

Initiative for Responsible Mining Assurance (IRMA) Standard Development Procedure

v20241217

17 December 2024

Table of Contents

Summary.....	2
A. Scope.....	3
B. Procedure Effective Date	3
C. References.....	3
D. Definitions	3
1. Consistency Between Standards	4
2. Terms of Reference	4
3. Stakeholder Identification and Representation	5
3.1. Roles and responsibilities	5
4. Standards Development, Public Consultation, and Revision	6
4.1. Standards Development	6
4.2. Public Summary and Comment Period.....	6
4.3. Receipt and Handling of Comments.....	7
4.4. Review and Revisions of Approved IRMA Standards.....	8
5. Decision Making.....	9
5.1. Approval of New or Revised Standards.....	9
6 Language	10
7 Field Testing and Pilots	11
8 Feedback and Complaints	11
9 Availability of Approved IRMA Standards.....	11
10 Approved Departure from Procedure	12
11 Recordkeeping	12

Version History

Version	Date of Approval	Summary of changes
V20240718	18 July 2024	Formal approval by IRMA Board of Directors
V20241217	17 December 2024	Minor non-substantive changes: added reference to UNECE Guidelines, updated definitions, and clarified sequence of review at least every five years, then, if necessary, revision.

Summary

This document specifies the requirements and procedures to be followed by the Initiative for Responsible Mining Assurance (IRMA) for the development, review, modification, and approval of IRMA's Standards.

These procedures are designed to comply with the [ISEAL Code of Good Practice for Sustainability Systems Version 1.0](#) and thereby to demonstrate compliance with the applicable requirements of [ISO/IEC Guide 59 Code of good practice for standardization](#), and the WTO Technical Barriers to Trade (TBT) Agreement [Annex 3](#) Code of good practice for the preparation, adoption, and application of standards. They also seek alignment with the [UNECE Guidelines](#) on Developing Gender-Responsive Standards.

The objective of these procedures is to ensure the credibility of all IRMA standards by incorporating the values of transparency, participation, inclusivity, and fairness into the processes for their development, review, and revision, and through compliance with international best practice for standards development.

A. Scope

This document specifies the procedures to be followed by IRMA when developing, reviewing, and revising any of IRMA's standards.

B. Procedure Effective Date

The specified procedures shall take effect from 18 July 2024, the date of approval by the IRMA Board of Directors.

C. References

The primary reference document for this procedure is the ISEAL Code of Good Practice for Sustainability Systems Version 1.0.

D. Definitions

Stakeholder: any individual or group that has an interest in any of IRMA's standards and/or any IRMA decision or activity.

Standard: a document that provides, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory. For the purposes of this procedure, the term "standard" refers to any of IRMA's standards.

Chapter: an individual section of an IRMA Standard relating to a particular topic or requirement.

Mining company: a company, whether private, publicly listed, or State-owned, engaged in mining activities.

Downstream Purchaser: a company, whether private, publicly listed, or State-owned, that purchase mined materials to make other products.

Sector: one of the six stakeholder groups represented in IRMA's Board of Directors: mining companies, downstream purchasers, non-governmental organizations, affected communities, organized labor, and investment and finance.

IRMA Board of Directors: IRMA's leadership and governing body, including representation from each of IRMA's six stakeholder sectors.

IRMA Secretariat: IRMA's team of employees and consultants responsible for coordinating the development and revision of IRMA standards and the day-to-day management of all IRMA programs and activities.

1. Consistency Between Standards

At the outset of a new standards development process, IRMA shall:

- a) inform organizations that have developed similar international standards of its intention to develop a new standard;
- b) seek input from them on the terms of reference; and
- c) encourage their participation in standard development.

2. Terms of Reference

At the outset of a new standards development process and as needed thereafter, the IRMA Secretariat shall develop or update the Terms of Reference (TOR) for the standard in question which shall include the following elements:

- a) the proposed scope of the standard and the intended geographic application;
- b) a justification of the need for the standard, including: an assessment of the most important sustainability issues falling within the scope of the standard; an explanation of whether the proposed standard will meet an expressed need; and documentation of other standards operating or in development that meet all or part of the expressed need;
- c) clear social, environmental, and economic outcomes that the standard seeks to achieve and how those are linked to IRMA's Theory of Change; and

- d) an assessment of risks in implementing the standard and how to mitigate these, including: identification of factors that could have a negative impact on the ability of the standard to achieve its outcomes; unintended consequences that could arise from its implementation; and possible corrective actions that could be taken to address these potential risks.

