

**General Methodology 2:  
Impact Measurement and Valuation Techniques**

Basis for Conclusions

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**Note to readers:**

In this document, references to paragraph numbers and sections refer to the final version of *General Methodology 2: Measurement and Valuation Techniques* that was approved by the Valuation Technical and Practitioner Committee (VTPC) on October 23<sup>rd</sup>, 2025. References to paragraph numbers and sections in the Exposure Draft of *General Methodology 2: Measurement and Valuation Techniques* are explicitly stated.

## Background

- BC1. *General Methodology 2: Impact Measurement and Valuation Techniques (GM2)* is the second General Methodology statement published as part of the impact accounting system (the Methodology) being developed by the partnership between the International Foundation for Valuing Impacts (IFVI) and the Value Balancing Alliance (VBA).
- BC2. The purpose of GM2 is to outline the data requirements, measures, and techniques that inform the impact measurement and valuation components of impact accounting. It builds on the concepts, definitions, and principles in *General Methodology 1: Conceptual Framework for Impact Accounting* by describing the quantitative tools used to develop impact accounting methodologies and prepare impact accounts.
- BC3. As a starting point for GM2, the content was divided into three themes: (1) data sources and measurement approaches; (2) well-being, outcomes, and impacts; (3) and economic value and impact measurement techniques. A literature review was conducted of key documents from the fields of impact management, sustainability-related disclosures, and public policy frameworks. The rationale for including each field in the literature review is summarized below.

- a. *Impact management.* The Methodology is designed to generate impact information by measuring and valuing impacts. Organizations in the impact management ecosystem have developed frameworks and protocols in recent decades that provide extensive guidance on how to measure and value impacts. Frameworks and protocols in the impact management ecosystem served as the source for a majority of the concepts developed in *General Methodology 1: Conceptual Framework for Impact Accounting*.

In GM2, foundational concepts in impact management, such as the definitions of well-being, primary data, secondary data, and perspectives on capitals, dimensions of well-being, and monetary valuation, are adapted from existing frameworks and protocols to align with the purpose of the Methodology, including those published by:

- i. Capitals Coalition;
  - ii. Impact Management Platform (IMP);
  - iii. International Organization of Standardization (ISO) Standards;
  - iv. Value Balance Alliance (VBA)
  - v. Social Value International (SVI); and
  - vi. Transparent Project.
- b. *Sustainability-related disclosures.* The literature review included standards for sustainability-related disclosures of governing jurisdictions and international standard setters, specifically documents that pertain to cross-cutting or generalizable topics. The following were reviewed:

- i. ESRS 1 *General Requirements* of the European Sustainability Reporting Standards<sup>1</sup>;
- ii. GRI 1 *Foundation*, GRI 2 *General Disclosures*, and GRI 3 *Material Topics* of the Global Reporting Initiative; and
- iii. IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* of the IFRS Foundation.

GM1 incorporates and applies concepts from sustainability- and financial-disclosure standards throughout section 3 ‘Qualitative Characteristics of Impact Information’ and section 5 ‘Impact Materiality and the Preparation of Impact Accounts’. Specifically, the qualitative characteristics of impact information are used in sections 2.4 ‘Considerations for Data Collection’, 3.8 ‘Selecting Well-Being Measures’, 4.5 ‘Considerations for Selecting a Valuation Technique’, and 3 ‘Defining Outcomes and Measuring Impacts’.

In GM2, the qualitative characteristics of faithful representation, relevance, and the enhancing qualitative characteristics of comparability, verifiability, and understandability may be used to decide between the best available data sources, measures, and techniques, as well as to determine materiality in an impact pathway.

- c. *Public policy frameworks.* The literature review included public policy frameworks, specifically the Organisation for Economic Co-operation and Development (OECD). Fundamental concepts of GM2, including subjective and objective measures and specifying outcomes using dimensions of well-being, were adopted from the OECD.
- BC4. Following the literature review, the technical staff, guided by the VTPC, prepared a draft of GM2 for public review. This statement was initially distributed to the VTPC as a Pre-Exposure Draft in May of 2024. The members of the VTPC provided feedback, and the Exposure Draft was approved on June 26, 2024, for public distribution to solicit comments and feedback. The comment period started on September 24, 2024, and ended on January 31, 2025.
- BC5. The Exposure Draft contained a series of proposals for public comment. The Exposure Draft solicited targeted feedback on five proposals:
- a. Overall usability of General Methodology 2;
  - b. OECD Well-being Framework and its role in the Methodology ;
  - c. Well-defined outcomes and impact materiality;
  - d. Value factors in impact accounting;
  - e. Considerations for selecting a valuation technique; and

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<sup>1</sup> At the time of writing, the revised and finalized ESRS following the EU-Omnibus process have not yet been published.

- f. Feedback on additional proposals in the statement.<sup>2</sup>
- BC6. A total of 20 comment letters were received, containing 162 individual comments in response to the six consultation questions. The feedback represented a diverse range of geographies. In addition, a feedback session was held with 13 participants, and 3 separate feedback meetings were conducted.
- BC7. Overall, the comment letters were supportive of the scope of the Methodology. However, several respondents requested greater clarity regarding definitions, concepts, and illustrative examples. This document does not respond to every comment submitted but instead emphasizes areas of convergence in the feedback.
- BC8. Furthermore, on July 22, 2025, IFVI announced a merger with the Capitals Coalition. In October, multiple meetings were held between IFVI, VBA, and Capitals Coalition to ensure alignment with concepts, definitions, and references prior to the finalization of GM2. The purpose of alignment is to harmonize concepts and terminology between IFVI, VBA, and the Capitals Coalition, ensuring conceptual coherence and practical alignment across existing frameworks.
- BC9. As a result, some changes were made to the document to ensure alignment. *General Methodology 2: Measurement and Valuation Techniques* has been further revised to clarify the relationships among impacts, outcomes, capitals, and well-being dimensions, while maintaining coherence with the Capitals Approach. The changes made, as a result of the merger, were minor and do not materially affect the methodology's core principles or structure.
- BC10. In this document, the basis for conclusions is summarized for each section. These conclusions were based on either the research of the technical staff, conducted before publishing the Exposure Draft and in response to the public comment period, as well as from alignment meetings between IFVI, VBA, and Capitals Coalition. The final version of the GM2 statement was approved by the VTPC on October 23<sup>rd</sup>, 2025.<sup>3</sup>

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<sup>2</sup> For the complete description of the proposals for which feedback was solicited, see IFVI and VBA. (2024). Exposure Draft of *General Methodology 2: Impact Measurement and Valuation Techniques*.

