 2002-2017 [35]**



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115 By all accounts, the emergence of digital technologies and their transformation are likely to endure. In  
 116 a few years, machine learning and big data advances have enabled the mass adoption of artificial  
 117 intelligence tools [19]. The diffusion of digital technologies and the potential of digital transformation  
 118 hold opportunities for developing nations to improve well-being, economic productivity, and growth  
 119 [53]. Developing economies are adopting strategies to effectively leverage digital technologies to  
 120 address governance and developmental needs [76].

121 Major economies also drive further digital innovation and adoption through official government policy.  
 122 In doing so, they aim to simultaneously gain an edge in technological innovation while accounting for  
 123 risks around new digital technologies. The United States Safe Innovation Framework aims to put the  
 124 United States at the forefront of global technological innovation while establishing a robust regulatory  
 125 framework to ensure innovations are secure, accountable, and explainable. The European Union's  
 126 Digital Strategy aims to achieve digital transformation of the EU by 2030 while also promoting digital  
 127 transformation to enhance the EU's global competitiveness [22]. Through its National Digital Plan,  
 128 China seeks to expand its digital infrastructure and economy while taking a leading role in advancing  
 129 digital innovation [66].

130 Adopting new tools and services made available through digital technologies is likely to create – and  
 131 in certain areas already creates – various impacts. For example, energy companies are deploying  
 132 smart power meters and household devices that adjust electricity usage based on supply and demand  
 133 in the grid. In urban settings, cities use digital tools for predictive maintenance and optimize traffic flow  
 134 through adaptive signal control systems. In manufacturing, increased data availability from  
 135 interconnected sensors can lead to efficient resource use and customized production outcomes.  
 136 Emerging technologies are unlocking new capabilities that enable monitoring of at-risk ecosystems  
 137 [67].



138 Digitalization of various customer-facing services, including financial services, health services, retail,  
139 and others, has transformed these sectors while bringing to the forefront concerns around data  
140 privacy and security, as well as around potential bias and discrimination [7]. The environmental cost  
141 of digital transformation is also unclear, with digitalization having been described as a 'potential fire  
142 accelerant' [27], an environmental 'game changer' [59], or 'a core component of the green transition'  
143 [30]. Indeed, the transformative power of digital technologies poses significant opportunities for the  
144 sustainable use of resources. Meanwhile, subject matter experts and academic literature are  
145 approaching this transformative potential with a degree of caution, as the German Advisory Council  
146 on Global Change concludes, 'Technical innovation surges do not automatically translate into  
147 sustainability transformations but must be closely coupled with sustainability guidelines and policies'  
148 [27].

149 For GRI, digitalization represents an important issue with knock-on effects on some Topic Standards,  
150 as well as unique impacts underexplored in the current framework. The GSSB Work Program 2023-  
151 2025 identified digitalization, data protection, cybersecurity, and data privacy as a research priority,  
152 with the potential to explore the subject further to assess the need for developing a Topic Standard.  
153 Therefore, this research aims to provide an understanding of the impact of digitalization on the  
154 economy, the environment, and people, including their human rights. It also allows the GSSB to make  
155 an informed decision about the need to develop a Topic Standard for digitalization. This research  
156 paper consists of a survey of the most significant impacts related to digitalization.

157 The report is structured as follows: scoping and methodology and an overview of digital technologies,  
158 including the related physical infrastructure and services. The following sections identify and elaborate  
159 on the impacts of digitalization across three main categories, namely impacts on the economy, the  
160 environment, and people, specifically human rights implications. To understand the need for a Topic  
161 Standard, the following section assesses the fitness of relevant GRI Standards in capturing impacts  
162 previously identified. The final section provides an overview of existing reporting expectations around  
163 digitalization impacts, followed by the conclusion and actionable recommendations for the GSSB.

# 164 Scoping and methodology

## 165 Scope

166 Digitalization is a complex topic with crosscutting impacts. The impacts of digitalization occur across  
167 the entirety of a digital technology's life cycle, from the initial design to its deployment, as well as after  
168 its retirement. Furthermore, digitalization is made possible through the interconnection of  
169 technological devices and digitized data facilitated by a robust physical infrastructure that underpins  
170 the entire digital ecosystem. While responsible design and development of new digital technologies is  
171 crucial, this research project reviewed the impacts of digital technology adoption. The research also  
172 focused on the physical infrastructure surrounding digital activity and its impacts on the economy, the  
173 environment, and people, including their human rights. This approach was selected because focusing  
174 solely on technology companies and the development phase of digital technologies would limit the  
175 investigation of the impacts of digital technologies across all sectors. Responsible design and  
176 development of digital technologies should be a separate research project focusing on the technology  
177 sector. This research was therefore carried out with a sector-agnostic approach.

## 178 Methodology

179 In order to prepare this research paper, the following research methodology was used:

180 **Scoping** – Conducted to determine what constitutes digitalization, specifically to separate the  
181 activities of organizations in the technology sector from the broader category of digitalization. This  
182 was done to guide research according to the existing GRI Sector and Topic Standards and to  
183 maintain a sector-agnostic approach.

184 **Desk research** – Conducted to identify relevant qualitative and quantitative data on the various  
185 impacts of digitalization. As shown in the bibliography section, this paper has identified and leveraged  
186 a wide range of sources through targeted searches within academic journals, scholarly search  
187 engines (Google Scholar, Scopus, and Web of Science), as well as websites of globally recognized  
188 organizations such as the United Nations, the Organization for Economic Cooperation and  
189 Development (OECD), the International Labour Organization (ILO), among others.

190 **Frameworks analysis** – 26 Existing frameworks, guidelines, principles, and regulations were  
191 reviewed to understand the regulatory and reporting landscape of digital technologies. The regulatory  
192 and policy landscape around digital technologies are inconsistent and scattered. Therefore, texts from  
193 a variety of regulatory jurisdictions were reviewed. This analysis informed the drafting of the report,  
194 and the database of these frameworks can be found in the project documentation.

195 **External engagement** – The principal researcher attended workshops and conferences on  
196 digitalization, technology policy, and tech ethics and held two consultation meetings with experts. One  
197 expert was from academia, whereas the other was from the NGO sector.

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# Overview of digital technologies

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## Describing digitalization

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Digitalization refers to the growing application of information and communication technologies across the economy [35]. However, there is no consensus on the definition of digitalization. A widely cited academic paper on digital transformation points to the lack of academic literature on this concept:

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'Despite the ubiquity and visible impact of digital transformation and resultant new digital business models, the academic literature has so far paid surprisingly little attention to these developments, only recently starting to address the topics of digitization, digitalization, and digital transformation.' [72]

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Among the international authoritative instruments, the OECD has defined digitalization in its landmark document, *Digitalisation and Responsible Business Conduct*, as 'the use of digital technologies and data as well as interconnection that results in new or changes to existing activities' [57]. This definition captures the essential components of digitalization, namely data and interconnection, which enable widespread adoption. It also touches on the transformative nature of digitalization, a research focus, as the potential and actual impacts associated with adopting digital technologies were investigated.

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Digitalization is made possible through digitization and interconnection, both of which are technological trends in their own rights [13] [6]. Digitization consists of transforming analog information such as sound, image, or printed text to digital data so that digital devices can interpret without degradation and at a very low cost. Without digitization, digital technologies would not have any data to function, and digital transformation would not be possible [13]. Interconnection (or connectivity, or interconnectivity) refers to integrating and communicating between various digital systems, devices, and technologies through digital communication networks [6] [53]. It enables real-time flow, exchange, and data processing across different technologies. Through leveraging interconnectivity and digitization, a range of new digital technologies have emerged over the years. The collection of these technologies and services largely drives digital transformation [6].

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The increasingly complex, robust, and expansive physical infrastructure is central to digital transformation, ranging from data centers, undersea and underground fiber optic cables, satellites, cell towers and base stations, and personal devices. The following section briefly describes some of the most significant digital technologies and the physical infrastructure that sustains them.

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## Artificial intelligence

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Artificial intelligence (AI) is a crucial component of digitalization as the new wave of digitalization is partly driven by a growing interplay between AI systems and other digital technologies.

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231

AI processes vast amounts of data, which may originate from diverse sources, including human language, sensors, or text, through software that allows it to draw conclusions, adjust its parameters,

232 and produce outputs. The combination of high precision and low computation time makes AI a cutting-  
233 edge digital technology [19]. AI can be integrated with larger digital technologies to compound their  
234 impact [20].

235 Despite lacking a commonly agreed-upon definition for AI, AI systems usually carry similar  
236 characteristics [50]. The closest consensus to the definition of an 'AI system' is provided by the  
237 OECD: 'An AI system is a machine-based system that, for explicit or implicit objectives, infers, from  
238 the input it receives, how to generate outputs such as predictions, content, recommendations, or  
239 decisions that can influence physical or virtual environments' [31].

