

# The decision by management to disclose environmental information: A research note based on interviews

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## Abstract

The question that was considered in this research was why management discloses environmental information given the fact that it is not required by law in South Africa.

The person closest to the decision to report environmental information and the decision of what type of environmental information to report, in six different organisations, were interviewed using a questionnaire consisting of open-ended questions. The responses were analysed for commonality.

Although respondents seldom explicitly referred to pressure, it was clear that this was a major reason for environmental disclosure. Some of the reasons for reporting that was heard often were accountability, transparency, peers did it and to stop the bad news reported by others. The fact that external pressure plays such a large part in the disclosure decision reminds one of legitimacy theory.

## Key words

*Environmental reporting*  
*Environmental accounting*

## 1 Introduction, problem statement and outline of the paper

Environmental reporting is regarded as an integral part of most formal environmental management systems. The reporting may be internal (aimed at management) or external (aimed at other stakeholders). The most important environmental management system from a South African perspective is the International Organization for Standardization's environmental management system, the ISO 14000 series of standards.

South African companies with clients in European countries, particularly Germany, are often required to prove their commitment to proper environmental management by ISO certification. In the ISO 14000 series, both internal and external reporting is recommended, but the details of what to report is left up to each organisation depending on their specific circumstances. However, according to ISO 14004 (1996:18) the following items "can be included in reports:

- Organisation profile;
- Environmental policy, objectives and targets;
- Environmental management processes (including interested party involvement and employee recognition);
- Environmental performance evaluation (including releases, resource conservation, compliance, product stewardship and risk);
- Opportunities for improvement;
- Supplementary information, such as glossaries; and
- Independent verification of the contents."

The recommendation to report found in ISO 14000 is not compulsory even if the organisation is pursuing the standard. There are no other environmental reporting requirements in South Africa either.<sup>1</sup> There are, for example, no requirements in the Companies Act or in the Accounting Standards regarding environmental reporting. In effect, most environmental disclosure is made on a voluntary basis in South Africa. This begs the question why management discloses environmental information at all, since there must be some financial implication to reporting (the cost of collecting and collating information and of disclosing it, mostly in print form). Management has to perceive some benefit from such disclosure.

Although there is no legislation or generally accepted accounting practice (GAAP) standard that relate specifically to the disclosure of environmental information, it may sometimes be necessary to disclose environmental information in order to comply with GAAP. For example, a contingent liability (where the contingency is environment related) has to be disclosed. The lack of legislation and standards for reporting has led to an "environmental reporting expectations gap" in Australia (Rankin 1996; Deegan & Rankin 1999), where stakeholders require more information than they are getting. This may well be the case in South Africa too.

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<sup>1</sup> This lack of legal or other reporting requirements for environmental information is also the case in Australia (Deegan 1996:125).



The disclosure of information can be enforced through various mechanisms. In South Africa, the constitution grants an individual access to certain information, such as any information that may reasonably be assumed to have a bearing on such an individual's health. Certain laws also pertain to access to information, either directly or indirectly. An example of an indirect requirement of law is where the Companies Act states that the annual financial report should comply with GAAP. There is a view that the accounting standards set by the South African Institute of Chartered Accountants (SAICA) constitute GAAP, but if a company can prove that their methods of accounting is generally accepted, then they probably do not have to comply with the standards.

Although the disclosure of environmental information is an entirely voluntary process in South Africa, reporting is increasingly popular among companies and other organisations (De Villiers & Visser 1998).<sup>2</sup> The fact that users regard environmental information as material to their financial decision-making (Deegan & Rankin 1997) may be one of the reasons. However, because the collection, collation and reporting of any kind of information has monetary implications, companies and organisations presumably have good reasons for reporting information on a voluntary basis. The aim of this paper is to find out what these reasons are.

The rest of the paper is organised as follows: a section on the method is followed by one on the development of the questionnaire. The results are discussed in the next section, with a final section for the summary and conclusions.

## 2 Method

The best method for determining someone's motives is probably to ask them what they are. Any alternative method would of necessity include some element of guesswork. Even asking someone may not always yield a completely honest response. However, such is the nature of the interview approach. Although there is an element of risk that the true motive is not given, asking the incumbent remains the most direct approach, as there are no independent source for ascertaining the true motive. The direct method is used in this survey.

The decision to disclose and what to disclose was to be examined and, therefore, it was decided to interview the person in the organisation responsible for the decision to report and for the decision of the content of the disclosure. In practice this often meant the person in a position of

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<sup>2</sup> The increased popularity is also found elsewhere in the world (Mathews 1997).