<sup>3</sup> *General Methodology 2: Impact Measurement and Valuation Techniques* (GM2) was conditionally approved by the Valuation Technical and Practitioner Committee (VTPC) on October 23, 2025, pending a revision of the outcome definition to ensure clarity when monetary valuation is applied. The definition was revised in partnership with the VTPC members, and the document received final approval on October 31<sup>st</sup>, 2025.

# 1 Introduction

## 1.1 Document purpose

- BC1. In the Exposure Draft, the purpose statement in paragraph [1] describes the role of the Methodology, which is to specify the data requirements and methods needed for the impact measurement and valuation parts of the impact accounting methodology.
- BC2. This document was initially conceived as part of GM1, but as the scope expanded, it became clear that separating it into its own statement would improve clarity. While GM1 is mainly theoretical, feedback from comment letters highlighted the need for more concrete guidance on how the methodology works in practice - particularly on determining the monetary value of impacts. GM2 bridges the gap between conceptual principles and practical application, showing in more detail how methodologies are developed and implemented. The VTPC approved it as part of the 2024 work plan.
- BC3. Respondents provided various comments on the stated purpose of the document. A respondent noted that Section 3.6 of the Exposure Draft does not describe objective and subjective well-being methods, but rather types of metrics. As a result, the document only partially fulfills the stated purpose outlined in paragraph [1]. In response to this feedback, the term “methods” was replaced with “measures”, as both objective and subjective well-being are primarily presented in the literature as metrics or measures. The term “measures” was selected to align with one of the primary sources referenced in the document, the *OECD Guidelines on Measuring Subjective Well-being*. Furthermore, the Methodology describes techniques throughout section 4 ‘Monetary Valuation’. As a result, the term “techniques” was added to the purpose statement in paragraph [1] of the revised GM2 statement.
- BC4. Several respondents also noted that the purpose of the Methodology, its position within the broader impact ecosystem, and its intended audience were unclear. In response to the feedback, clarifying language was added to explain that the Methodology is not intended to serve as user guidance for impact accounting. Instead, it is intended to inform the development of Topic- and Industry-specific Methodologies and to complement action-oriented resources in the ecosystem.<sup>4</sup>
- BC5. To support its complementary role, the Methodology builds on a range of established frameworks and protocols, including those published by the Capitals Coalition, the Transparent Project, the Impact Management Platform, Social Value International, the OECD Framework for Measuring Well-being, ISO standards, and sustainability-related disclosure requirements issued by regulatory bodies and international standard setters.
- BC6. The Methodology acknowledges that, in the absence of published Topic- and Industry-specific Methodologies with standardized impact pathways, preparers may rely on the

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<sup>4</sup> Complementary to action-oriented guides such as the *Capitals Protocol-Part of the Integrated Decision-Making Framework*, and *Governance for Valuation-Part of the Integrated Decision-Making Framework* by the Capitals Coalition<sup>4</sup> and *The Principles of Social Value* by Social Value International.

general guidance it provides to develop their impact pathways for additional topics and industries. This reinforces the Methodology's role as a foundational resource for applying impact accounting in decision-making. The Methodology also emphasizes that it is not intended to be exhaustive, recognizing that methods for measuring and valuing impacts in monetary terms will continue to evolve as impact accounting develops.

BC7. Additionally, as result of the meetings between IFVI, VBA, and Capitals Coalition for alignment of terms and concepts, paragraph [5] was added to highlight the similarities and differences between Capitals Coalition' Capitals Protocol and IFVI-VBA Methodologies.

## 1.2 Impact Measurement and valuation in the context of impact accounting

BC8. Several paragraphs in this section, including paragraphs [6, 7, 8, and 9] of the Exposure Draft, are summaries of concepts that are developed more completely in later sections. Specifically, paragraph [9] of the Exposure Draft summarizes the measurement and valuation components described in each section and steps in the impact pathway, including Figure 1.

BC9. Paragraph [9a] reflects section 2 'Data Requirements and Impact Drivers', which describes the data needed to prepare impact accounts and how data sources and modeling techniques can be used to address data gaps. Paragraph [9b] reflects section 3 'Defining Outcomes and Measuring Impacts', which explains the role of well-being in impact accounting methodologies. Paragraph [9c] reflects section 4 'Monetary Valuation', which sets out the conceptual foundations for valuing impacts in monetary terms, including how individual preferences can be interpreted and the valuation techniques available.

BC10. A respondent emphasized the need for more precise guidance on developing impact pathways for Topic- and Industry-specific Methodologies. In response to the feedback, Figure 1 was made more concise by removing redundancies and providing a more precise explanation of each section's purpose, as well as the roles of the preparer and the Methodology itself.

BC11. Further adjustments were made as result of the alignment meetings between IFVI, VBA, and Capitals Coalition. Paragraph [9] of the exposure draft - now paragraph [10] in the final approval draft, along with Figure 1, was revised. The third step in Figure 1 no longer sits outside the impact pathway, and the arrow in Figure 1 has been extended to include valuation in the impact pathway. This change was made to signal that monetary valuation is an integral part of how impacts are captured in impact accounting and to strengthen the link to how Topic- or Industry-specific methodologies are modelled in practice. It further ensures consistency with the definition of *impact*. See the updated definition of *impact* in the Appendix A.

BC12. Additional feedback confirmed that the relationship between the General Methodology and the Topic- and Industry-specific Methodologies is clear, and that the steps involved in developing an impact pathway are well articulated.

BC13. Another respondent mentioned that references to the Governance for Valuation by Capitals Coalition should be included. The final version of the GM1 statement (see paragraph [13]) acknowledges that the Impact pathways developed in Topic- and Industry-specific Methodologies are aligned with the Governance for Valuation, produced by the Capitals Coalition and Value Commission. Additionally, the Methodology notes that, when applicable, Topic- and Industry-specific Methodologies will include a summary of relevant content related to the Governance for Valuation, presented according to the template in Appendix E: Value Commission Transparency Report Template.