240 Machine learning is a concept that involves a set of techniques that allows machines to improve their  
241 performance and usually generate models in an automated manner through exposure to training data,  
242 which can help identify patterns and regularities rather than through explicit instructions from a human  
243 [55]. Machine learning is integral to the life cycle of AI systems from development to the end-use  
244 phase.

245 Wider adoption of new digital technologies, such as artificial intelligence, incentivizes further  
246 widespread data collection, storage, and processing. AI-system training requires large datasets,  
247 thereby increasing the salience of reporting on AI use and development [68].

## 248 **Big data analytics**

249 Big data describes large datasets that are high in volume<sup>2</sup> and variety,<sup>3</sup> and are created and shared at  
250 high speeds. It also involves the collection of large amounts of data from an array of digital sources  
251 and sensors, including online personal, behavioral, and biometric data of people [41]. Big data  
252 analytics is described as a set of tools and techniques deployed to process, analyze, and visualize  
253 data generated through the digitization of content, tracking of human activities, and connectivity of  
254 physical objects [41] [18] [27].

## 255 **Cloud technology**

256 Cloud technology enables the storage of digitized data over a connected network. Due to the  
257 expansion of digital services, organizations have come into possession of considerable amounts of  
258 data, often without the hardware and infrastructure needed to store it [47]. Cloud technology allows  
259 organizations to overcome this issue without needing significant upfront investments in hardware and  
260 infrastructure. A cloud service provider – for instance, Amazon or Google – provides access to its  
261 services to manage, secure, and store data [16].

262 The rapid growth of cloud services brought about pressing challenges related to commercializing  
263 private consumer data, data privacy, and data ownership. The relationship between data providers,  
264 data hosts, and third-party cloud service providers often lacks transparency. Cloud providers may

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<sup>2</sup> Amount of data.

<sup>3</sup> Type of data (text, video, satellite data, sensor data, activity logs).

265 engage in data mining or sell whole datasets without explicit consent. It is also unclear who holds  
266 ownership of consumer data in the cloud environment as data crosses multiple physical geographical  
267 locations, blurring jurisdictional lines. This raises issues about legal rights to data access and control,  
268 especially when data is subject to different regulatory frameworks where it is stored [39].

## 269 **Internet of Things**

270 The Internet of Things (IoT) refers to the interconnection of physical devices and objects that can be  
271 controlled or modified via the internet, with or without human intervention [53]. The IoT consists of  
272 sensors that collect and share data among devices and with humans. These networked sensors and  
273 the data they gather can be utilized to monitor health, track locations and activities, oversee  
274 production processes, and evaluate the efficiency of city services and the natural environment [6].

## 275 **Online platforms**

276 An online platform is a digital service that facilitates interactions and transactions between two or  
277 more sets of users who interact via the internet. These platforms can take various forms, including  
278 social media platforms, e-commerce platforms, educational forums, and collaborative workspaces,  
279 each designed to support specific types of user engagements and activities [13]. An online platform  
280 typically includes user registration, content creation, communication tools, and transactional  
281 capabilities. The architecture of such platforms often relies on a combination of digital and physical  
282 technologies, databases, and cloud services [6].

## 283 **Physical infrastructure**

### 284 **Data centers and data transmission networks**

285 These facilities house servers and storage systems that process and store vast amounts of data. Data  
286 centers are the physical locations where cloud computing and storage services operate. Data centers  
287 enable all digital technologies that businesses and people rely on. Subcomponents of data centers  
288 are power supply and energy infrastructure, including backup power systems such as uninterruptible  
289 power supplies (UPS) and generators to ensure continuous operation. Cooling systems maintain  
290 appropriate working temperatures in data centers and other high-density electronic environments to  
291 prevent overheating and equipment failure.

292 **Figure 2. Image of the Amazon data center in Oregon, United States**

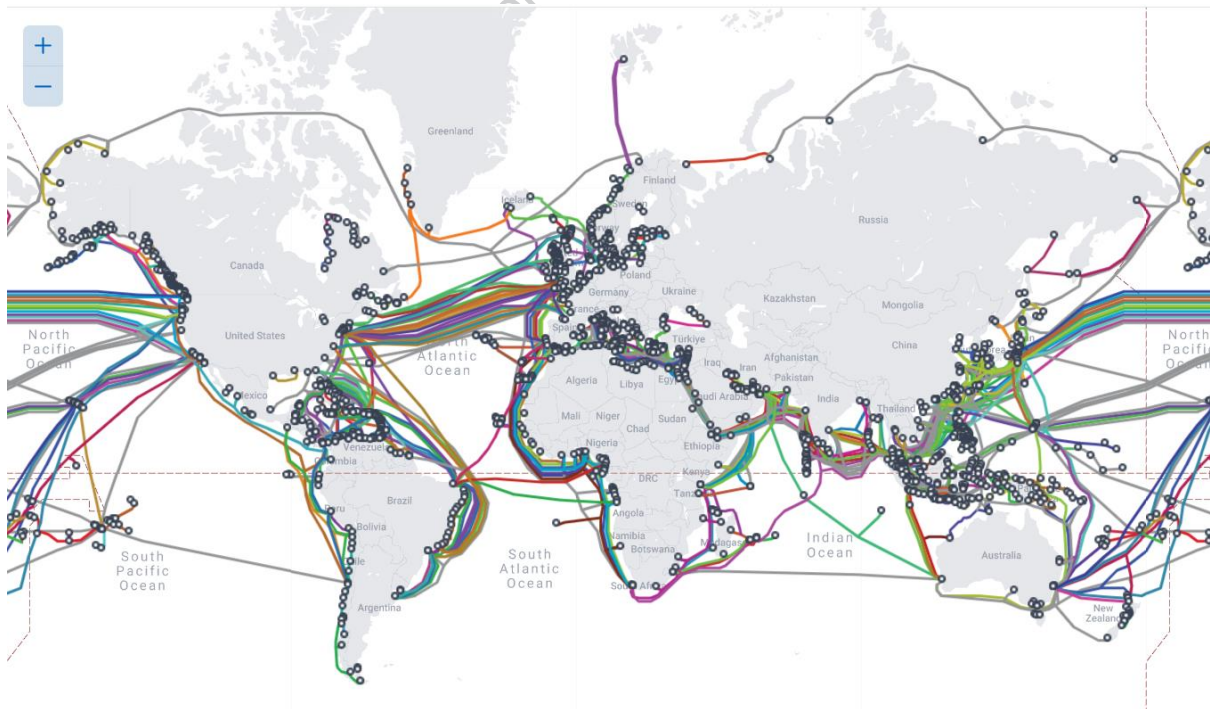


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### 294 **Fiber optic cables**

295 Underground and submarine fiber optic cables are essential to the internet's physical infrastructure as  
296 they allow for transmitting data at high speeds across long distances. Submarine fiber optic cables  
297 connect grounded telecommunications and rapidly exchange large amounts of data globally.

298 **Figure 3. Illustration of publicly available submarine cables [64]**



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## 300 **Cell towers and base stations**

301 These structures support wireless communication by connecting mobile devices to the broader  
302 telecommunications network.

## 303 **Satellites**

304 Satellites facilitate communication in remote and underserved areas where terrestrial infrastructure is  
305 lacking. They enable the reach of digital technologies across the world. Digital services such as  
306 broadcasting, navigation, and global positioning systems (GPS) rely on satellite connections to  
307 transmit signals across devices.

## 308 **Internet of Things infrastructure**

309 The Internet of Things (IoT) infrastructure contains different technologies and components of  
310 technology that work together to enable the connectivity, communication, and management of IoT  
311 devices. These include sensors,<sup>4</sup> actuators,<sup>5</sup> and connectivity modules<sup>6</sup> that enable smart devices to  
312 collect and transmit data with other devices or networks of devices.

313 Personal technology devices are also a key component of the IoT infrastructure as they serve as the  
314 primary interface through which individuals interact with digital technologies and data. Personal  
315 devices include smartphones, computers and laptops, tablets, wearable devices, and smart home  
316 devices.

# 317 **Impacts of digitalization**

318 While not exhaustive, this section covers the most significant impacts associated with a broader  
319 uptake of digital technologies.

320 The impacts of digitalization arise principally from the development, production, maintenance, and  
321 disposal of the aforementioned physical infrastructure. This involves information and communication  
322 technologies equipment, data centers, and data transmission networks, as well as developing and  
323 adopting digital technologies or software [27] [42] [47]. Therefore, when considering the sustainability  
324 impact of digitalization, it is important to consider the immediate tools and services existing in the  
325 digital space, the physical infrastructure that enables digitalization, and the production of personal and  
326 commercial pieces of technology. Nevertheless, the impacts associated with using and maintaining  
327 digital technologies are crosscutting and multidirectional, making categorizing impacts into clearly  
328 divided categories challenging. For instance, capturing the carbon footprint of digital technologies  
329 throughout their lifecycle requires insights into the complex supply chain behind digital technologies,

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<sup>4</sup> Devices that detect and measure physical properties such as temperature, humidity, light, motion, and pressure.