3. Stakeholder Identification and Representation

3.1. Roles and responsibilities

A wide range of stakeholders have a role to play in developing and revising IRMA's standards.

IRMA Board of Directors: IRMA's leadership and governing body, including representation from each of IRMA's six stakeholder sectors. The IRMA Board of Directors oversees the work of the IRMA Secretariat and reviews and approves drafts of IRMA's standards for public consultation as well as the final versions ahead of publication.

The IRMA Secretariat: IRMA's team of employees and consultants contracted by IRMA to (among other responsibilities) oversee the development of the IRMA Standard.

Technical Experts: individuals with specific subject matter knowledge and expertise selected by the IRMA Secretariat to assist with the development and revision of IRMA standards and other supporting materials.

Stakeholder: any individual or group that has an interest in any of IRMA's standards and/or any IRMA decision or activity.

Stakeholder Engagement

- 3.1.1. The IRMA Secretariat shall ensure that all stakeholders who may be affected by the implementation of IRMA's standards have the opportunity to comment, formally, during the standard development/revision process.
- 3.1.2. The IRMA Secretariat shall take all reasonable steps to ensure, through a process of stakeholder mapping and active outreach, that the Stakeholder Engagement includes individuals and organizations reflecting the full range of stakeholders affected by IRMA's standards.
- 3.1.3. The IRMA Secretariat will set stakeholder participation goals during the mapping exercise so that there are clear participation targets and success criteria and that these are exhibited across a balance of

interests.

4. Standards Development, Public Consultation, and Revision

4.1. Standards Development

- 4.1.1. The IRMA Secretariat is responsible for developing and revising IRMA's standards with oversight from the IRMA Board of Directors.
- 4.1.2. The IRMA Secretariat shall contract and/or appoint Technical Experts to assist in the development and revision of IRMA's standards in consultation with the IRMA Board of Directors. Members of the IRMA Board of Directors shall be given the opportunity to serve, or designate others to serve, as Technical Experts during the standards development and/or revision process.
- 4.1.3. The IRMA Board of Directors shall review draft standards and proposed revisions and shall decide when a draft standard is ready to be published for formal public review.

4.2. Public Summary and Comment Period

- 4.2.1. At the outset of a standards development or revision process, the IRMA Secretariat shall make publicly available a Public Summary of the consultation and standards development process that shall include a) a summary of the TOR for the standard, including the proposed scope, objectives and justification of the need for the standard; b) the steps in the standard-setting process, including timelines and clearly identified opportunities for contributing; and c) decision-making procedures, including how decisions are made and who makes them.
- 4.2.2. First and subsequent drafts of the IRMA standard including, where applicable, revisions that are being proposed to an approved standard, shall be published on the IRMA website for public consultation together with a summary of key points or proposed revisions.
- 4.2.3. Comments shall be requested and may be submitted through a range of methods that aim to be user-friendly, such as surveys. IRMA will also accept and log written comments, comments communicated via email, and comments shared verbally during workshops, trainings and telephone conversations with members of the IRMA Secretariat.
- 4.2.4. The public consultation phase for the development of a new standard will include at least one round of 60 days and a second round of 30 days during which comments can be submitted by interested parties.

- 4.2.5. The public consultation phase for the review and, where applicable, revision of an approved IRMA standard, will be at least one round of 60 days (see 4.4).
- 4.2.6. Where substantive, unresolved issues persist after the consultation round(s), or where insufficient feedback was received, the IRMA Secretariat and Board of Directors will decide if additional rounds of consultation will be beneficial or necessary.
- 4.2.7. The number of draft standards circulated for public consultation prior to finalization of the standard shall be at the discretion of the IRMA Board of Directors, after a) the review of any issues that are subject to disagreement between stakeholders and taking into consideration the efforts that have been made to resolve any such disagreements and b) the extent to which the draft is considered to contribute to the achievement of IRMA's mission.