“most” responsibility or the person responsible for the first draft of the environmental information disclosed.

An important step in the research process was to decide which organisations to include. If organisations with little or no disclosure was included, the reasons for disclosing may be ill defined or unknown. Perhaps the management of such organisations has not really considered the issue at all and this would render an interview with such officials meaningless. It was therefore decided to include only organisations known for good environmental disclosure.

There are two South African environmental reporting awards. One for disclosure in the annual report (KPMG/University of Pretoria Awards) and the WWF(SA) Awards for best disclosure in separate environmental reports. Each awards a first, second and third place each year. The decision was made to include the winners of both types for the latest year (1998). This meant that six “most” responsible individuals could be identified and interviewed. The six organisations consisted of two public utilities and four listed (or publicly traded) companies.<sup>3</sup>

One could argue that six is a low figure for an interview approach, but the decision was made to include only the original six organisations for three reasons. First, there appeared to be no way of identifying additional organisations that met the requirement for “good” environmental disclosure. Second, South African environmental reporting is not ubiquitous (De Villiers & Visser 1998) and the aim was to include only organisations with proper and well-defined disclosure. Increasing the scope of the survey created the possibility of having to include organisations with lesser records in this regard. Third, this paper is of an exploratory nature and six was deemed to be enough for the limited ambitions of the paper. It was felt that the lessons learnt from this round of interviews will assist in improving future efforts. Six interviews may even be considered enough if it is taken into account that O'Donovan (1997) did only seven interviews in his study of the importance of legitimacy as motivating force in corporate environmental reporting.

As this survey is regarded as exploratory in nature, no specific theoretical framework is suggested. The research is aimed at surveying the prevalent ideas (possibly theories?) managers subscribe to. This kind of approach has

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<sup>3</sup> The public utilities were Eskom and Umgeni Water. The listed companies were Samancor, Sasol, TransNatal and Western Deep.



been taken in prior environmental reporting research (Deegan & Rankin 1999:315).

A questionnaire was developed for the interviews, but the questions were specifically left open-ended and respondents were allowed to elaborate as much as they wished to. The interviews were undertaken during January 1999.

### **3 The development of the questionnaire**

The aim of the questionnaire was to get as much information as possible from the interviewee without being too restrictive. Being restrictive would nullify the advantage of an interview over a structured questionnaire. At the same time, it was deemed important to obtain the interviewee's response to certain possible reasons for disclosure. There may, after all, be many reasons for a particular organisation to regard environmental reporting as advisable. To summarise, the questionnaire was to provide a framework for a discussion without being restrictive.

The first section of the questionnaire concerns the function of organisational reports, specifically the annual report and separate environmental reports. In the second section, the general reason for disclosure is asked. It was anticipated that stakeholders would be named in answering this section. Therefore, the next section deals specifically with stakeholders in an effort to acquire more detailed information on how the organisation views their information rights (if any).

The remaining four sections of the questionnaire deal with specific reasons for environmental reporting previously identified by researchers. The aim was to specifically mention these reasons to ensure that the interviewee's opinion regarding the issue could be captured. These reasons are legitimacy (Lindblom 1994; Gray *et al.* 1995; Brown & Deegan 1998); media agenda setting theory (Brown & Deegan 1998); political events (Walden & Schwartz 1997) and other events (Deegan, Rankin & Voght 1998), such as disasters that was ascribed to specific organisations or industries.

The questionnaire is reproduced in the Appendix at the end of the paper.

### **4 Results and discussion**

The responses were analysed to establish whether common themes emerged and whether certain reasons for disclosure appeared to be more

important than others. The results are discussed under seven sub-headings. Each sub-heading refers to one of the sections in the questionnaire (see appendix).

#### **4.1 Function of reports**

The respondents were in agreement that the function of the annual report is to advise stakeholders regarding the status of the company. They appear to agree that shareholders are probably the most important stakeholder group. This means that financial information predominates, but there is an awareness of a change in annual reports to reflect governance of all issues, including environmental concerns.

Separate reports appear to be the result of a natural progression organisations go through in environmental reporting. The first step is to at least report something about the environment in the annual report. The next step is that the environmental reporting in the annual report expands as stakeholders ask for more and as the organisation feels confident enough to commit to more. After a few years, the extent of the environmental information outgrows the annual report and organisations start reporting by way of separate environmental report. The environmental information in the annual report then becomes an overview of the information provided in the separate report.