## 2 Data Requirements and Impact Drivers

### 2.1 Data Requirements

- BC14. The Exposure Draft proposed that the impact driver data is required to prepare impact accounts and should be specific to the entity, and must be collected to establish connections between the entity's activities and the impact being measured. The Exposure Draft further stated that the impact driver data may be sourced from within the entity or from external sources.
- BC15. A few respondents provided feedback on the data requirements section. A comment letter stated that there is limited clarity regarding the data requirements and the adequacy of data quality. In response to this feedback, the final version of GM2 acknowledges that Topic methodologies may include two sets of data requirements: a *preferred option* is more detailed for better accuracy, while the *minimal option* may be broader but still produces satisfactory results. These options were added to account for data limitations that might occur depending on the context of the Topic- and Industry-specific Methodologies, and have already been embedded in methodologies, including the Exposure Draft of Water Consumption.
- BC16. Two comment letters requested that the Methodology specify that the assumptions behind the calculations, including impact pathways, should also be disclosed for developed topics. Additionally, if sensitive information is embedded within the calculation process, the handling of such cases should be clearly explained. Paragraph [19] in the final version of GM2 incorporated these statements and noted that the process for developing impact pathways should be evidence-based.<sup>5</sup>

### 2.2 Data Collection and sources

- BC17. The Exposure Draft presents data sources for impact drivers. Research was conducted in existing frameworks to identify common data types and sources used to measure impact drivers and to demonstrate alignment between the data inputs required by Topic Methodologies and those used in sustainability disclosure requirements.
- BC18. The distinction between primary and secondary sources was informed by cross-referencing definitions used in existing frameworks and protocols within the impact management ecosystem, as well as sustainability-related disclosure standards, to ensure consistency and alignment.
- BC19. The Methodology includes a statement, similar to statements in the *Capitals Protocol* of the Capitals Coalition and *Corporate Value Chain (Scope 3) Accounting and Reporting Standard of the GHG Protocol*, which establishes that while primary data is the preferred source within an entity's own operations and value chain, secondary data may

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<sup>5</sup> For applications of evidence-based approaches see European Commission. (2023). *Annex I European Sustainability Reporting Standards*; Global Reporting Initiative. (2021). *GRI 1: Foundation 2021*; IFRS. (2024). *Resources for academics - Evidence-based Standard-setting*; and Sustainability Accounting Standards Boards (SASB).(2017). *SASB Conceptual Framework*.

be used if primary data is unavailable or if secondary data is of higher quality. Similar to the referenced statements, the Methodology proposes that, in practice, a combination of primary and secondary data may be used to quantify impact drivers. Furthermore, additional references were added including *Capitals Protocol - Part of the Integrated Decision-Making Framework* and *Governance for Valuation - Part of the Integrated Decision-Making Framework*.

BC20. Respondents provided no significant feedback on the data types or sources. Therefore, the final version of the GM2 statement retains the distinction between primary and secondary data as well as its data sources.

### 2.3 Techniques to estimate data

BC21. The Methodology outlines commonly used modeling techniques that can be applied to estimate the impact of drivers across an entity's own operations and value chain.

BC22. Techniques used to estimate data are drawn from widely recognized frameworks and sources within the impact management ecosystem, such as the *Capitals Coalition*<sup>6</sup>, the *GHG Protocol*, the *European Commission*, the *Transparent Project*, and the *Green Six Sigma Handbook*. These techniques include extrapolated data<sup>7</sup>, hybrid approaches<sup>8</sup>, input-output models<sup>9</sup>, life-cycle assessment<sup>10, 11</sup>, material flow analysis<sup>12</sup>, and productivity modelling.<sup>13</sup>

BC23. Respondents provided no feedback on this section, and no changes were made.

### 2.4 Considerations for data collection

BC24. The Methodology proposed that preparers use the qualitative characteristics of impact information, specifically faithful representation, when considering data types and sources. The Exposure Draft does not specify the types of data collection or estimation

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<sup>6</sup> Adapted from Capitals Coalition. (2016). *Natural Capital Protocol*. and Capitals Coalition. (2025). *Capitals Protocol - Part of the Integrated Decision-Making Framework*.

<sup>7</sup> GHG Protocol. (2011). *Corporate Value Chain (Scope 3) Accounting and Reporting Standard*.

<sup>8</sup> Reimann et al. (2010). *Evaluation of environmental life cycle approaches for policy and decision-making support in micro and macro level applications*. JRC of the EU Commission.

<sup>9</sup> Adapted from Capitals Coalition. (2016). *Natural Capital Protocol*.

<sup>10</sup> Transparent Project. (2023). *Standardized Natural Capital Management Accounting: A methodology promoting the integration of nature in business decision making*; Capitals Coalition. (2019). *Social & Human Capital Protocol*.

<sup>11</sup> EU Commission – Joint Research Center. (2012). *Organisation Environmental Footprint (OEF) Guide*; EU Commission. (2021). *Understanding Product Environmental Footprint and Organisation Environmental Footprint methods*; Huijbregts et al. (2016). *ReCiPe2016: A harmonized life cycle impact assessment method at midpoint and endpoint level*; GreenDelta. (2023). *PSILCA v. 3.1 - A Product Social Impact Life Cycle Assessment database*.

<sup>12</sup> Ron Basu. (2022). *The Green Six Sigma Handbook: A complete Guide for Lean Six sigma practitioners and managers*.

<sup>13</sup> Adapted from Capitals Coalition. (2016). *Natural Capital Protocol*.

necessary for applying impact accounts. The Methodology also proposed that when selecting between data sources or selecting a modeling technique to estimate data, the qualitative characteristic of faithful representation should be applied to ensure that impact drivers are complete, neutral, and free from error.

- BC25. As introduced in GM1, the qualitative characteristics of impact information are adapted from the qualitative characteristics of the ESRS, FASB, and IFRS, including the IFRS *Conceptual Framework* and IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information*.<sup>14</sup>
- BC26. Several respondents provided feedback specific to the qualitative characteristics of the impact information, and minor revisions were made accordingly. That feedback is summarized in the respective sections below.
- BC27. A few comment letters noted that, while the Methodology references the qualitative characteristics of *faithful representation, comparability, understandability, and verifiability*, these terms are not explicitly defined. As a result, their practical application, particularly in selecting data sources or valuation techniques, remains unclear. While one comment letter suggested that readers can implicitly understand these characteristics, several others emphasized the need for explicit definitions. In response to this feedback, a footnote was added directing readers to GM1 for additional information, where each qualitative characteristic of impact information is defined.
- BC28. One comment letter expressed concern that, in the absence of clear guidance, the responsibility for selecting data sources may fall entirely on the preparer, with limited emphasis on stakeholder engagement in that process.
- BC29. In response to the lack of clear guidance, the Methodology is intended to inform the development of Topic- and Industry-specific Methodologies, where data sources and modeling techniques will be addressed more explicitly, as noted in paragraph [32] of the Exposure Draft. The Methodology acknowledges that the selection of data sources or modeling techniques involves trade-offs and may vary based on the specific context. However, it emphasizes that preparers should disclose the rationale behind their choices to support transparency and accountability.
- BC30. No other changes were made in this section.

