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## Analysis of Sustainability Report Compliance with GRI 303 and 304 at PT Aneka Tambang

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### Abstract

This study aims to analyze the level of compliance of PT Aneka Tambang Tbk with sustainability reporting indicators based on the Global Reporting Initiative (GRI) 303 and GRI 304, which focus on water management and biodiversity, respectively. The method used is descriptive qualitative with a content analysis approach, which evaluates the extent to which the content of PT ANTAM's 2023 Sustainability Report is in accordance with the indicators in the GRI Standards 2021. The results show that the company's level of compliance with GRI 303 is 80%, while with GRI 304 is 100%. This finding indicates that the company is more consistent and comprehensive in reporting biodiversity aspects compared to water and effluent aspects. The implications of this study show the importance of transparency in sustainability reporting, especially in environmental aspects that have a direct impact on operational licenses and public legitimacy. The novelty of this study lies in the specific focus on two important aspects of environmental reporting and the application of qualitative analysis to recent reports from national mining companies. This research provides academic as well as practical contributions for companies in improving the quality and compliance of sustainability reporting.

**Keywords:** *Sustainability Report, GRI 303, GRI 304, PT Aneka Tambang Tbk*

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### INTRODUCTION

The issue of sustainability and environmental preservation is a major focus in modern business practices, especially for industries operating in the mining sector. Mining activities have a potentially large impact on the environment, especially on biodiversity and water resources around the Company's operational areas (Chandra & Shauki, 2024). To answer this challenge, companies are required to transparently disclose how they manage their environmental impacts. One form of accountability is realized through the preparation of sustainability reports that refer to international standards such as the Global Reporting Initiative (GRI) (Ayu et al., 2024). Two important parts of the GRI standards relevant to the mining sector are GRI 303 and GRI 304, which respectively address water and effluent management and biodiversity.

A growing phenomenon shows that large companies in the mining sector, including PT Aneka Tambang Tbk (ANTAM), have begun to prepare and publish

sustainability reports as a form of social and environmental responsibility. However, not all sustainability reports provide comprehensive disclosures and are in accordance with the indicators set out in GRI 303 and GRI 304. Information on water usage, wastewater treatment, operational locations in sensitive areas, and impacts on ecosystems and species, are often still presented in a general manner without standardized details (Pratama & Permatasari, 2024). Meanwhile, academic studies that specifically examine compliance with the two GRIs are also limited, with most of the literature only highlighting environmental aspects in general.

Therefore, it is important to conduct this research to assess the extent to which PT ANTAM has complied with the disclosure indicators in GRI 303 and GRI 304 in its sustainability report, especially the most recent one. This research not only provides an evaluation of the quality of environmental reporting, but also serves as a basis for increasing the company's transparency and accountability for managing the environmental impacts of its activities.

## **METHOD**

This research uses descriptive qualitative methods. Qualitative methods are used to research on natural object conditions, where the researcher is the key instrument. In this study, the researcher explains narratively and in depth about the level of compliance of PT Aneka Tambang Tbk with the indicators in GRI 303 and GRI 304 which focus on water management and biodiversity. This approach was chosen because it is suitable for examining the content of sustainability documents based on certain standards through content analysis.

The data used is the Sustainability Report of PT ANTAM in 2023 downloaded from the company's official website. Data collection was carried out through documentation studies, then analyzed by matching the contents of the report against the GRI 303 and GRI 304 indicators of the GRI Standards 2021 version. Each indicator was evaluated based on its fulfillment, and given a score of 1 (complete), 0.5 (partial), or 0 (not disclosed). The results of the analysis are then presented narratively, showing the level of compliance of each indicator and its interpretation in the context of corporate environmental responsibility.

## **RESULTS AND DISCUSSION**

### ***Sustainability Report***

Sustainability report also known as sustainability report is a type of report issued by a company with the aim of informing or communicating to all interested parties about the company's performance in terms of environmental, social, and good governance in an accountable manner (Aggregat et al., 2020).

According to the Association of Chartered Certified Accountants (ACCA) (2004), a sustainability report is the submission of information regarding economic, environmental, and social policies, as well as the impact and performance of the organization along with its products in the context of sustainable development. Sustainability reports are also known as "triple bottom line reports" which include aspects of profit, people, and planet (Beno et al., 2022).

### ***Global Reporting Initiative (GRI)***

GRI is an organization that provides a framework for sustainability reporting that can be adopted by all types of organizations in all countries. GRI was formed by the US-based nonprofit Coalition for Environmentally Responsible Economies (CERES) and the Tellus Institute, with support from the United Nations Environment Programme (UNEP) in 1997. GRI is a multi-stakeholder, network-based organization. The central secretariat is based in Amsterdam, the Netherlands. The Secretariat acts as a hub to coordinate the activities of the many GRI network partners (Ummah, 2019).