4.3. Receipt and Handling of Comments

- 4.3.1. IRMA will consider comments from any IRMA stakeholder. Comments may be attributed to an individual, group, or organization and may also be submitted anonymously.
- 4.3.2. All formal comments submitted on public drafts of new and revised IRMA standards shall be collated by the IRMA Secretariat. The IRMA Secretariat shall prepare a report on the formal comments which includes a summary of the issues raised, an analysis of the range of stakeholder groups who have submitted comments, a general response to the comments, and an indication of how they have been taken into account in the subsequent public draft standard. A copy of all the formal comments shall be included as an annex to the report, which, together with the subsequent public draft of the standard, shall be published on the IRMA website.
- 4.3.3. The IRMA Secretariat shall analyze the sources of comments to verify if formal comments have been received from representatives of all the key stakeholder groups identified as being impacted by the implementation of the proposed standard. The IRMA Secretariat shall be proactive in seeking input from representatives of stakeholder groups that have not yet commented. This shall include making special efforts to help ensure that formal comments are received from representatives of any marginalized groups that may be affected by the standard, and to ensure that specific provisions have been made to explicitly identify and take into account potential impacts of the standard on such groups. These efforts may include implementing alternative mechanisms for gathering comments and feedback, such as organizing consultation workshops and events (virtual or in-person).

- 4.3.4. The IRMA Secretariat will accept formal comments and proposals submitted outside of a formal standards development and/or revision cycle and ensure that the process for this is clearly documented on the IRMA website.

4.4. Review and Revisions of Approved IRMA Standards

- 4.4.1. The IRMA Secretariat shall keep a record of all comments submitted after the approval of the standard (see 4.3.4). These comments will be considered as part of any subsequent formal review or, in the case of comments and proposals related to non-substantive and minor substantive changes, revisions to the standard in question may occur outside of a formal public review process as outlined below.
- 4.4.2. Typographical errors and inconsistencies may be corrected with the approval of the IRMA Secretariat at any time without initiating a formal review process.
- 4.4.3. The IRMA Secretariat may also propose minor substantive changes outside of a formal review process. The IRMA Secretariat shall draft a written justification for the proposed change, which shall be circulated to the IRMA Board of Directors, relevant Technical Experts, and accredited IRMA scheme certification bodies for a 30-day review period. After this 30-day review period the IRMA Secretariat may amend the standard in line with the proposal, taking account of any comments received.
- 4.4.4. In the case of changes resulting from corrections or amendments as described in 4.4.2 and 4.4.3 above, the updated standard shall be clearly identified with a version number and date and the most recent version shall be posted on the IRMA website.
- 4.4.5. Within five years after the approval date of a) any new standard and b) any substantive revision to an existing standard; the IRMA Secretariat shall conduct a review of the standard, to support the IRMA Board of Directors in determining whether a substantial revision is necessary. The decision to substantially revise any standard will consider the following questions:
- a) Accountability: does the standard need to be revised to ensure it remains accountable to all sectors and is aligned with IRMA's mission and vision?
 - b) Currentness: does the standard need to be revised to ensure it reflects the latest scientific understanding in our standard, as well as learning from other standards, policies, and laws?
 - c) Clarity: does the standard need to be revised to make it clearer, more accessible for all stakeholders, and integrate learning from past and ongoing audits?

- d) Consistency: does the standard need to be revised to better harmonize its structure and ensure it remains consistent with established best management systems practice and models?
 - e) Potential gaps: does the standard need to be revised to fill any gaps with stakeholders' expectations, most significant environmental and social issues—including emerging topics—and relevant international norms, laws, regulations or conventions?
- 4.4.6. To enable broad and inclusive participation in the review process, the IRMA Secretariat will prepare a consultation paper and any relevant material highlighting the proposed priority topics for review and revision, if necessary in consultation with Technical Experts, and, with approval of the IRMA Board of Directors, publish such material for a public-consultation period of at least 60 days. The IRMA Secretariat will collect comments and potential issues raised during the review. It will then collate and review all the comments and issues and support the IRMA Board of Directors in taking these into consideration to inform decisions regarding the need for a revision phase to resolve and provide solutions to the issues raised during the review.
- 4.4.7. If the decision to substantially revise a standard is made by the IRMA Board of Directors, as a result of the review process, the standard will be revised in accordance with the procedure described in 4.1, 4.2, and 4.3. The IRMA Secretariat may then also seek approval from the IRMA Board of Directors to initiate additional, but optional, public consultation phases, where deemed appropriate.
- 4.4.8. If, following the initial 60-day public consultation phase (see 4.4.6), it is concluded that the standard will not be revised, a justification and summary of the decision-making process leading to this decision will be made publicly available on the IRMA website (see also section 5).