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<sup>14</sup> See European Commission. (2023). ESRS 1 General Requirements. *Annex I European Sustainability Reporting Standards*; FASB. (2018). *Statement of Financial Accounting Concepts No. 8*; IFRS. (2023). *IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information*; and IFRS. (2018). *Conceptual Framework for Financial Reporting*.

### 3 Defining Outcomes and Measuring Impacts

#### 3.1 Foundations for impact measurement

- BC31. The Exposure Draft establishes that the role of impact measurement is to understand changes in the well-being of affected stakeholders resulting from an entity's activities. This section proposes that this is achieved by clearly defining outcomes and measuring impacts resulting from them. Accordingly, much of the section is dedicated to the process of identifying and articulating relevant outcomes.
- BC32. This section also introduces the definition of *impact*. In the approval process, VTPC members emphasized the distinction between *impact* and *outcome*, noting that *outcomes* should remain non-monetary, representing the change itself, while *impacts* should be reserved for instances where valuation is applied.
- BC33. Following the alignment meeting between IFVI, VBA, and Capitals Coalition technical staff and further engagement with VTPC members, revised wording led to the following updated definitions of *impact* and *outcome*:
- a. *Outcome*: The change in the state or condition of capital(s), in physical, biological, psychological, human rights, or equity terms that results from an entity's activities.
  - b. *Impact*: A positive or negative change in one or more dimensions of people's well-being directly or through a change in the natural environment. In impact accounting, this is expressed in monetary terms.
- BC34. With respect to the public comment period, two comment letters emphasized the need for more precise guidance on the types of outcome-based data required to reflect changes in stakeholder well-being, ensuring alignment with measurement objectives and stakeholder-relevant impacts. In response to this feedback, a sentence was added to paragraph [41] of the final version of GM2, which noted that when appropriate, the need for measurement of direct outcome data as part of minimum or preferred data requirements will be disclosed in Topic-and Industry-specific Methodology.
- BC35. This section was further edited to make it more concise. However, no other significant changes were made in this section.

#### 3.2 The definition of well-being

- BC36. To define well-being for the Methodology, various sources were reviewed including the Glossary of the Impact Management Platform; *How's Life? 2020: Measuring Well-being* (as well as 2013 and 2011 editions) by the OECD<sup>15</sup>; the *Conceptual Framework for Impact-Weighted Accounts* by the Impact Economy Foundation<sup>16</sup>; *Standard on Applying Principle 2: Understand What Changes* by Social Value international<sup>17</sup>; *National Accounts of Well-being and Measuring Well-being: A guide for practitioners* by the New

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<sup>15</sup> OECD. (2020). *How's Life? 2020: Measuring Well-being*.

<sup>16</sup> Impact Economy Foundation. (2022). *Conceptual Framework for Impact-Weighted Accounts*.

<sup>17</sup> Social Value International. (2019). *Standard on applying Principle 2: Understand What Changes*.

Economics Foundation,<sup>18</sup> and a report by the Commission on the Measurement and Economic Performance and Social Progress.<sup>19</sup>

- BC37. The Impact Management Platform was prioritized as the primary reference for definitions related to well-being, to promote harmonization across frameworks.<sup>20</sup> Therefore, in the Methodology, well-being is defined as the state of being or doing well in life; a happy, healthy, or prosperous condition; moral or physical welfare.<sup>21</sup>
- BC38. Paragraph [40] of the Exposure Draft describes the distinction between utility and well-being.<sup>22</sup> A respondent mentioned that, conceptually, well-being and utility are different, but in practice, they overlap, and both follow the law of diminishing returns. The respondent also noted that economists, who develop most valuation methodologies, think in terms of economic utility and requested that the Methodology keep links to this concept to engage economists better.
- BC39. In response to the feedback, the paragraph was revised, and it was acknowledged that the concepts are distinct but overlapping. In many instances in the Methodology, utility functions are used to proxy well-being effects. No other revisions were made in this section.

### 3.3 A framework for well-being

- BC40. In the Exposure Draft, it was proposed that the OECD Well-being Framework should be the default framework in the Methodology for describing well-being dimensions. The OECD well-being framework is composed of 11 dimensions that describe components of current well-being and 4 capitals that describe the resources that underpin well-being in the future.
- BC41. As stated in section 3.2 'The definition of well-being' of the Methodology, the decision to propose the framework is based on the extensive work by the OECD and other international organizations, national governments, and researchers on measuring societal progress.<sup>23</sup> The framework also provides useful granularity through its well-being dimensions to describe outcomes and integrates concepts used in the field of impact management, such as capitals. Each dimension and capital are described in detail in Appendix C of the revised GM2 statement.

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<sup>18</sup> New Economics Foundation. (2009). *National Accounts of Wellbeing: Bringing Real Wealth onto the Balance Sheet*.

<sup>19</sup> Joseph Stiglitz et al. (2009). *Report by the Commission on the Measurement of Economic Performance and Social Progress*.

<sup>20</sup> See *Key terms and concepts*. (2023). Impact Management Platform.

<sup>21</sup> Adapted from Impact Management Platform. (2023). *Key terms and concepts*..

<sup>22</sup> See page 10 of New Economics Foundation. (2008). *Measuring Well-being in Policy: Issues and Applications*.

<sup>23</sup> OECD. (2022). *Measuring the non-financial performance of firms through the lens of the OECD Well-being Framework: A common measurement framework for "Scope 1" Social performance*.