<sup>5</sup> Components that perform actions in response to commands received from the IoT system, such as adjusting a thermostat, turning on a light, or opening a valve.

<sup>6</sup> Communications technologies such as Wi-Fi and Bluetooth or through cellular networks.

330 including the relationship between the technology industry, the energy industry, and the extractives  
 331 industry.

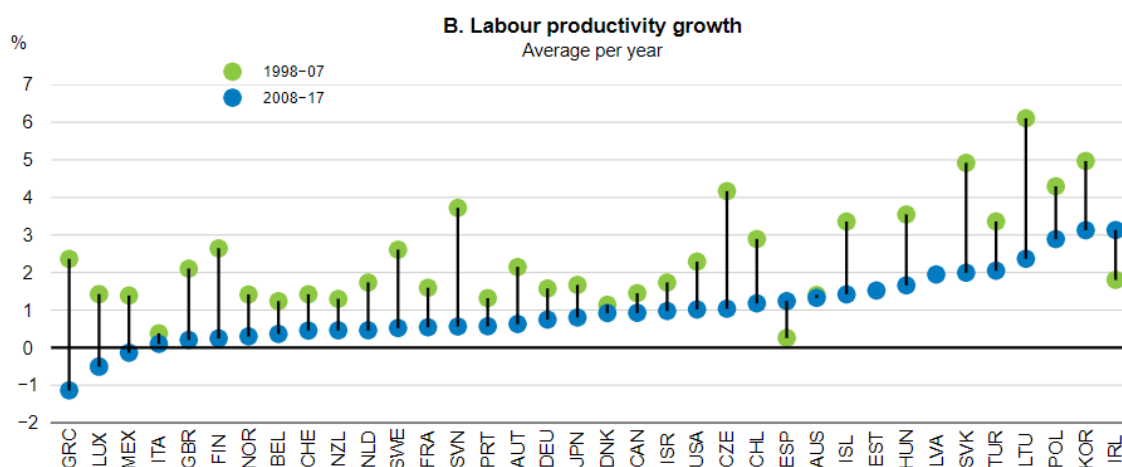
## 332 Impacts on the economy

333 Digitalization has impacts on the economy by affecting economic aggregates, mainly productivity,  
 334 competition, labor, and employment. Digital technologies generate firm-level capacity for gathering  
 335 and analyzing information that addresses various market inefficiencies [52] [53] [2]. Through  
 336 monitoring, interconnecting, and manipulating physical modes of production, digital technologies  
 337 enable the collection, management, and processing of data, leading to insights about materials,  
 338 products, and processes [71] [6].

339 However, digitalization has had uneven economic impacts on organizations from a productivity  
 340 standpoint. Despite spearheading the digital transformation, most OECD countries have seen a sharp  
 341 decline in productivity growth over the past two decades [52]. While the declines in productivity growth  
 342 in OECD countries depicted in Figure 4 are multicausal, productivity gains from digitalization have not  
 343 been sufficiently large to offset other factors.

344 OECD suggests that declining or even gaining productivity is a result of organizations' uneven  
 345 distribution of capabilities and resources [52]. Other research notes that small- and medium-sized  
 346 enterprises (SMEs) and start-ups might face more difficulties accessing and using data, information,  
 347 and knowledge generated by these technologies. This difficulty may prevent them from fully  
 348 leveraging these technologies compared to firms with a more established technology experience [6].  
 349 OECD research indicates that firms with more resources to develop and use digital technologies have  
 350 benefitted more from digitalization than others [52]. This suggests that productivity impacts brought  
 351 about by digitalization may be more limited than previously thought.

352 **Figure 4. Source: OECD (2019)**



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## 354 **Labor and employment impacts**

355 Adoption of digital technologies can impact employment and livelihoods. Job displacement is  
356 recognized as a potential negative impact of using artificial intelligence and automation by the IEEE,  
357 OECD, and the World Economic Forum [53] [65] [75]. Changes to business models triggered by the  
358 adoption of digital technologies can carry employment impacts across most sectors in terms of job  
359 creation, job displacement and job quality, and widening skills gaps [6]. Indeed, over 85% of  
360 organizations surveyed by the World Economic Forum believe increased adoption of new disruptive  
361 digital technologies such as AI is the most likely driver of organizational transformation, while 75%  
362 expect to adopt such technologies soon [75].

363 Wider adoption of AI-systems and advances in generative AI enable the automation of non-industrial  
364 work functions, such as reasoning, communicating, coordinating, and planning [2] [31]. Because of  
365 the unique abilities of AI systems and the rapid rate of advancement in their capabilities, work areas  
366 previously unaffected by former waves of automation may now become jeopardized.

367 So, it is important to clarify whose livelihoods may be affected by the advent of these new types of  
368 technology [1] [2]. While previous technological improvements altered jobs, mostly in industrial  
369 production, digitalization is targeting jobs in accounting, sales, logistics, trading, and certain  
370 managerial occupations [2]. A Goldman Sachs projection estimates that AI could affect over 300  
371 million jobs in the coming decade, with most at-risk fields of work being office and administrative  
372 support jobs and legal work [28]. A McKinsey report meanwhile estimates that up to 800 million  
373 people could be left without a job due to automation by 2030 [45]. While as much as 80% of the  
374 United States workforce could have their work affected by the adoption of AI-tools, workers in higher-  
375 income jobs face 'potentially greater exposure' to their effects [20].

376 However, prior innovations have also led to job displacement, which was counterbalanced by the  
377 emergence of new jobs. This is partly due to the introduction of the innovation that led to  
378 displacement in the first place, described as the 'reinstatement effect' [2]. Furthermore, it remains  
379 unclear whether the job displacement brought about by digitalization will have characteristics unique  
380 from prior waves of displacement and reinstatement.

381 Taking a broader view and considering that new job opportunities arise due to digitalization as well,  
382 the overall impact of digitalization on employment may be less significant than predicted by the most  
383 alarmist accounts. The World Economic Forum, for instance, expects the impact of 'most  
384 technologies' on labor demand to be a net positive over the next four years because some of the  
385 fastest-growing job areas concern technology and digitalization [75].

## 386 **Market concentration**

387 Market concentration around digital technologies is another significant economic impact. A few  
388 powerful technology organizations dominate digital technologies and associated services. For  
389 instance, Meta owns products across several digital service streams, including Facebook, Instagram,

390 Threads, and WhatsApp. Their collective subscription surpasses 8 billion, affording Meta an  
391 'overwhelming dominant position' in the social media market [43].

392 A federal court in the United States recently ruled that Google has maintained an unlawful monopoly  
393 on internet search services and text search advertisements. The ruling highlights that Google used its  
394 dominant market position to suppress competition and restrict consumer options in the internet search  
395 industry. The case laid out how Google, which dominates nearly 90% of all internet searches,  
396 manipulated its position in the market by charging advertisers artificially high prices [60]. Google will  
397 likely challenge this ruling, although it will have far-reaching effects on the technology sector. Other  
398 dominant players now face increasing scrutiny over their business practices, both legislatively and  
399 from stakeholders. This underlines the need for concrete reporting expectations by disclosing  
400 behavior that can be deemed anti-competitive [56].

401 With the deeper integration of digital technologies in all aspects of daily life, market concentration  
402 around cybersecurity can have widespread implications. Major cybersecurity firms such as  
403 CrowdStrike and Cloudflare protect a substantial portion of the global digital infrastructure.  
404 CrowdStrike provides cybersecurity services for Microsoft, the world's second-largest cloud service  
405 provider, with Amazon Web Services leading the market and Google following in third place. These  
406 organizations take up over two-thirds of the cloud services market. Despite the disconnected nature of  
407 digital technologies, the fact that its main infrastructure, cloud computing, is maintained by a few  
408 actors makes the entire digital ecosystem vulnerable. While these systems have robust safety  
409 mechanisms, a successful breach or an internal malfunction would create catastrophic impacts on the  
410 global economy. In July 2024, for instance, a global disruption to Microsoft-powered devices was  
411 caused by a failed update of CrowdStrike systems, affecting nearly nine million devices worldwide  
412 [26]. The disruption caused ripple effects across many sectors, including public services, healthcare,  
413 and transportation, including the cancellation of over five thousand flights.

## 414 **Impacts on the environment**

415 Digitalization creates environmental impacts by changing how people, organizations, and broader  
416 society interact with their environment [67]. Emerging digital technologies offer numerous options to  
417 enhance environmental protection and reduce greenhouse gas (GHG) emissions, although they also  
418 create their own environmental impacts. Digitalization has impacts on natural resources because of  
419 infrastructure and combinations of technology required to maintain the digital world [47]. These  
420 impacts arise from land, energy, and water use.