According to the respondents, the annual report and the separate environmental report are aimed at different audiences. However, the two audiences show some overlap. Annual reports give precedence to the needs of investors, whereas environmental reports emphasise community and societal information needs. The annual report includes more than just environmental information and, therefore includes only selected highlights and, as one respondent claimed, "lowlights" of environmental performance.

The process of deciding what goes in and what does not, appears to be similar in all six organisations. The "environmental management" staff contributes the section or various bits of information for inclusion in the annual report. They also prepare the "first draft" of the environmental report. These drafts may or may not progress through a committee to be further refined, but ultimately the Chief Executive of the organisation appears to exercise his/her veto if they are not completely satisfied. The Chief Executive appears to be more likely to exercise this kind of veto in a publicly traded company as opposed to a public utility. This could be the result of public company management believing that they have something to loose by indiscriminate disclosure of voluntary information.



## 4.2 General reason of reporting

Many reasons for disclosing environmental information were mentioned, such as:

- It is a national trend and we are following what our competitors are doing ©;
- The community need to know © (accountability);
- Communities are entitled to know © (accountability);
- We aim to be good communicators with the outside world © (accountability);
- We aim to give recognition to employees doing the good work ©;
- We are demonstrating good corporate citizenship © (accountability);
- We want to illustrate good corporate governance © (accountability);
- We are committed to industry standards ©; and
- We want to show what we have achieved, what we are doing and what we intend doing © (accountability).
- We want to inform employees;
- We have to comply with legal requirements (accountability);
- We have to comply with policy requirement;
- By disclosing information, we are preventing incorrect information supplied by others to be believed;

The notation “©” indicates that a company official (not a public utility official) forwarded the particular reason. The word “accountability” in brackets after some of the reasons were added by the author to indicate where the reason given refers to or could refer to the notion of accountability.

The notion of accountability is well developed in the accounting literature (see for example Gray *et al.* 1996; Burritt & Welch 1997; Gray *et al.* 1997). It is, in short, about the information rights of stakeholders and it therefore places a burden on organisations to supply such information as stakeholders regard as important. One expects public utilities to be versed in and to accept such thinking, but from the bullets above (marked accountability and ©) it appears as if the management of publicly traded companies share these views.

## 4.3 Stakeholders

The respondents generally take a broad view regarding the inclusion of stakeholder groups and consider both groups inside and outside of the

organisation to be stakeholders. The general public and local communities (affected by operations) are, for example, mentioned as stakeholders.

The definitions given for the concept of stakeholders are also very broad. One respondent said that a stakeholder is anyone that has an influence on the organisation's licence to operate. However, the following definition can probably be regarded as a composite of the views of the various respondents:

"A stakeholder is anyone who has an interest in the organisation, directly or indirectly, or who is affected by its operations or who affects its operations".

Only one of the six organisations has not performed a formal stakeholder analysis. Four of the other five also have ongoing stakeholder surveys and discussion groups in order to keep a finger on the pulse of public perceptions of their environmental performance.

According to the two utilities, government and their local communities appear to be their most important stakeholders. One of the utilities also mentioned industrial customers (particularly exporters), because they have to, in turn, explain environmental issues associated with their energy supply to their customers.

The officials of the listed companies regarded investors, particularly if they were attempting to attract overseas investors, as the most important and powerful stakeholder group. Customers were also mentioned as an important group. These differences in stakeholder groups between different types of organisations are consistent with the findings of Robertson & Nicholson (1996).

The repeated references to overseas investors and customers appear to indicate that individuals and communities in South Africa's trading partners are more interested in the environmental performance of organisations than South Africans themselves.

Each of the respondents said that stakeholders have a right to social and environmental information from the organisation. This is interesting and potentially very important. If one has the right to information, you do not have to ask for it, you can demand it! The source of this right to information was further probed. Two respondents said that the right to information stems from the constitution where a clean and safe working and living environment is stated as a right. Another respondent thought



that the organisational environmental policy was the basis for information rights, but the most philosophical position was that people had rights because they existed and because they were concerned for their own wellbeing and that of their families.

The respondents appeared to agree that stakeholders could not really demand operational changes. If they had concerns, they would be consulted and attempts would be made at appeasement, but ultimately, the organisation decides what to do and how to do it. Also, stakeholders have an influence, but do not determine what information is disclosed. This would appear to be incongruous with the opinions expressed regarding information rights. As the interesting theories have been proclaimed, it simply boils down to the fact that organisations do as their management please until forced to do otherwise (compare also with who has the ultimate say in what is reported – the Chief Executive).