Updates and revisions to the GRI guidelines have continued until the fourth generation, G4, was published in May 2013. This guideline was created with the aim that reporting organizations can disclose the most important impacts, both positive and negative on the environment, society and the economy. Another goal is that reporting organizations are able to produce information that is reliable, relevant, and can be used to assess any opportunities or risks, and disclose more information for informed decision making (Ningsih & Cheisviyanny, 2019).

### ***Sustainability Report Compliance***

Compliance in sustainability reporting is defined as the extent to which companies meet applicable standards and guidelines in the preparation of sustainability reports (Gunawan & Meiden, 2021). The level of company compliance with the GRI Standards can be measured through the analysis of mandatory disclosure items and recommendations. This level of compliance is important because it can reflect the integrity, transparency, and accountability of companies on sustainability issues. Compliance with international standards also increases stakeholder trust and the company's reputation in the eyes of the public.

### ***Legitimacy Theory***

Legitimacy theory explains that companies seek to ensure their activities and reporting are in line with the values and expectations of society in order to continue to gain social support and maintain their business sustainability. In the context of sustainability reporting, legitimacy theory is the basis for why companies compile and disclose information related to economic, social and environmental performance to stakeholders (Martania Dwi Hapsari, 2023).

Legitimacy theory emphasizes that companies constantly strive to operate in accordance with the norms and values that apply in the society or environment in which they are located. Companies seek to ensure that their activities are legitimately recognized and accepted by external parties. The basis of this legitimacy theory is the existence of a social contract between the company and the community in the company's operational area (Titani & Susilowati, 2022).

### ***Stakeholder Theory***

Stakeholder theory explains the role of management in meeting and managing the expectations of stakeholders. According to this theory, companies are expected to report their activities to stakeholders, even though the information may not always be used by them. Stakeholder theory emphasizes that companies are not just self-interested entities, but also have a responsibility to impact stakeholders. The main focus of this theory is on organizational accountability, which is considered more important than just financial or economic performance. Every stakeholder has the right to obtain information about company activities that can influence their decisions (Ebenhaezer & Rahayu, 2022).

Stakeholder theory explains that corporate responsibility is not only limited to shareholders, but also includes all stakeholders involved. This theory emphasizes the importance of the reciprocal relationship between companies and stakeholders, considering that companies cannot survive and develop without the support, contribution, and trust of various parties in the surrounding environment (Aruan et al., 2021).

**Tabel 1. GRI 303 Compliance Analysis Table - PT Aneka Tambang Tbk 2023**

<b>No</b>	<b>GRI Code</b>	<b>Disclosure Indicator</b>	<b>Disclosure Status</b>	<b>Brief Description of Findings in the Report</b>	<b>Score</b>
1	303-1	Interaction with water as a shared resource	Complete	ANTAM explained the use of ground and surface water, as well as the public consultation mechanism related to the SIPA permit.	1
2	303-2	Impact management related to water discharge	Complete	The use of WWTPs, recirculation ponds, and monitoring of wastewater quality with external laboratories were explained.	1
3	303-3	Water intake	Complete	Detailed by region, water type, and year. Total water withdrawal was 11,660.88 ML in 2023.	1

4	303-4	Water discharge	Complete	Includes tables of waste water amount per source, TSS/TDS measurement method, and laboratory test results.	1
5	303-5	Water Consumption	Not Disclosed	ANTAM stated that it does not calculate water consumption because water is reused many times, so it is not relevant.	0

$$\text{Compliance Rate} = \left( \frac{\text{Number of Indicators}}{\text{Total Score}} \right) \times 100\% \left( \frac{4}{5} \right) \times 100\% = 80\%$$

GRI 303 includes five indicators related to water and wastewater management. Based on the analysis of the 2023 Sustainability Report, PT ANTAM disclosed four indicators in full, and one indicator was declared not applied. In indicator 303-1, the company explains that it uses water from ground and surface water sources, and has conducted formal consultations and licenses such as SIPA. The use of water is managed by taking into account the availability of shared resources in the area around the mine.

Indicator 303-2 describes the management of impacts from water discharge. ANTAM reports that it uses wastewater treatment plants (WWTPs), recirculation ponds, and conducts regular water quality testing through third parties. For indicators 303-3 and 303-4, the company provided quantitative data on total water withdrawal and the amount of wastewater produced, including monitoring methods and test results for substances such as TSS and TDS. However, for indicator 303-5 on water consumption, the company states that it does not calculate specific consumption because the water used is generally recycled repeatedly, making it irrelevant. As a result, the score for GRI 303 is 80%.