- BC42. Many respondents supported the OECD Framework because it is a comprehensive structure for understanding well-being's dimensions and is the most established and developed framework. In response to the feedback, the Methodology retains the OECD well-being Framework due to its global applicability.
- BC43. However, several respondents expressed concerns that it is a relatively new framework and is not yet widely adopted at the corporate level, emphasizing the need for practical guidance on how companies can effectively implement the OECD Well-being Framework. Regarding this feedback, impact pathways in Topic- and Industry-specific Methodologies build on descriptions of the well-being dimensions affected by an entity, to articulate the change in the underlying capitals, and it is planned to supplement Topic Methodologies with implementation guides which include practical examples.<sup>24</sup>
- BC44. Other respondents noted that the OECD Framework may not be culturally relevant in all contexts and reflects a predominantly Westernized view of well-being. Furthermore, different cultures may use alternative ways of framing well-being, and developing countries, as well as intergovernmental organizations like the United Nations Sustainable Development Goals (SDGs), G20, and BRICS, also have similar well-being frameworks. Therefore, GM2 should incorporate inclusivity to accommodate such diverse perspectives in future considerations.
- BC45. To reflect this feedback, the revised GM2 statement includes an acknowledgment that other culturally relevant dimensions of well-being may be considered depending on the sustainability topic. It also clarifies that the OECD framework is not exhaustive and that additional components may be incorporated in Topic- and Industry-specific Methodologies, as shown in paragraph [48] and [49] of the revised GM2 statement.
- BC46. A comment letter requested additional explanation on how the dimensions of well-being relate to the impact pathway. Overall, the respondent appreciated the dimensions but felt they did not clearly explain how they relate to the overall pathway. The respondent also asked for clarification on the distinction between stocks and flows within the OECD Framework and noted that capitals affect not only future but also present well-being.
- BC47. In response to this feedback and reinforced by the alignment meetings of IFVI, VBA, and the Capitals Coalition, a new section, section 3.3.1 'The Role of Well-being Dimensions and Capitals within an Impact Pathway', was created. This section emphasizes that both well-being dimensions and capitals are important to identifying and clearly defining outcomes and impacts, providing a consistent approach to describe the most relevant aspects of changes in capitals and resulting level of well-being within the impact pathway. Unlike the Exposure Draft, which focused solely on using well-being

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<sup>24</sup> IFVI and VBA. (2024). *Implementation Guide: Greenhouse Gas Emissions, Supporting resource for the GHG Topic Methodology*.

dimensions when defining outcomes, the revised GM2 statement clearly outlines the role of both well-being dimensions and capitals within an impact pathway. Furthermore, in Topic- and Industry-specific Methodologies, outcomes in the impact pathway are expressed as changes in capitals. These changes may be qualitatively described by well-being dimensions and may be included for context.

- BC48. A second new section, section 3.3.2 ‘The Relationship between stocks, flows, capitals, and well-being dimensions’,<sup>25</sup> was added to clarify the relationship between these concepts further. The revised GM2 statement explains how both the OECD and Capitals Coalition view these terms. However, it adopts an agnostic stance regarding stocks and flows, as the specific terminology does not affect the results of the impact pathway. This section also introduces the updated terminology of *impact*. Previously, the definition of *impact* did not include the terms *positive* and *negative* when describing the term; however, this has been revised to align the terminology with the Capitals Coalition framework.
- BC49. Furthermore, a respondent noted that Figure 4 in the Exposure Draft, which reflects the OECD’s perspective on dimensions and capitals, does not align with the Capitals Coalition’s resources. According to the OECD, entities contribute to well-being by influencing current well-being (the 11 dimensions), while capitals are considered resources for future well-being. In contrast, Capitals Coalition resources consider capitals as the foundation of human well-being, both now and in the future.<sup>26</sup> The respondent emphasized that the actions of entities affect capitals, which in turn influence people’s well-being. In response to the feedback, references to “current” and “future” well-being were removed from Figure 4 (now Figure 2). The revised Figure now refers simply to “well-being dimensions” and “capitals,” and acknowledges the existence of differing interpretations in Section 3.3.2. Additionally, based on the public comment feedback, Figure 5 from the Exposure Draft was removed following a review by technical staff, as it was determined that its content did not enhance the clarity of the Methodology.
- BC50. A comment letter highlighted the importance of acknowledging feedback loops within the Methodology and referencing relevant resources. In response to the feedback, paragraph [52] of the revised GM2 includes a footnote noting that feedback loops can occur across various forms of capital, influencing their interactions through both balancing and reinforcing dynamics. It also emphasizes that such feedback loops should be considered during the methodology development process, with reference to the

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<sup>25</sup> For more information, see Box D.9 Estimating changes in stocks and flow for more information in Capitals Coalition. (2024). *Technical guidance on four capitals’ assessments*.

<sup>26</sup> The framework developed by the OECD to measure well-being distinguishes between current (well-being dimensions) and future well-being (capitals), see

*Capitals Protocol: Part of the Integrated Decision-Making Framework* by the Capitals Coalition.

BC51. Feedback noted that the Methodology does not address the timeframe or context of outcomes, which are important for assessing the sustainability or materiality of a change. The respondent also observed that the Exposure Draft references the temporal dimension of valuation in paragraph [95], which states that valuation may change over time as outcomes and related stakeholder preferences evolve. In response to the feedback, it was noted in paragraph [53] in this section that the Methodology considers both temporal (e.g., long-term effects vs. immediate consequences) and spatial connections (e.g., local vs. global effects) as well as potential trade-offs of impacts, as integral components of well-being.

#### 3.4 Well-being and the environment in impact accounting

BC52. The section introduces the relationship between the environment and well-being in impact accounting. In the Exposure Draft, this section was named ‘the role of well-being in impact accounting’.

BC53. While reviewing the comment letters, some feedback highlighted the need for the Methodology to more clearly explain the connection between environmental impacts and human well-being, specifically referencing frameworks like the Natural Capital Protocol and similar standards. Although this content was already covered in the relevant section, technical staff recognized that the section title did not accurately reflect its focus. Consequently, the title was changed to ‘Well-being and the Environment in Impact Accounting’ to represent the content and its purpose better (see paragraphs [54] and [55]). As a result of the meeting between IFVI, VBA, and the Capitals Coalition, this section was further refined to align terminology.

BC54. No other changes were made to this section.