#### 4.4 Legitimacy

The notion of legitimacy is rather less naive than some other theories in its basic assumption that organisations will only react to a threat to their legitimacy, i.e. reaction will only follow external force. It has been used in research by, for example, Adams *et al.* (1998), Deegan & Gordon (1996) and Brown & Deegan (1998).

According to Lindblom (1994), there are four disclosure strategies organisations can use in order to improve their legitimacy. They can report in order to:

Educate and inform the public about actual changes in environmental performance and activities;

1. Change their perception without performance and activities;
2. Manipulate perception by concentrating on good news and ignoring any bad environmental news; or
3. Change external perceptions of what the organisation is responsible for or have control over.

The respondents all agreed that they use strategies one and four and they all disagreed that they use strategies two and three. One respondent candidly indicated that it is only human nature to use strategies two and three to a certain degree and although the other vehemently disagreed that they would ever consider such a course of action, one can not help but agree with the first mentioned respondent. I do not thereby doubt the sincerity or the commitment to good environmental management of the organisations to which the respondents belong.

The respondents indicated that their public relations departments did not influence the environmental information disclosed. Their function was to act as a conduit in getting the information out into the public domain.

#### **4.5 Media agenda setting theory**

This theory states in general terms that the media has a profound influence on public perceptions and that they do not just reflect issues of public concern, but that they often create these issues.

None of the respondents believe that media attention alone has ever made them report environmental information. However, they do agree that the media has a major influence on public perceptions, also perceptions regarding their own organisations. They feel that the media sometimes reflects public perceptions, but that it often drives public perceptions.

Most of the organisations tend to respond very rapidly to any negative reports in the media by immediately supplying information about what is being done and what actions are planned to remedy the situation.

#### **4.6 Political environment**

The political changes in South Africa have, according to the respondents, had an effect on pressures on the organisation. There is currently a greater emphasis on openness and transparency than in the past when management decisions were accepted more easily. There has been a shift of power away from industry organisations to labour organisations. Government policy was, for example, in the past almost entirely based on input from industry sources, whereas the industry representation on consultative forums are now small compared to those of other structures. These changes may have influenced environmental reporting substantially. However, these changes coincided with a world-wide trend towards transparency, the emphasis of human rights and increased awareness of the detrimental effects of industry on the natural environment. This makes it difficult to separate the various reasons for the increases in environmental reporting in South Africa (see De Villiers & Visser 1998).

#### **4.7 Events**

Two of the respondents mentioned the Merriespruit disaster. A slimes dam collapsed during the night of 22 February 1994. The result was the flooding of the residential township of Merriespruit with 2 mega tonnes of mud. Seventeen people died and 80 houses were destroyed. The respondents said that the entire mining industry concentrated on waste



management and reporting on this aspect much more after the Merriespruit disaster.

Two of the respondents stated that their first environmental report as an event profoundly influenced their environmental reporting. The change came about as a result firstly of the promises made by the organisation in its environmental report and secondly of the demands stakeholders started to make as a response to the information already disclosed. These respondents feel that the environmental report develops a momentum of its own once it is published. It leads the organisation into new areas of environmental management and it ensures that management honours the commitment made.

## **5 Summary and conclusions**

The reasons for the increase in environmental reporting in South Africa can be related back to the pressure exerted on organisations from outside sources. Organisations would probably not increase their disclosure if it were not demanded.

A number of the reasons for reporting mentioned by the respondents, indicate their commitment to the notion of accountability to all stakeholders (not only shareholders). Other reasons mentioned include:

- following competitors; and
- to prevent others from publishing incorrect information.

Organisations appear to have a broad view of the stakeholders they want to appease. In particular, as one respondent put it, anyone "that has an influence on our licence to operate". Environmental disclosure is used by the organisations in an effort to legitimise their operations and organisations do respond to media attention. They endeavour to manage public perceptions by supplying information to the media as soon as negative issues are mentioned in media reports. The political changes in South Africa have resulted in power shifts and organisations are now expected to operate in a more open and transparent way. Employees and employee organisations have benefited from these changes. Specific events do not appear to have as big an influence on environmental reporting in South Africa as does the general trends towards transparency, accountability and environmental awareness. The publication of a separate environmental report often leads to increases in management commitment and public demands for better environmental management.