### 421 **Emissions impacts**

422 The adoption of digital technologies is presented as a way to reduce global GHG emissions [4] while  
423 also ensuring long-term growth [76]. Digital technologies can potentially reduce emissions in other  
424 industries and dematerialize consumption[30]. So, the positive impact on GHG emissions is indirect  
425 because digital technologies enable a change from existing practices that may damage the  
426 environment. However, their transformative power is limited without targeted regulation and policy

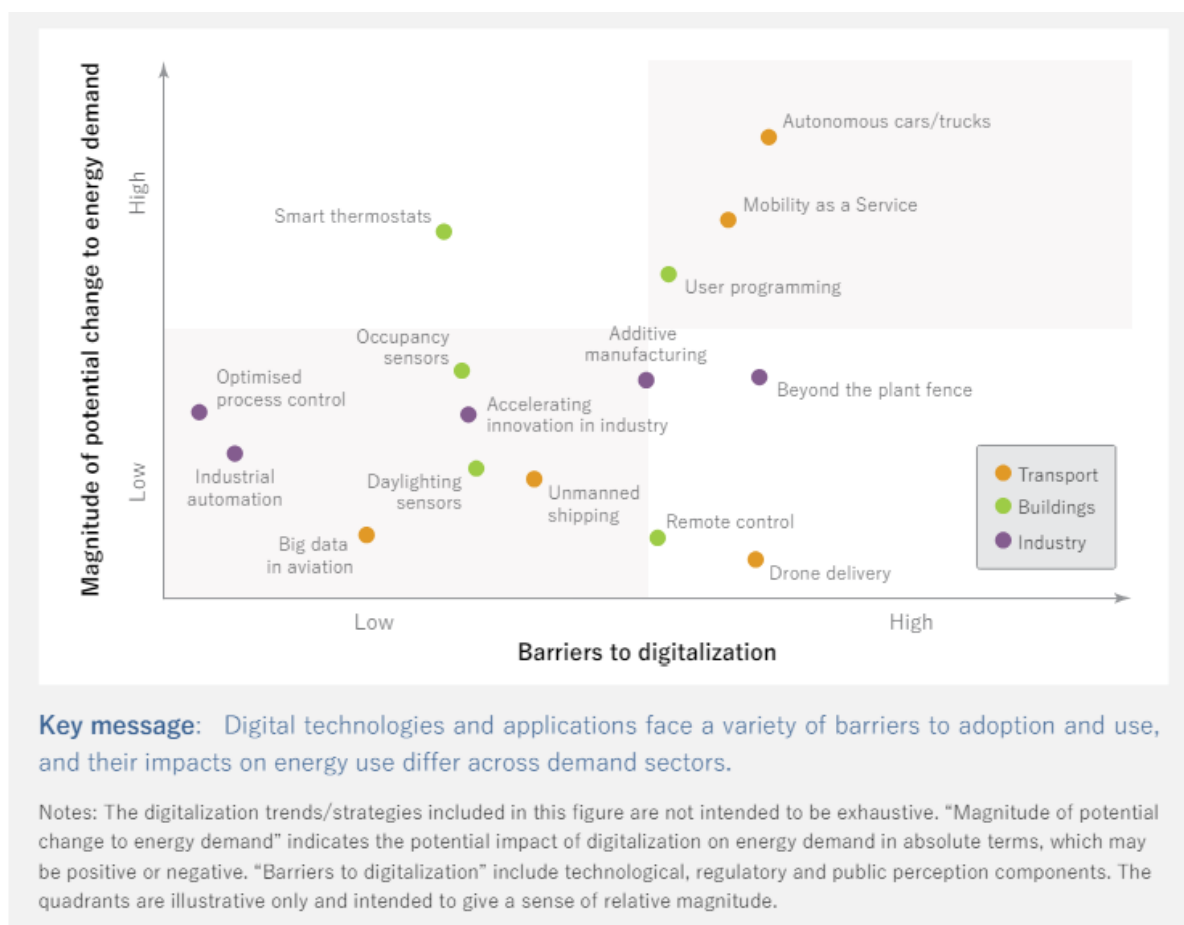
427 [42]. For instance, new digital technologies are being deployed to increase biodiversity monitoring,  
428 which provides more frequent and reliable information regarding ongoing risks to biodiversity.  
429 Nevertheless, better information does not provide the preconditions to alter the underlying causes that  
430 create the risks in the first place [42]. Therefore, positive impacts have the potential but depend on  
431 various factors to contribute meaningfully.

432 In transport, the IEA estimates that further automation and electrification could either reduce energy  
433 use in this sector by about half or increase it by more than double, depending on the interaction  
434 between technological advancements, the rate of adoption, policy responses, and human behavior  
435 [35]. Without advances in energy efficiency, implementing smart energy technology may not lead to  
436 overall reductions in energy use and could even offset potential decreases. A comprehensive study  
437 looking at the potential for energy savings by 2050 through digitalization finds that if strong energy  
438 efficiency advancements do not counteract digitalization, energy consumption could rise to 42% from  
439 the study's baseline [12].

440 The rebound effect associated with the adoption of digital technologies should also be considered.  
441 This phenomenon refers to how adopting digital technology can reduce environmental impacts, like  
442 dematerializing goods or lowering transportation needs, while increasing energy consumption from  
443 electronic devices. In other words, the growth in digital goods like hardware and energy-heavy  
444 services like cloud computing and data center maintenance can offset the efficiency gains from digital  
445 economy practices [6] [27] [37].

446 The potential dual impact of digitalization on energy demand is depicted in Figure 5 by considering  
447 the barriers to digitalization in three energy-intensive areas: transport, buildings, and industry. For  
448 instance, the barriers to digitalization in industrial automation are low, allowing organizations to adopt  
449 digital technologies more easily than in the transportation sector. However, this form of digitalization  
450 has minimal impact, which means that considering all the energy efficiencies gained by introducing  
451 digital technologies in industrial production, the overall effect on energy demand may nevertheless be  
452 limited.

453 **Figure 5. Digitalization's Potential Impact on Transport, Buildings, and Industry (IEA, 2017)**



454

455 Capturing emissions impacts around digitalization has also proven to be a challenge in scientific  
 456 literature. Data gaps in digital technologies' energy consumption, the dynamic and open-ended nature  
 457 of digital innovation, and the poor track record of digitalization projects make their climate impact  
 458 'unknowable' [30]. The gaps in available data on emissions lead researchers to make various  
 459 assumptions for key variables in their research design, such as estimates for the lifetime and energy  
 460 efficiency of digital devices, the extent to which digitalization changes consumption behavior, and the  
 461 number of users of material and digital products. After reviewing 31 studies on the emissions impacts  
 462 of digital technologies (specifically digital goods)<sup>7</sup>, researchers identified significant variances in the  
 463 estimates of energy use impacts attributed to digital technologies [15].

464 Indeed, various estimates produce different pictures of the emissions cost of digitalization depending  
 465 on the accounting metrics used. One academic study notes that only considering the emissions load  
 466 of data centers' electricity usage would account for 0.3% of overall carbon emissions globally [47].  
 467 This figure increases to 2% of emissions if the accounting is expanded to cover networked devices  
 468 like laptops, smartphones, and tablets. Other estimates put global emissions created by digital  
 469 services between 2-3% of all global emissions [4]. The United Nations Environment Programme

<sup>7</sup> E-books, e-magazines, e-journals (grouped under e-publications), e-news, e-business, e-music, e-videos, and e-games

470 attributes 4% of all direct GHG emissions from the ICT sector, almost as much as the entire aviation  
471 industry [67].

## 472 **Energy impacts**

473 Digitalization impacts energy use by increasing energy consumption at the household and business  
474 levels due to higher reliance on digital technologies and electronic equipment. Scholars and experts  
475 point to machine learning processes – integral to the development and use of many AI-systems  
476 deployed in recent years – as a particular energy-intensive area of digitalization [47] [40].

477 New generative digital technologies such as ChatGPT and AI-tools technology developed by  
478 companies such as Google, Samsung, Yahoo, and Microsoft are expanding and require substantially  
479 more energy to function outputs compared to traditional internet searches [44]. A review of the  
480 available evidence on carbon emissions and water use shows that generative AI technologies are  
481 ‘distinctly resource intensive’ [40].

482 Furthermore, the maintenance of data centers is energy intensive. In 2022, the IEA estimated the  
483 energy demand from data centers and AI and cryptocurrency tech to be 2% of global electricity  
484 demand [37]. The IEA warned that data centers are becoming major contributors to rising electricity  
485 demand in many regions, with over one-third of the projected increase in US energy consumption for  
486 2024-2026 attributed to the growth of the data center sector [37]. The report also warns that without  
487 crucial regulatory intervention and technological progress, the electricity demand for data centers  
488 could more than double by 2026, reaching the electricity consumption levels of Japan [37].