### 3.5 Defining outcomes

- BC55. The Exposure Draft proposed that the qualitative characteristic of relevance should be applied to determine whether a well-defined outcome is material from an impact materiality perspective and, therefore, should be included in an entity's impact accounts. Several specific proposals, described in paragraphs [48] and [49] of the Exposure Draft, are made for assessing whether an affected stakeholder or a dimension of well-being is relevant.
- BC56. The decision to propose the qualitative characteristic of relevance to determine impact materiality stems from GM1.<sup>27</sup> In GM1, impact materiality is defined as an entity-specific aspect of the qualitative characteristic of relevance. The qualitative characteristic of relevance is used to determine whether the defined outcome is material from an impact materiality perspective and should be included in the impact pathway.
- BC57. The Methodology intends that preparers should assess which outcomes are relevant to the activities of the entity to ensure fair presentation. In practice, this means that defining an outcome includes identifying the affected stakeholder and the capitals and/or dimensions of well-being that change for that affected stakeholder as a result of the entity's activities. Following the alignment meetings between IFVI, VBA, and Capitals Coalition, this section was further clarified that defining an outcome includes identifying changes in capitals and the affected stakeholder as a result of the entity's activities.
- BC58. In reviewing the feedback, some respondents agreed with the concepts and methods proposed in this section. However, several respondents expressed concern regarding the term *well-defined outcome*, noting that its definition had diverged significantly from its origin in Social Value International. In response, the framing has been revised to the process of *defining an outcome* to better reflect the approach of the Methodology, rather than a uniquely defined term itself. The revised version of GM1 also includes an additional footnote referencing the source to ensure users are aware that the definition has been adapted. This section maintains its connection to the qualitative characteristic of relevance in the context of defining outcomes.
- BC59. Additionally, one respondent noted that the definition of *impact materiality* was not provided in paragraphs [47–49] or the glossary of the Exposure Draft. They emphasized the importance of establishing a clear definition, given that impact materiality is a critical concept. Furthermore, a few comment letters requested more detail on the qualitative characteristic of relevance. In response to the feedback, impact materiality has been added to Appendix B: Definitions in the Impact Management Ecosystem, along

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<sup>27</sup> For more information, review GM1's Basis of Conclusions. IFVI and VBA. (2023). General Methodology 1: Conceptual Framework for Impact accounting - Basis of Conclusions [https://ifvi.org/wp-content/uploads/2024/02/IFVI\\_VBA\\_General-Methodology-1\\_Basis-for-Conclusions.pdf](https://ifvi.org/wp-content/uploads/2024/02/IFVI_VBA_General-Methodology-1_Basis-for-Conclusions.pdf)

with several footnotes directing users to GM1 for additional information on the qualitative characteristic of relevance, including the three perspectives considered.

- BC60. Several comment letters noted that, based on the current description, it is unclear how to apply the concepts in practice. Respondents requested a more detailed explanation, including concrete examples, to improve clarity and guidance. In response, an example from Occupational Health & Safety (OHS) was added. Additionally, it is planned to supplement the Topic Methodologies with implementation guides which include practical examples.
- BC61. Several respondents emphasized the importance of stakeholder engagement, highlighting the following:
- a. While the OECD Well-being Framework offers a useful structure, stakeholder input is essential for prioritizing the most relevant dimensions.
  - b. Value factors should reflect stakeholder-informed valuations of changes in well-being, rather than abstract or market-based preferences.
  - c. Valuation techniques should center on the experiences and preferences of those directly affected, especially marginalized or underrepresented groups - an area where the Exposure Draft lacks clear guidance.
  - d. Engaging stakeholders in the selection of valuation techniques helps ensure alignment with their values and lived experiences.
- BC62. In response to the feedback, several changes were made throughout the Methodology to acknowledge the role of stakeholder perspectives. First, a new call-out box (Box 1: *Stakeholder Engagement*) was added to emphasize the importance of stakeholder engagement in impact accounting. This box explains how IFVI/VBA methodologies incorporate stakeholder input throughout the development process, including through opportunities for public comment and the use of the best available research on the impacts and relative value of specific corporate actions.<sup>28</sup> It also acknowledges that other bespoke methods of measurement and valuation, such as those developed by Social Value International (SVI), can be used in conjunction with this Methodology. Appendix B of the revised GM2 statement includes a comparison of various definitions used across the ecosystem, including how well-defined outcomes are described by Social Value International (SVI).
- BC63. The box further highlights that stakeholder perspectives may influence the choice of valuation perspective, depending on the specific use case or decision informed by impact accounting. In addition, a new section (section 4.7' Global and Local

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<sup>28</sup> This approach can be complemented by bespoke methods of measurement and valuation, in alignment with Principle 1: Involve Stakeholders and Principle 7: Verify the Result, in *The Principles of Social Value, as outlined by Social Value International (SVI)*.

Perspectives in Valuation’) elaborates on how valuation approaches can reflect both global and context-specific stakeholder perspectives.

BC64. As a result of the alignment meetings between IFVI, VBA, and the Capitals Coalition, “a change in dimension” was replaced by “a change in capital” and section 3.5.1 ‘Dimensions of well-being’ was updated to 3.5.1 ‘Capitals and their significance’. In response to the public comment feedback, when defining outcomes in the Methodology, particularly section 3.5.2 ‘affected stakeholders’, additional language was added to paragraph [62] to emphasize that the perspective of the stakeholder(s) is important when determining whether individuals or groups are included in the impact pathway. Additional language from GM1 related to monetary valuation in the Methodology is performed from the perspective of affected stakeholders was included in paragraph [76] of section 4.1 ‘Monetary Valuation in impact accounting’.

BC65. No other changes were made to this section.

### 3.6 Causal relationship in an impact pathway

BC66. A comment letter raised concerns that the Exposure Draft’s description of the *degree of separation* (see section 3.5.2) could be misused to exclude significant impacts. The respondent argued that entities might cite a high degree of separation as a reason to avoid managing certain impacts, especially when affected stakeholders are more removed from the company.

BC67. In response to the feedback, a new section, section 3.6 ‘Causal relationships in an impact pathway’, was added to address two topics: *chains of events* and the *directness of relationships* within the value chain. Specifically, this section clarifies that the inclusion of affected stakeholders in the impact pathway does not depend on the contractual nature of their relationship with the entity. It recognizes that entities may have direct impacts on stakeholders who are not employees, customers, or legally affiliated parties - for example, community members affected by the entity’s activities. This clarification ensures that a high degree of separation cannot be used as a basis for excluding material impacts. This section is further informed by the concept of a ‘well-defined outcome’ as articulated in *Principle 2: Understand What Changes of Social Value International*.<sup>29</sup>

BC68. The section also acknowledges that while data availability may be limited, entities have a responsibility to consider potential impacts across the value chain. In line with the feedback (paragraph [BC61]), the final version of GM1 emphasizes that assessments of materiality viewed from a stakeholder perspective should guide such judgments.