There is evidence of differing pressures on listed companies and public utilities. This is specifically evident from the tendency in listed companies that the Chief Executive takes a fairly heavy-handed approach in his right of final decision of what is disclosed, as well as in the most important stakeholders cited. For listed companies, investors predominate, whereas customers and government are considered important by utilities.

In spite of the proclamation of noble motives, it became very clear that organisations respond to pressure. In the absence of pressure, voluntary actions (such as environmental disclosure) are not done. The implication is that individuals and/or groups that consider the advancement of the environmental accounting and disclosure agenda as important, have to muster wider support from government,<sup>4</sup> standard setters and communities to pressurise organisations into better environmental management and reporting. In the words of Bebbington (1997), environmental accounting can achieve this through engagement, education and the inclusion of sustainability issues.

## **APPENDIX – The questionnaire**

### **Questionnaire used in interviews to establish reasons for the disclosure of environmental information in annual reports and in separate environmental reports**

#### **1. FUNCTION OF REPORTS**

- What is the function of the annual report?
- Who are the broad stakeholder groups that constitute the perceived audience of the annual report?
- What is the function of a separate environmental report?
- Are the stakeholder groups the same as for the annual report?
- What environmental information goes in the annual report and what goes in the separate report?
- How is this decision made?
- Who is actually in charge of the decisions as to what ultimately goes in the annual report and the separate report?

#### **2. GENERAL REASON FOR ENVIRONMENTAL DISCLOSURE**

- Why do you voluntarily disclose environmental information?

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<sup>4</sup> Environmental law or the threat thereof has a major impact on company policy development and environmental activity (Tilt 1997:388)



- There are a seemingly infinite number of environmental impacts an organisation can cause. How do you choose which ones to control and report?

### 3. STAKEHOLDERS

- Who are your stakeholders?
- How would you define a stakeholder?
- Have you performed a formal stakeholder analysis?
- If so, explain the process and the outcome thereof.
- Which stakeholder group or groups is/are the most important in terms of your reporting practices?
- Why are they more important than others? Is it something they did or could do? Are they important because they have power, and if so, why do they have power?
- Do particular stakeholder groups demand social and environmental information?
- Why do they want this information?
- Do they have a right to social and environmental information?
- What actually gives an individual or group the right to information?
- Do they have a right to demand changes in your processes if they are not satisfied?
- Do they actually, in practice, determine what gets reported? Do they have a direct or an indirect say?
- How relevant are green groups and other interest groups to your various disclosure and operating decisions?

### 4. LEGITIMACY

- Do you disclose environmental information in order to educate and inform your relevant publics about actual changes in environmental performance?
- Do you disclose environmental information in order to change their perceptions without changing your environmental performance and activities?
- Do you disclose environmental information in order to manipulate perceptions by ignoring or skimming over bad environmental news and concentrating on good news?
- Do you disclose environmental information in order to change external perceptions of what the organisation is responsible for or has control over?
- Are annual reports and other public reports a strategic tool that is useful in impacting the public's perceptions of your organisation?
- What role does your public relations staff have in your disclosure policies?

## 5. MEDIA AGENDA SETTING THEORY

- Do you have a mechanism within your organisation that collects evidence of media attention directed at your organisation or industry?
- Why/why not?
- How do you use this information?
- Are some areas of media attention more sensitive than other, and therefore more likely to generate some form of response from your organisation?
- Is your organisation more concerned about particular media than others, and if so, which ones and why?
- Does media attention have to be of a particular magnitude before you react?
- Do you think that the media can influence public perceptions about your organisation, and on what types of issues?
- If you believe the media is providing an inaccurate view of your organisation, does your organisation do anything to respond?
- Has media attention alone ever made you disclose information or is it simply a contributory factor?
- Would the stakeholder groups mentioned above be as concerned about the environment if the media didn't get involved?
- Would the stakeholder groups be as powerful if the media didn't get involved?
- Do you think the media drives public perceptions, or rather, reflects public perception?

## 6. POLITICAL ENVIRONMENT

- South Africa has, in many respects, made a quite remarkable U-turn from a political perspective about 4-8 years ago. Did the pressures on the organisation change from 10 years ago?
- Did the political changes result in power shifts? If so, in which direction?
- How did this change your environmental reporting?

## 7. EVENTS

- Which major social events or maybe disasters in the last 5 years has had an impact on your reporting?
- Why were these events important from your organisation's perspective?
- Would it be as important if the media didn't get involved?
- Would it be as important if the stakeholders didn't get involved?
- Would it be as important if the politicians didn't get involved?



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