489 According to the US Department of Energy, energy use from information technology equipment has  
490 increased by over 35% since 2005, largely due to increased internet use by people and organizations  
491 [70]. Microsoft’s 2023 Sustainability Report indicates that the company’s CO<sub>2</sub> emissions increased by  
492 30% compared to 2020 due to indirect emissions (Scope 3) from the construction and maintenance of  
493 data centers [46]. Their reported Scope 1 and 2 emissions decreased by 6.3% in the same period.  
494 Microsoft has started to consider a [nuclear energy strategy](#) to meet potential increases in energy  
495 demand due to expanding data centers and the added load of AI systems on their servers [46].

496 Data centers generate heat, creating a need for cooling systems to prevent overheating. These  
497 cooling systems work continually, even in the most advanced and energy-efficient data centers. It is  
498 estimated that 25-40% of electricity demand from data centers is tied to cooling systems [70].  
499 Attempts have been made to address this system, such as redirecting the heat generated from data  
500 centers to heat homes or to generate electricity [61] and even relocating data centers to colder  
501 climates to provide natural cooling [47]. However, such efforts may not be scalable as smaller data  
502 centers may face barriers to transition [71] [47], while the necessary technological and physical  
503 restructuring to execute such transformation also creates its own impacts [27].

504 **Impacts on water use**

505 Activities involved with sourcing material for technological devices, maintenance of data centers, and  
506 production of devices impact water use. The impact of mining on water consumption has long been  
507 noted [3] [16] [29] [38] [40].

508 Digitalization's most substantial water consumption impacts outside of water impacts from mining are  
509 tied to the maintenance of data centers. Cooling systems to prevent overloading servers, data storage  
510 systems, and routers rely on water use, which has impacts on water resources and security. Up to 9  
511 liters of water is evaporated for every kWh of energy used in data centers [29]. One unrealized data  
512 center project in Luxembourg would have consumed up to 10 million liters of water per day, around  
513 10% of the water consumption of the entire country [42]. Utah Data Center, used by the US National  
514 Security Agency, consumes 6.4 million liters of water daily, contributing to water shortages when  
515 combined with periods of drought [63] [34].

516 **Land impacts**

517 Data centers create land use impacts due to their size, as their maintenance requires both physical  
518 technology and infrastructure to accommodate various technology combinations, such as cooling  
519 systems, servers, and backup energy supplies.

520 For instance, the Switch SuperNAP data center operates from a campus spanning a 190,000 m<sup>2</sup> field  
521 in Nevada, United States. Another US state, Virginia, has seen the rapid expansion of data centers.  
522 Since 2019, Virginia's number of data centers has risen from 186 to 467, establishing it as the largest  
523 data center market in the United States [74]. Digital Realty operates the largest data center in Virginia,  
524 and it has an allocated size of 278,000 m<sup>2</sup>, with about a third actively used and the rest reserved for  
525 scaling [17]. The largest data center in the world is the China Telecom-Inner Mongolia Information  
526 Park, located in central Mongolia (Moss 2022). The project plans for the complex to cover over  
527 1,000,000 m<sup>2</sup>, including the machinery to run its cloud services, call centers, warehouses, offices, and  
528 living areas [49]. The construction of the Inner Mongolia Information Park involved converting land  
529 that was primarily used for farming and livestock grazing. This land conversion has affected local  
530 communities and livelihoods, particularly as the area is still home to various ethnic herder groups.

531 **Figure 6. Data center complexes in Virginia. The left image depicts a data center with land**  
532 **conversion and deforestation. The right image shows data centers located in Virginia [8]**



533

534 However, the majority of land use impact of digitalization happens in the production phase of  
535 electronic technology. According to a study on the German electronics industry's entire value chain,  
536 almost 90 % of land change and occupation occurs at the resource extraction level [51] [42].

### 537 **Impacts on waste**

538 Digitalization creates waste impacts by driving up demand for technological equipment. The wider  
539 adoption of digital technologies has been noted as a driver of higher turnover rates for technological  
540 hardware (German Advisory Council on Global Change 2019). High product innovation rates in digital  
541 services encourage hardware replacement as more advanced software requires increased  
542 computational power to function. The median lifespan of a mobile phone was almost five years  
543 between 2000-2005 [5]. Within a decade, this decreased by half, around 2.5 years, with an average  
544 retention rate<sup>8</sup> of less than two years [9].

545 Shorter lifespans and more frequent upgrading of technological devices contribute to more than 62  
546 million tons of global electronic waste generated annually [69]. Total e-waste has increased by 82%  
547 since 2010, with projections up to 82 million tons by 2030, which would be another 32% increase [69].  
548 Current efforts are insufficient to meet the growing consumption rates of electronic devices, with  
549 electronic waste rising five times faster than e-waste recycling [69].

### 550 **Waste reduction, energy efficiency via circular economy**

551 Digitalization can facilitate positive environmental impacts by supporting various aspects of the  
552 circular economy – defined as achieving resource efficiency and economic processes related to  
553 lowering the rates of natural resource extraction and use throughout the value chain – or the transition  
554 towards it [6]. The circular economy is receiving increased policy attention due to its potential to  
555 reduce environmental pressures and reliance on raw materials for sectoral production [53]. However,  
556 the market share of circular business models such as recycling, remanufacturing and repair, sharing

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<sup>8</sup> Number of years before people change their phones.

557 of spare capacity, and the provision of services instead of products is limited [53]. By leveraging  
558 digital technologies like artificial intelligence, blockchain, the IoT, and cloud computing, organizations  
559 can be better positioned to transition to greener models of production and consumption, as well as to  
560 a more resource-efficient and circular economy [53] [6] [76].

## 561 **Impacts on people, including human rights**

562 Digitalization has impacts on people, including on their human rights, through the use of personal data  
563 and human interaction with digitalized services.

### 564 **Risks to rights to privacy and data protection**

565 Despite growing regulations and frameworks, there is still no universally accepted approach to  
566 managing digital data. The United Nations notes the emergence of a 'data market' where companies  
567 collect, trade, and exchange data through third-party brokers. These brokers operate in a space that  
568 is often opaque and unregulated. It will likely take years before clear legislation, let alone a global  
569 agreement, is in place [32].

570 Organizations' data processing, collection, fusion, trading, and usage remain largely opaque [62].  
571 Often, organizations that deploy digital services, such as streaming platforms, online retailers, and  
572 news sites, offer seemingly free services while commercializing personal user communication and  
573 behavior data, which interferes with the right to privacy [18] [68]. Organizational-level decisions  
574 around data processing and trading lack transparency and traceability, and individuals have limited  
575 control over their own data [27].

576 Over the past decade, exposure to sensitive information through leaks, cyber-attacks, or data theft  
577 has affected millions of people. One of the most infamous cases is the Cambridge Analytica scandal  
578 in 2018, where it was exposed that the company harvested the data of approximately 87 million  
579 Facebook users without consent and then sold it to political campaigns [14]. The Equifax data breach  
580 in 2017 compromised the personal information of more than 150 million people, including social  
581 security numbers, addresses, and credit card details [25].

### 582 **Algorithmic risks**

583 Algorithmic risks arise as AI systems operate on the patterns identified in the data they are trained on  
584 without comprehending the underlying context. AI systems have become increasingly effective at  
585 pattern recognition, so when introduced with enough data, they can identify patterns in data based on  
586 the specific algorithm they were built on, which makes training models for algorithms consequential.  
587 AI systems being indifferent to truth leads to what experts call the 'hallucination effect', where AI  
588 systems generate outputs that are not based on reality [33]. Without the ability to independently  
589 assess the validity or the context behind the data, AI systems can perpetuate and even amplify  
590 existing biases.



591 Algorithmic bias and discrimination can occur at various stages of the life cycle of a digital technology.  
592 Bias at the design stage refers to when an algorithmic system is introduced to biased information at  
593 the design level. Incomplete or unrepresentative datasets establish a biased baseline from which an  
594 AI system would emerge, which can lead to discriminatory outcomes in various contexts. For  
595 instance, people can be unfairly rejected from services (banking, healthcare) or employment and  
596 educational opportunities [18], or algorithmic services may produce outcomes that are discriminatory  
597 to marginalized communities [21].

598 Following an audit of a 'decision-support algorithm' used by the child protective services of the Danish  
599 government, researchers found that the algorithm had significant methodological errors, generated  
600 inconsistent child-at-risk scores, and exhibited age-based discrimination. The authors conclude that  
601 such algorithms should not be deployed in local governance functions [48].