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<sup>29</sup> This Methodology builds on concepts presented in Social Value International. (2019). *Standard on applying Principle 2: Understand What Changes*. For more information on the concepts of the chain of events and well-defined outcomes, refer to the original document.

### 3.7 Measuring impact in the Methodology

- BC69. The Exposure Draft proposed that changes in well-being can be measured using either objective or subjective well-being measures, or a combination of the two. Each of the two approaches is described, and the limitations of each measure are introduced. The distinction used in this section between objective and subjective well-being measures is based on academic research, which considers these measures as the primary approaches for measuring well-being. The Methodology also introduces indicators that measure outcomes at a point in time, with repeated measurement of an indicator used to determine changes in well-being over time.<sup>30</sup>
- BC70. The literature review included the following sources: *OECD Guidelines on Measuring Subjective Well-being*<sup>31</sup>; *Measuring Well-being: A Guide to Practitioners* by the New Economics Foundation<sup>32</sup>; *International Labor Organization (ILO) Working Paper*<sup>33</sup>; *Well-being Measurements* by the Harvard T.H. Chan School of Public Health<sup>34</sup>; and the *Commission on the Measurement of Economic Performance and Social Progress* report.<sup>35</sup>
- BC71. Respondents did not provide significant feedback on using objective and subjective well-being as primary approaches for measuring well-being. As noted in the paragraph [BC2], previously in the Exposure Draft, the term “methods” was used to describe these types of well-being. However, the revised version of GM2 refers to them as “measures”. This change was made in response to feedback received during the public comment period. The change was implemented throughout the final version of the GM1 statement, and this section was updated to be more concise; no other edits were made.

### 3.8 Selecting well-being measures

- BC72. The Methodology acknowledged that impact can be measured using either of the two well-being measures or by combining both measures. The two measures may be complementary, with each assessing different aspects of well-being. The use of a single measure may also be fit for purpose and provide a faithful representation of an impact.
- BC73. The qualitative characteristic of faithful representation is applied to ensure that the indicators selected depict the underlying well-being dimensions in a manner that is complete, neutral, and free from error. When more than one measure is being

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<sup>30</sup> The words indicator and metric are often used interchangeably. Impact Management Platform. (2023). *Key terms and concepts*.

<sup>31</sup> OECD. (2013). *OECD Guidelines on Measuring Subjective Well-being*.

<sup>32</sup> New Economics Foundation. (2012). *Measuring Well-being: A guide for Practitioners*.

<sup>33</sup> International Labour Organization. (2022). *ILO Working paper 56: The current state of research on the two-way linkages between productivity and well-being*.

<sup>34</sup> Harvard T.H. Chan. (2017). *Well-Being Measurement*.

<sup>35</sup> Stiglitz, Joseph et al. (2018). *For Good Measure: Advancing Research on Well-being Metrics Beyond GDP*.

considered, the enhancing qualitative characteristics of comparability, verifiability, and understandability may be used to decide between available options.

- BC74. The qualitative characteristics of impact information are adapted from the qualitative characteristics of the ESRS, FASB, and IFRS, including the IFRS *Conceptual Framework* and IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information*.<sup>36</sup>
- BC75. Respondents provided no significant feedback in this section of the Exposure Draft, and no edits were made.

## 4 Monetary Valuation

### 4.1 Monetary valuation in impact accounting

- BC76. For the Methodology, the valuation of an impact is performed using a value factor, which is expressed in monetary terms. The Exposure Draft proposed a definition for a value factor that is based on the *Value Commission, Draft Transparency Criteria* of the Capitals Coalition. Since the release of that document, an updated definition has been revised, and now the definition in the Methodology is based on the *Governance for Valuation – Part of the Integrated Decision-Making Framework*.<sup>37</sup>
- BC77. In reviewing the feedback, a few comment letters emphasized that valuation should not be limited to monetary but should emphasize qualitative valuation alongside monetary valuation. For the Methodology and objective of impact accounting, the valuation of an impact is understood to mean the use of a monetary valuation technique.<sup>38</sup>
- BC78. To address this feedback, a footnote was added to paragraph [77] of the revised GM2 statement, clarifying that, as established in GM1, monetary valuation is intended to serve as a common and comparable measure to support decision-making. However, monetary valuation can be supplemented and complemented by other valuation techniques, such as those outlined by the Capitals Coalition.<sup>39</sup>

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<sup>36</sup> See European Commission. (2023). ESRS 1 General Requirements. *Annex I European Sustainability Reporting Standards*; FASB. (2018). *Statement of Financial Accounting Concepts No. 8*; IFRS. (2023). *IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information*; and IFRS. (2018). *Conceptual Framework for Financial Reporting*.

<sup>37</sup> Capitals Coalition. (2025). *Governance for Valuation - Part of the Integrated Decision-Making Framework*.

<sup>38</sup> The role and importance of valuing impacts is aligned with the Natural Capital Protocol and the Social & Human Capital Protocol of the Capitals Coalition, the Impact-Weighted Accounts Framework of the Impact Economy Foundation, and Principle 3: Value the Things That Matter of Social Value International. In the case of the Capitals Coalition's protocols, valuation is recognized to encompass many different approaches, including monetization. In the case of the Impact Economy Foundation's Impact-Weighted Accounts Framework, the principle of commensurability recommends the use of a monetary unit. In the case of Social Value International's Principle 3: Value the Things That Matter, the use of a monetary valuation technique should be considered in light of the audience, the type of decision being made, and the level of rigor required.

<sup>39</sup> The phrase 'relative importance, worth, or usefulness' does not necessary imply monetary valuation, but the purpose of the Methodology as outlined in General Methodology 1 is to use monetary valuation as a common and

- BC79. Furthermore, some respondents did not understand that the value factor described in paragraph [59] of the Exposure Draft could be presented using two approaches: the summary value factor and the disaggregated value factor. The Exposure Draft did not clearly distinguish between the two approaches. After further consideration, the sentence was removed as it no longer served its intended purpose and risked misinterpretation.
- BC80. Minor edits were made to improve conciseness, but no other significant changes were introduced.

