

## **Sandwalk Consultation Draft Feedback**

Sandwalk is a UK based sustainability consultancy.

We welcome the guidance overall and in particular the appropriate emphasis on natural capital. We recognise nonetheless it will represent quite a challenge for many businesses to achieve.

We have been working on innovation in sustainability and have found leading companies bringing the two, historically largely separate, processes together. One of the keys to operating sustainably will be the development of appropriate products and services which when combined with the sense of purpose and additional networks brought to innovation by sustainability shows how important this will be. This very much informs our responses as below.

### Specific section comments

2.33 innovation should lead to minimising adverse environmental impacts as stated but it feels appropriate to say that by ensuring sustainability is fully embedded in the innovation process could lead to new products and services that not only add financial value but also have positive social and environmental outcomes.

3.11 explicit statement of the connection between environmental policies and the innovation processes to deliver new products and processes would be helpful (I think its implied here but would be helpful if it's a little stronger)

3.15 I think an extra bullet might be added here - saying that stakeholders might be involved in the identification and development of products that meet social and environmental needs

3.18 stakeholders might also be involved in the development of new products and services as part of the developing open innovation approach.

4.11 I would like to see something about alignment of public policy position with lobbying. It would be most concerning for example where an organisation with a progressive environmental policy argues against desirable environmental legislation but it is a wider governance issue.

In terms of additional guidance I think the internal connectivity/consistency issue is very challenging. We observe that there is a disconnect between innovation/product development and sustainability but it would also manifest itself in other areas. Fundamentally its about how the strategy is implemented I guess with proper consideration given to connectivity/information flows.

Best Regards

Paul