602 Private sector organizations, which are in charge of AI innovation and development, do not disclose  
603 sufficient information on their algorithms, citing trade and commercial sensitivities or claiming that  
604 data on the public internet can be used for commercial purposes. Despite the early steps in regulating  
605 this field, no meaningful or common action guidelines have yet been established [10].<sup>9</sup>

## 606 **Assessing GRI Standards against digitalization** 607 **impacts**

608 The previous section sought to provide a general account of digitalization's potential and actual  
609 impacts. This section will review the current GRI Standards against these impacts to assess potential  
610 reporting gaps.

### 611 **Impacts on the economy**

612 Regarding impacts on productivity, the following Topic Standards could apply:

- 613 - **GRI 203: Indirect Economic Impacts** – contains a disclosure on *significant indirect*  
614 *economic impacts*, which include 'changes in the productivity of organizations' or economic  
615 impacts of improving or deteriorating social or environmental conditions, which can capture  
616 productivity impacts due to wider adoption of digital technologies. However, reporting  
617 guidance that expands this expectation can be formulated. Also noteworthy is the ongoing  
618 project on economic impacts.
- 619 - **GRI 206: Anti-competitive Behavior** – contains a disclosure on legal actions for anti-  
620 competitive behavior, anti-trust, and monopoly practices, which can capture monopolistic and  
621 predatory behavior by major technology companies. For instance, Google's legal case would  
622 have to be disclosed under this disclosure.

623 Regarding impacts on employment and workers, the following Topic Standards could apply:

---

<sup>9</sup> [Digitalisation and Responsible Business Conduct – Stocktaking of policies and initiatives](#) provides an overview of most of the early regulatory steps.

- 624 - **GRI 401: Employment** – contains disclosures on new employee hires and employee  
625 turnover, as well as benefits provided to workers, such as parental leave, life insurance,  
626 disability coverage, and retirement provision, among others. In its current form, this Standard  
627 contains no disclosures that can be directly linked to digitalization. GRI 3-3 can, to an extent,  
628 capture the negative impacts created by the adoption of automation or other new  
629 technologies. However, there are no specific disclosures on company policy to address  
630 concerns related to the growing adoption of digital technologies and the workforce resilience  
631 against it.
- 632 - **GRI 402: Labor/Management Relations** – contains a disclosure on minimum notice and  
633 consultation on operational changes, which could include changes due to automation and  
634 digitalization. However, this is not explicitly mentioned in the Standard, so additional reporting  
635 guidance would be needed.
- 636 - **GRI 404: Training and Education** – contains a range of disclosures on training and  
637 upgrading employee skills and performance reviews, which are crucial for workforce  
638 adaptation to new technologies. These disclosures are framed in a way that can capture  
639 training programs that aim to prepare the workforce for automation and digital transformation.  
640 However, no disclosures require reporting on company-provided training programs related to  
641 digitalization and automation or preparing employees to transition into new roles created by  
642 these technologies. For instance, no specific disclosures exist on reskilling employees to  
643 obtain digital skills. However, the framing of ‘Disclosure 404-2 Programs for upgrading  
644 employee skills and transition assistance programs’ can also be interpreted to include  
645 transitions due to digitalization. More concrete disclosures can be formulated on commitments  
646 to assisting, supporting, and preparing workers whose future in the organization may be  
647 jeopardized by digitalization and automation.

648 However, the ongoing revision and update of labor-related Standards have revamped the reporting  
649 expectations around digitalization impacts on workers. The proposed changes address various  
650 aspects of digitalization that can have impacts on workers, such as employee data protection and  
651 privacy and up-skilling and re-skilling of employees who were affected by significant organizational  
652 changes.

653 The revised draft Standards now have both topic management and topic disclosures on the handling  
654 of personal data by employers, including disclosures on several key issues identified in this research  
655 paper:

- 656 • Incidents relating to non-compliance or the unauthorized disclosure of private data of  
657 employees and workers who are not employees.
- 658 • Personal data protection and privacy policies.
- 659 • Obtaining explicit consent related to data processing and monitoring activities from  
660 employees and workers who are not employees.

661 **Environmental impacts**

662 The GRI Standards contain a robust set of Topic Standards covering various environmental impacts,  
663 including *GRI 305: Emissions*, *GRI 302: Energy*, *GRI 303: Water and Effluents*, and *GRI 306: Waste*.  
664 These Standards are comprehensive enough to capture the environmental impact of digitalization,  
665 particularly as it relates to energy and water use, land use change due to the growing number and  
666 size of data centers, emissions, and electronic and digital waste generation and management.

667 **Human rights impacts**

668 Regarding potential negative impacts on the right to privacy, data protection, and cybersecurity,  
669 including asset protection, the following Topic Standards may apply:

670 - **GRI 418: Customer Privacy** – contains a single disclosure of identified cases of loss or theft  
671 of customer data. However, it is not detailed enough to satisfy reporting needs on the  
672 complex data privacy and governance landscape. It lacks reporting requirements on data  
673 protection and privacy matters for stakeholders beyond customers, such as employees and  
674 other partners in the supply chain. It also contains no disclosures on preventive measures  
675 being taken by an organization to ensure data privacy and asset security in cyberspace.  
676 There is also a need for disclosure on third-party data management, as companies outsource  
677 data management, storage, and processing services to third parties. There are also no  
678 disclosures on the obligations of companies to bolster cyber security or any measures in  
679 place to stress test defenses against cyber-attacks.

680 Furthermore, the regulatory landscape has surpassed the requirement level in *GRI 418*. For  
681 instance, a GDPR-compliant organization would already report this information, meaning that  
682 this Standard would not be relevant for the reporting organization because it asks for fewer  
683 requirements. *GRI 418* needs an update to appropriately reflect all the major regulatory  
684 developments on data protection and cyber security matters. Instead of updating *GRI 418*, a  
685 more comprehensive digitalization standard could eventually be developed to represent the  
686 potential negative impacts that cannot be adequately reported in the current Standard.

687 - **GRI 417: Marketing and Labeling** – contains disclosures to ensure fair and responsible  
688 practices when organizations interact with customers through their marketing and labeling  
689 activities. ‘Disclosure 417-3 Incidents of non-compliance concerning marketing  
690 communications’ requires an organization to report the total number of incidents of non-  
691 compliance with regulations and voluntary codes of conduct concerning marketing  
692 communications. Considering the substantial use of digital tools for marketing purposes, for  
693 instance, in developing marketing strategies, using online platforms to carry out campaigns,  
694 and for targeted advertising, this Standard should be bolstered to create reporting  
695 expectations on the use of algorithmic systems for targeted advertising and use of customer  
696 data to create consumer profiles.

697 - **GRI 2: General Disclosures** – contains ‘Disclosures 2-25 Processes to remediate negative  
698 impacts’ that provide space for reporters to discuss their policy or strategy to address

699 grievances due to cyber security breaches leading to loss or theft of data or assets. However,  
700 no clear link establishes a cyber security breach as a negative outcome to be remediated.

701 - **GRI 410: Security Practices** – is relevant as nearly all organizations using digital services  
702 need third-party cybersecurity services to ensure the information and, at times, assets are  
703 safe from cyber-attacks. However, the Standard is not equipped to create robust reporting on  
704 cybersecurity practices since the only disclosure is on human rights training of on-site security  
705 personnel.

706 Regarding negative impacts arising from AI use, such as algorithmic bias and discrimination, *GRI*  
707 *405: Diversity and Equal Opportunity* can apply as it relates to employment and not to other  
708 consequences of algorithmic bias.

709 Other human rights infringements across different AI use cases must also be considered. For  
710 instance, rapid technological advancements reduced the costs of implementing surveillance  
711 technologies, which can be deployed in ways that violate the right to privacy. The rise of social media  
712 platforms created new forms of online harassment and bullying and enabled the rapid dissemination  
713 of disinformation and hate speech. Integrating biometric technologies in governance and other types  
714 of service provision can create circumstances that lead to human rights violations. Users may deploy  
715 AI tools in ways unintended by their developers, leading to unintended negative impacts. The analysis  
716 of the current GRI Standards shows that these are not equipped to address the growing human rights  
717 considerations.

718 The assessment of existing GRI Standards offers an overall mixed picture regarding the broad  
719 impacts of digitalization. Environmental and economic Topic Standards are robust and  
720 comprehensive, and given the ongoing update of economic impact and labor Standards, it is possible  
721 to capture digitalization impacts under these categories. The reporting gap is substantial enough to  
722 warrant a revision of existing relevant Topic Standards regarding the more unique impacts of  
723 digitalization, such as questions around data privacy and security and AI use. While some unique  
724 aspects are covered, existing disclosures need to be consolidated, reporting expectations need to be  
725 increased, and new disclosures addressing AI development and deployment need to be developed.  
726 The current GRI Topic Standards are too thematically remote from the unique human rights issues  
727 posed by AI and other emerging disruptive technologies. AI use disclosures need to be developed to  
728 address this gap.