#### 4.2 Foundations of monetary valuation

- BC81. In this section, the Exposure Draft outlines key definitions and concepts that underpin monetary valuation. A foundational idea is that monetary valuation is derived from the preferences of individuals, which reveal the relative importance, worth, or usefulness of a given topic. Related concepts include an individual's willingness to pay or willingness to accept, as well as how market prices for goods and services reflect these preferences. This section also consists of a call-out box (Box 3), which describes the valuation of impacts related to human health or human rights.
- BC82. To support the inclusion of monetary valuation, the Exposure Draft drew on commonly used sources, including ISO standards such as *Monetary valuation of environmental impacts and related environmental aspects*. These sources reflect established practices in ecosystem valuation and were used to ensure alignment with internationally recognized concepts. No changes were made in the section.

#### 4.3 Total economic value

- BC83. The Exposure Draft introduced the concept of total economic value, adapted from environmental economics and well accepted in the valuation literature, where it is used to acknowledge multiple ways in which market and non-market goods are valued beyond their 'use value', including option value, and non-use value. Descriptions of these components are provided in Appendix D. The concept was introduced to ensure that all significant dimensions of value are systematically considered when selecting valuation techniques.
- BC84. The Exposure Draft proposed that total economic value be defined as the combined value people derive from both market and non-market goods and services and outlined its application in the Methodology. Respondents provided no feedback on this section of the Exposure Draft, and no edits were made.

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comparable measure for decision-making. Monetary valuation can be supplemented and complemented with alternative valuation techniques, such as those outlined in Capitals Coalition. (2016). *Natural Capital Protocol* and Capitals Coalition. (2019). *Social and Human Capital Protocol*.

#### 4.4 Valuation Technique

- BC85. The Exposure Draft presents valuation techniques that may be used to assess the impacts of an entity, including cost-based, market-based, revealed preference, stated preference, and subjective well-being approaches.
- BC86. Each technique has its advantages and limitations in representing the preferences of affected stakeholders. These methods were included because they are commonly applied both in the Methodology and across the broader impact measurement ecosystem.
- BC87. The Methodology acknowledges that these techniques are not exhaustive. The literature review supporting this section drew on the following documents from the Capitals Coalition: *Capitals Protocol – Part of the Integrated Decision-Making Framework*, and *Governance for Valuation – Part of the Integrated Decision-Making Framework*, and the Monetary valuation of environmental impacts and related environmental aspects by ISO standards. Respondents provided no feedback on this section of the Exposure Draft, and no edits were made.

#### 4.5 Considerations for selecting valuation technique

- BC88. Consistent with other sections of the Exposure Draft, this section applies the qualitative characteristics of impact information. A valuation technique for a given impact pathway is selected to best capture the preferences of affected stakeholders about the impacts they experience, in line with the fundamental qualitative characteristic of *faithful representation*. The enhancing qualitative characteristics of *comparability*, *verifiability*, and *understandability* are also considered to ensure that impact information is decision-useful for its users.
- BC89. Additional considerations for selecting an appropriate valuation technique include total economic value, certainty, quality of proxy, and common use and acceptance. This principle-based approach to selecting the appropriate valuation technique for an impact pathway is designed with the understanding that flexibility will be necessary in choosing the right method for each specific topic.
- BC90. Several respondents highlighted that certain valuation techniques may raise ethical concerns, particularly when monetizing sensitive issues such as human health or human rights. Feedback also emphasized the importance of explicitly considering the ethical implications of valuation choices. One comment letter noted that, in the Methodology, well-being refers to human well-being; however, there may be situations where human well-being conflicts with the well-being of nature (including animals).
- BC91. In response to this feedback, *ethical considerations* were added to the other considerations alongside the qualitative characteristics for selecting an appropriate valuation technique. Additionally, a call-out box (Box 4) was added to the revised GM2 statement to highlight that monetary valuation raises a range of important ethical issues that should be addressed when choosing techniques. For example, ethical

considerations may include how impacts on current generations are weighed against those on future generations, particularly about the use of discount rates.

BC92. Box 4 emphasizes that monetizing impacts is not equivalent to pricing human health or human rights, nor does it imply that these are tradable in markets. Ethical considerations should guide whether and how monetary values are assigned to impacts, recognizing that some impacts may be difficult or inappropriate to express in economic terms.

BC93. No other changes were made in this section.

#### 4.6 Value Transfer and currency adjustments

BC94. The section introduces the concepts of value transfer and currency adjustments. In the Methodology, value transfer, also known as benefit transfer, refers to the process of using a measure of economic value from an existing study and applying it in a different context, adjusting when appropriate for spatial, temporal, and other contextual differences. This is a commonly accepted and necessary component of impact accounting in response to the current state of research on well-being and valuation – it is not possible to have fully global studies that can inform all aspects of the methodology, hence the need for meaningful approaches towards extrapolating research to other contexts.

BC95. No changes were made in this section.

#### 4.7 Global and Local perspectives in valuation

BC96. In response to the feedback on integrating stakeholder perspectives into valuation (see paragraph [BC61]), section 4.7 was added to the revised GM2 statement. This section emphasizes that, because local contexts vary across countries and impact accounting incorporates local specifics, valuation should consider the scope in which it will be applied to ensure relevance and avoid unintended consequences.

BC97. This section distinguishes between two viewpoints: a *global perspective* for impact accounting across multiple countries, and a *local perspective* for application within a single jurisdiction, as well as utility weights which can supplement the Methodology's global approach (paragraph [113 – 114]). Table 3 outlines these perspectives and provides further detail.

#### 4.8 Social discounting

BC98. The Exposure Draft proposed that when impacts materialize in a period other than that for which impact accounts are being prepared, they should be converted into present value using a social discount rate, also known as the Ramsey Rule.

BC99. The Exposure Draft also defined the social discount rate and parameters used to calculate the discount rate, such as the pure rate of time preference, consumption and utility, and the growth rate of consumption. The Exposure Draft also acknowledged that when preparing impact accounts, the Ramsey Rule is used to determine a social discount rate to convert impacts into present value. In the Methodology, social discount

rates aim to be consistent and comparable but are formally established in individual Topic and Industry-specific Methodologies.

BC100. The concepts in this section are adopted *from Cost-Benefit Analysis and the Environment: Further Developments and Policy Use Subjective well-being valuation* by the OECD.

BC101. No changes were made in the section.

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<sup>40</sup> *General Methodology 2: Measurement and Valuation Techniques* builds upon the following key sources.

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