Tabel 2. GRI 304 Compliance Analysis Table - PT Aneka Tambang Tbk 2023

No	GRI Code	Disclosure Indicator	Disclosure Status	Brief Description of Findings in the Report	Score
1	304-1	Operational sites located in or adjacent to protected or high biodiversity areas	Complete	UBP Gold and UBP Nickel North Maluku operate in conservation areas or	1

				adjacent to protected areas such as TNGHS and Pakal & Gee Island. The company has obtained official permits such as IPPKH and is progressively carrying out environmental rehabilitation.	
2	304-2	Significant impacts of activities, products and services on biodiversity	Complete	Impacts include landscape change, disruption of ecological systems, degradation of habitat quality due to mining and operational activities. ANTAM reports mitigation measures such as revegetation, coral reef transplantation and land rehabilitation.	1
3	304-3	Habitat protected or restored	Complete	ANTAM conducts habitat conservation and rehabilitation in various units, such as increasing green cover, conserving endemic flora and fauna, developing marine and land conservation areas, as well as hatching komodo dragon eggs (Haciko Eggs) and conserving white starlings.	1
4	304-4	Species on the IUCN red list or national conservation list whose habitat is impacted by the company's activities	Complete	ANTAM recorded 3 Extinct in the Wild species, 2 CR, 8 EN, 17 VU, 8 NT, 136 LC, 2 DD, and 33 NE.	1

				Specific data can be found in Appendix 1 of the report. Demonstrates concern for species affected by the company's operations.	
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$$\text{Compliance Rate} = \left( \frac{\text{Number of Indicators}}{\text{Total Score}} \right) \times 100\% \left( \frac{4}{4} \right) \times 100\% = 100\%$$

GRI 304 includes four main indicators relating to how the company manages its impact on biodiversity, especially those around its operational areas. Based on the analysis of PT Aneka Tambang Tbk's Sustainability Report 2023, all GRI 304 indicators have been fully disclosed. In indicator 304-1, the company explicitly explains that some of its business units, such as UBP Gold and UBP Nickel North Maluku, operate near protected areas such as Gunung Halimun Salak National Park (TNGHS) and conservation islands such as Pakal and Gee. In addition, the company also mentioned that it has obtained environmental licenses such as IPPKH (Forest Area Borrowing and Use Permit).

Indicator 304-2 on significant impacts on biodiversity is also elaborated in depth. ANTAM discloses landscape changes, potential disruption of ecological systems and habitat quality due to mining activities. As a form of responsibility, the company reports mitigation programs such as revegetation, reclamation, and coral reef transplantation. In indicator 304-3, the company mentions active habitat conservation and restoration efforts, including the preservation of endemic flora and fauna, the development of marine conservation areas, and the preservation of white starlings and the hatching of komodo dragon eggs.

Finally, for indicator 304-4, ANTAM reports specific data on the number and type of species based on IUCN categories and national conservation lists. As such, PT ANTAM scores 100% in compliance with GRI 304. This shows that the company is not just reporting, but also making active efforts in the protection and conservation of biodiversity around its operational areas.

### ***Compliance Comparison and its Implication***

When compared, PT ANTAM's level of compliance with GRI 304 is higher (100%) compared to GRI 303 (80%). This shows that the company pays greater attention to aspects of biodiversity, both in terms of narrative and supporting data. This could be because biodiversity around the company's operational areas is an important issue that is closely related to business licenses, public opinion, and environmental reputation.



On the other hand, constraints in disclosing GRI indicator 303, particularly on water consumption, suggest that there are technical limitations or internal approaches in recording the data. Nonetheless, the company has publicly stated the reasons for not reporting the indicator, demonstrating transparency in reporting.

In general, these results reflect that PT ANTAM has a strong commitment to environmental aspects in its sustainability reporting. This is in line with legitimacy theory, where companies demonstrate social responsibility to maintain community support. It is also in line with stakeholder theory, which emphasizes the importance of meeting the information needs of various stakeholders including regulators, local communities, and investors.

## **CONCLUSION**

Based on the analysis of the Sustainability Report of PT Aneka Tambang Tbk in 2023, it can be concluded that the company's level of compliance with GRI 303 and GRI 304 standards is in the high category, at 80% and 100% respectively. The company has fully disclosed information about interactions with water resources, liquid waste management, and biodiversity conservation efforts in its operational areas. However, there are still gaps in the disclosure of water consumption (GRI 303-5), which directly affects the compliance level of GRI 303. Meanwhile, the biodiversity aspect has been disclosed in detail and comprehensively, demonstrating the company's strong commitment to environmental conservation. These results show that PT ANTAM has demonstrated good transparency in certain environmental aspects, but still has room for improvement in certain indicators to optimize sustainability reporting. This research also emphasizes the importance of regular evaluation of reporting compliance as a form of corporate accountability and legitimacy in the eyes of the public and stakeholders.

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