## 729 **Current reporting expectations on digitalization** 730 **impacts**

731 Reporting expectations on digitalization impacts are still in the early phases of definition, although the  
732 regulatory landscape is rapidly evolving. The existing reporting tools can better capture some impact  
733 areas tied to digitalization. These areas are primarily tied to impacts on the environment, including but  
734 not limited to emissions, energy and water use, land change, and waste. Sustainability reporting

735 frameworks on data security and privacy, use of AI, and cybersecurity are less defined and only  
736 partially covered by a patchwork of industry-specific standards. On the use of AI, no widely agreed-  
737 upon framework that sets disclosure expectations was found. A systemic review of reporting  
738 organizations in Western Europe identified no reference to a framework or reporting standard  
739 regarding voluntary disclosures on AI use, suggesting a significant gap [11].

740 This analysis included a review of ESRS, SASB, and CDP Standards, among the leading  
741 sustainability reporting frameworks. ESRS, given its recent launch and having published its first set of  
742 standards in December 2023, currently has no digitalization standard. Due to its focus on  
743 environmental components of sustainability, CDP also has no specific disclosures on the impacts of  
744 digital technologies. SASB, on the other hand, produced a standard targeting the software and  
745 information technologies industry. The standard focused on the emerging impacts of data privacy and  
746 security, the environmental footprint of digital technologies, intellectual property protection, and  
747 competitive behavior, as well as managing systemic risks posed by disruptions to digital technologies  
748 and services.

749 Given that SASB produced an industry-specific standard, more frameworks, guidelines, regulations,  
750 and other authoritative sources on various impacts associated with digitalization that GRI Standards  
751 do not already cover were reviewed. This was done to get a better thematic understanding of how  
752 issues around digitalization are covered under international authoritative sources that are not  
753 reporting standards. Therefore, this section includes a review of five authoritative sources chosen for  
754 their relevance and because these have informed legislation, policy, guidelines, and reporting  
755 expectations globally. These instruments are described and discussed as possible reporting  
756 expectations that can be derived from existing frameworks.

### 757 **SASB Software and IT Standard**

758 The closest equivalent of a digitalization standard within the current SASB framework is a standard  
759 that targets organizations in the software and IT services industry. SASB specifically describes  
760 organizations in this industry as those offering 'products and services globally to retail, business and  
761 government customers, and include entities that develop and sell applications software, infrastructure  
762 software and middleware' [58].

763 SASB identifies six topics for software and IT industry organizations to consider when disclosing  
764 information about sustainability-related risks and opportunities. These include:

#### 765 - **Environmental footprint of hardware infrastructure**

766 Specific disclosures on:

- 767 1) total energy consumed;
- 768 2) total water withdrawn, consumed, including percentage of each in regions with high or  
769 extremely high baseline water stress; and
- 770 3) integrating environmental considerations into strategic planning for data center  
771 needs.

- 772 - **Data privacy and freedom of expression**  
773 Specific disclosures on:
- 774 1) policies and practices relating to targeted advertising and user privacy;
  - 775 2) number of users whose information is used for secondary purposes;
  - 776 3) total amount of monetary losses as a result of legal proceedings associated with user  
777 privacy;
  - 778 4) number of law enforcement requests for user information, including percentage  
779 resulting in disclosure of information; and
  - 780 5) list of countries where core products or services are subject to government-required  
781 monitoring, blocking, content, filtering, or censoring.
- 782 - **Data security**  
783 Specific disclosures on:
- 784 1) number of data breaches, including number of users affected; and
  - 785 2) description of approach to identifying and addressing data security risks, include use  
786 of third-party cybersecurity standards.
- 787 - **Intellectual property protection and competitive behavior**  
788 Specific disclosure on:
- 789 1) total amount of monetary losses as a result of legal proceedings associated with anti-  
790 competitive behavior regulations.
- 791 - **Managing systemic risks from technology disruptions**  
792 - **Recruiting and managing a global, diverse and skilled workforce**  
793 The SASB industry standard does not present a direct match with a potential Topic Standard  
794 on digitalization, as the GRI Standard would not be sector focused. However, reporting  
795 expectations in the SASB standard align well with broad stakeholder expectations around  
796 digitalization impacts, as these impacts create financial risks and opportunities for the  
797 reporting organization.

## 798 **OECD Guidelines for Multinational Enterprises on Responsible Business Conduct**

799 The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct are  
800 recommendations addressed by governments to multinational enterprises to enhance the business  
801 contribution to sustainable development and address adverse sustainability impacts associated with  
802 business activities.

803 The 2023 update to the OECD Guidelines brought about a significant change in the due diligence  
804 expectations regarding the use of technology. The updated guidelines now impose new due diligence  
805 expectations on the development, financing, sale, licensing, trade, and use of technology, including  
806 gathering and using data. Any enterprise engaged with digital technologies is thus expected to carry  
807 out risk-based due diligence with respect to actual and potential adverse impacts related to science,  
808 technology, and innovation. They must also ensure transparency around data access and sharing  
809 arrangements and adopt responsible data governance practices. The inclusivity here suggests that all

810 organizations can be considered technology companies, as almost all entities in OECD countries  
811 leverage technology to some extent in their operations.

812 Furthermore, the OECD adopts a holistic and inclusive approach to capture the evolving nature of  
813 technologies. This would align with a topical approach to a digitalization standard from the perspective  
814 of GRI, as all reporting organizations would need to consider the broader impacts of their use (or  
815 transition towards) digital technologies as part of their materiality assessment.

#### 816 **OECD Recommendation on Artificial Intelligence**

817 Recognized as the first international and intergovernmental standard for using AI, the  
818 recommendation has informed various frameworks, guidelines, and principles since its release in  
819 2019. This recommendation sets various expectations on all 'AI actors', defined as 'those who play an  
820 active role in the AI system lifecycle, including organizations and individuals that deploy or operate AI'  
821 [54]. This also suggests a sector-agnostic approach that puts responsible business conduct  
822 expectations on not only the developers but also the users of AI systems. The principles focus on  
823 transparency and explainability regarding AI systems, as well as safe AI use and ensuring  
824 accountability, which implies more expectations for disclosure. These could include:

- 825 - **Transparency and explainability:** AI actors may be required to disclose more information  
826 about how their AI systems function and the degree of autonomy the system operates under.
- 827 - **Changes during the AI system lifecycle:** AI actors may need to inform stakeholders about  
828 potential risks and changes arising from regular maintenance, data collection, testing,  
829 deployment, and decommissioning throughout an AI system's lifecycle.
- 830 - **Safety and risk management:** AI actors may expect to disclose the safety measures and  
831 protocols in place, especially in cases where AI systems might cause harm or exhibit  
832 unexpected behavior. This might also involve disclosures related to the override mechanisms  
833 or the conditions under which an AI system can be decommissioned.
- 834 - **Transparency of data sources for AI training purposes:** AI actors may need to report on  
835 the data sources used for training AI systems. To determine intellectual property concerns,  
836 this would include whether the data was obtained from open-access materials, copyrighted  
837 content, or user-generated content. If training data includes content subject to intellectual  
838 property rights, AI actors would need to report whether proper licensing agreements are in  
839 place and ensure that the use of such data is lawful.
- 840 - **Intellectual property rights compliance:** AI actors may need to demonstrate compliance  
841 with intellectual property laws in their country of operation and disclose how they manage the  
842 use of copyrighted materials while training AI systems.
- 843 - **User consent:** AI actors may need to inform users of their products that the data users  
844 produce by interacting with services is used to train generative AI systems.

#### 845 **General Data Protection Regulation (GDPR)**

846 The GDPR is a comprehensive data protection legislation developed by the European Union to  
847 protect user privacy and data online within the European Union. It sets requirements for organizations

848 on how they collect, process, store, and share personal data, emphasizing principles such as  
849 lawfulness, fairness, transparency, data minimization, and accountability [24]. GDPR has been a  
850 global benchmark for digital privacy and data protection as it informed regulations in other regions and  
851 influenced how organizations approach data management and collection. The requirements to be  
852 'GDPR compliant' are substantial and comprehensive. The ripple effects of GDPR have elevated  
853 reporting expectations by any organization that engages with online users. These expectations  
854 include but are not limited to:

- 855 - **Requirements relating to the processing of personal data:** data must be processed  
856 lawfully, fairly, and transparently, including the informed consent of data subjects (users).
- 857 - **Purpose limitation and data minimization:** personal data must be collected for specified,  
858 explicit, and legitimate purposes and not further processed in a manner that is incompatible  
859 with those purposes.
- 860 - **Privacy and confidentiality:** personal data must be processed in a way that ensures  
861 appropriate security, including protection against unauthorized or unlawful processing and  
862 accidental loss, destruction, or damage.
- 863 - **Transparency expectations around processing, sales, copying, and storing data:** data  
864 collectors must provide data subjects with information when their data is collected. This  
865 includes details such as the data controller's identity, the processing purpose, the legal basis  
866 for processing, and any data recipients.
- 867 - **Right to access:** data subjects have the right to request and obtain information about  
868 whether their data is being processed and, if so, to access the data and obtain additional  
869 details like the processing purpose, the personal data categories, and the data recipients.
- 870 - **Third-party data sharing** – if a user's data is shared with third parties, the data controller  
871 must inform the data subject about the recipients of the personal data. This applies to the sale  
872 of data as well.
- 873 - **Data security management policy:**
  - 874 ○ **Data protection by design and default:** this principle refers to incorporating data  
875 protection measures into the design of systems and processes.
  - 876 ○ **Data protection officer:** some organizations are expected to appoint a data  
877 protection officer to ensure compliance with GDPR.
  - 878 ○ **Data transfers:** the GDPR imposes restrictions on transferring personal data outside  
879 of EU jurisdiction, which allows transferring user data only to countries deemed to  
880 provide adequate data protection.

## 881 EU AI Act

882 The first international regulatory attempt on AI, the EU AI Act, was approved by the European  
883 Parliament in March 2024 [23]. The major contribution of this document is that it is the first of its kind  
884 as a legal framework on AI, which sets requirements and obligations regarding AI use for both AI  
885 developers and deployers. It also establishes a risk-level typology for AI systems and sets  
886 expectations on the type of AI system used based on the risks it poses:



- 887 - **Unacceptable risk:** The highest risk level refers to AI systems such as social scoring and  
888 categorization of people. At this level of risk, the EU intends to ban these AI systems.
- 889 - **High risk:** AI systems used in specific areas such as the operation of critical infrastructure,  
890 access to essential services, employment (including CV-sorting software during recruitment  
891 processes), credit scoring, migration, asylum, and border control management. The  
892 developers and deployers of such capabilities will have to satisfy risk assessment and  
893 mitigation system requirements, ensure high-quality training data and traceability, and ensure  
894 a high level of robustness and security.
- 895 - **Limited risk:** Defines the need for transparency in AI tools that pose a limited risk, such as  
896 chatbots and generative AI. Developers and users of these tools must comply with  
897 transparency requirements to disclose when AI's content was generated and copyrighted data  
898 used for training AI systems.
- 899 - **Minimal or no risk:** AI tools that pose little to no risk, such as those used in video gaming or  
900 spam filters, will be used freely.

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901 **Conclusion**

902 This research concludes that digitalization's impacts on the environment and the economy are  
903 conditional. Intervening factors could play a role in determining the impact of digitalization in achieving  
904 sustainable development. A widespread agreement has been established, at least from the  
905 perspective of governments and international organizations, that digital transformation has the  
906 potential to bring about substantial change and advance sustainable development. However, this  
907 promise, at least from an environmental sustainability perspective, has yet to bring any tangible break  
908 from existing, resource-intensive ways of production and consumption. On the contrary, available  
909 evidence suggests a negative trend, with substantial increases in e-waste, energy, and water use by  
910 data centers already pushing major tech companies away from their emissions reduction  
911 commitments, underlining the importance of reporting on impacts around digital transformation.

912 Nevertheless, nearly all organizations have either already fully transformed digitally or are in the  
913 process of defining the depth of digital change they want to undertake. This will create ripple effects  
914 across the economy and the environment, as the reliance on the physical infrastructure of digital  
915 technologies will markedly increase over the next few years, exacerbating the negative impacts of  
916 data center maintenance. GRI will likely need to confront growing challenges in sustainability  
917 development brought about by the ever-expanding digital world.

918 While impacts on the economy and the environment can be captured in the existing GRI framework,  
919 more reporting guidance on relevant Topic Standards could connect digitalization impacts to wider  
920 sustainability impacts. The relevant Topic Standards address emissions, energy, water, waste, labor,  
921 and economic impacts. Regarding the other unique impacts of digital technologies, such as AI  
922 development and use, algorithmic decision-making, data privacy, and security, a substantial reporting  
923 gap is observed, enough to warrant a revision of the relevant Topic Standards.

924 It is also found that AI systems are being adopted and new AI-based services are rapidly emerging.  
925 This is followed by considerations for the broader uptake of AI systems on the rule of law and various  
926 potential infringements on human rights through algorithmic bias and discrimination. With algorithmic  
927 data processing capabilities rapidly increasing, setting reporting expectations around AI use aligned  
928 with emerging international standards and guidelines remains paramount. With generative AI  
929 capturing attention and investment, the risk of market concentration by big technology firms, as well  
930 as various implications on information ecosystems, also needs to be considered.

931 Globally, a rapidly evolving regulatory landscape is shaping the future of digital transformation, with  
932 efforts across various jurisdictions aimed at influencing its direction. It is evident that not only GRI but  
933 also other internationally recognized sustainability reporting frameworks are lagging in setting  
934 reporting expectations around the adoption of digital technologies and the implications this transition  
935 brings. GRI could leverage this gap by setting clear reporting expectations around digitalization  
936 impacts. GRI's global outlook also enables it to address digital technologies' disconnected and  
937 dispersed nature.

938 This paper establishes some research gaps, for instance, regarding sectoral differences in  
939 digitalization impacts, reporting activities of technology firms, and reporting in sectors with a larger  
940 adoption rate of digital technologies. The first gap arises from scoping. The adopted scope enabled a  
941 sector-agnostic approach but prevented a thorough exploration of the sectoral implications of  
942 digitalization. The second gap regarding research on reporting activities around digitalization can be  
943 pursued based on feedback from the GSSB and emerging research needs.

944 The following section includes five actionable recommendations that the GSSB can consider. The  
945 proposed recommendations are not mutually exclusive and contain a range of actions that aim to  
946 address emerging reporting needs around digitalization impacts.

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947 **Recommendations**

- 948 1) **Pursue a digitalization project** – In light of the assessment of GRI Standards and a review  
949 of the emerging regulatory and policy landscape on digitalization impacts, it is proposed that  
950 the GSSB consider pursuing a digitalization project to reflect the current Standards' reporting  
951 needs. Topic Standards identified as needing an update are *GRI 405 Diversity and Equal*  
952 *Opportunity*, *GRI 406: Non-discrimination*, *GRI 417 Marketing and Labeling*, and *GRI 418:*  
953 *Customer Privacy*. The project should consider revising these Standards to address aspects  
954 of digitalization that the current GRI framework omits, including data governance,  
955 cybersecurity, and AI adoption.
- 956 2) **Mainstream digitalization in other Topic Standards** – This would require integrating  
957 impacts that arise from adopting digital technologies not only from a data governance and  
958 cybersecurity perspective but also to allow for integrating environmental and economic  
959 impacts more clearly. For instance, the ongoing revision of the pollution-related GRI  
960 disclosures can consider the environmental impacts associated with maintaining the digital  
961 world, such as high reliance on water and energy to sustain data centers. Regarding ongoing  
962 projects such as labor and economic impacts, the respective working groups can consider the  
963 relevant categories of impacts identified in this paper. Integrating impact considerations in  
964 new GRI Standards projects would help SMEs and non-tech organizations using digital  
965 technologies to address digitalization impacts during their materiality assessments.
- 966 3) **Consider sector-specific impacts** – Following up on our current research on the broader  
967 impacts of digitalization, sector-specific research is proposed for consideration, as each  
968 sector has unique characteristics, capacities, and opportunities that influence how  
969 digitalization unfolds. Digitalization can have different impacts on sectors depending on their  
970 level of technological adoption, regulatory environment, and market dynamics. Also, sectoral  
971 differences can mediate where impacts occur along the digitalization value chain. For  
972 instance, in manufacturing, digitalization might focus on automation and the IoT, while in  
973 finance, it might center on blockchain, big data analytics, AI-driven analytics, and customer  
974 services. Sector-specific research helps identify these unique factors that would inform  
975 decision-making. Conducting sector-specific research on the tech industry is also important,  
976 as it is the digital service provider to the economy. Additionally, most environmental impacts  
977 arise within the tech sector, particularly through the maintenance of digital infrastructure.
- 978 4) **Produce other documents** – Producing documents or resources such as reporting  
979 guidance, publishing research papers, discussion notes, and training material could also help  
980 non-tech or smaller organizations better understand the implications of their choices in  
981 adopting digital technologies.
- 982 5) **Monitor the evolving policy landscape** – In light of the rapidly evolving regulatory, policy,  
983 and reporting landscape around digitalization, continued monitoring of this landscape should  
984 be considered. Staying informed about regulatory developments is crucial for GRI's strategic  
985 positioning and adaptation in the face of policy shifts. This could be done by collaborating with  
986 GRI's policy, Standards, and research functions.

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