5. Decision Making

5.1. Approval of New or Revised Standards

- 5.1.1. Decisions to approve drafts of an IRMA standard for public consultation and decisions to approve a final version of an IRMA standard will be made by the IRMA Board of Directors. Decision-making will follow IRMA Bylaws.
- 5.1.2. On completion of the final period for public consultation the IRMA Secretariat shall prepare a report which shall:
- a) summarize the standards development process;
 - b) explain the main issues and concerns raised during the process and explain how these have been addressed;
 - c) include a clear statement regarding whether the process complied with the ISEAL Code of Good Practice;

- d) include a clear description of any departures from IRMA's documented procedures, and an explanation for any such departures;
 - e) include the draft standard; and
 - f) include a summary of all comments received during the last period of public consultation and their treatment.
- 5.1.3 The IRMA Board of Directors shall:
- a) approve and adopt the standard if it affirms that the standard development process was adequate and the standard is consistent with the specifications that the IRMA Board of Directors approved when the standard development or revision process was initiated; or
 - b) not approve the standard if it deems otherwise.
- 5.1.4 If the IRMA Board of Directors does not approve the standard or proposed changes to the standard, it shall state the reasons for this, and will suggest what steps it considers necessary to address its concerns. The IRMA Secretariat shall consider these reasons and propose what further actions should be taken. If these actions result in further revisions to the standard, the standard shall be re-submitted to the IRMA Board of Directors for approval.
- 5.1.5 If the new standard or revised standard receives the approval of the IRMA Board of Directors the standard shall be published within 30 days on the IRMA website. Details of the standard effective dates and transition periods¹, where applicable, will be included in the published standard.
- 5.1.6 The standard may then be implemented, as specified in accordance with its scope and effective dates.

6 Language

- 6.1 The working language for IRMA standard setting shall be English.
- 6.2 The final approved version of all IRMA's standards shall be posted on the IRMA website in English and in Spanish; IRMA will seek to have standards translated into other languages as resources permit to increase stakeholder understanding and engagement.
- 6.3 The reference version of all IRMA standards shall be the English version. All versions in other languages shall include a disclaimer, explaining that in case of doubt the English language version of the standard shall take precedence.

¹ Transition periods are a period of time during which users of a standard must transition from a previous version to the most recent version of the standard. Transition periods will take into account existing certification cycles to ensure a smooth transition.

7 Field Testing and Pilots

- 7.1 As determined useful in creating a successful standard, specific chapters of the standard may undergo field testing or pilots as part of the standards development process.

8 Feedback and Complaints

- 8.1 Any stakeholder has the right to submit feedback and complaints regarding the IRMA Standard and related procedures at any time. Feedback and complaints may be submitted in any language through the IRMA website [Feedback and Complaints Online Form](#) as well as in writing, by post, by phone, by WhatsApp, or verbally (virtually or in person). Feedback and complaints may be submitted anonymously through IRMA's online form. Complaints are managed in a manner aligned with the [IRMA Issues Resolution System Procedure](#).
- 8.2 The IRMA Secretariat shall respond to feedback and complaints related to content of the approved standard by providing an explanation of why a particular point of view was not incorporated into the final standard submitted for approval and/or explaining how the point may be raised again in relation to future revisions of the standard.
- 8.3 Feedback and complaints shall be documented and maintained in the standards comment file for future reference when the standard is reviewed.
- 8.4 The IRMA Secretariat shall respond to feedback and complaints related to procedural issues by discussing possible revisions with the stakeholder and, where relevant, with other parties. If IRMA agrees to a change to the policy or procedure, IRMA shall draft a revision to present to the IRMA Board for review. If IRMA does not agree that a change would lead to improvement, the stakeholder may raise the issue through an Ad Hoc Resolution Committee. A summary of the issue and the resolution shall be published on the IRMA website.

9 Availability of Approved IRMA Standards

- 9.1 Approved IRMA standards shall be available in electronic format and free of charge on the IRMA website.
- 9.2 Printed copies of approved IRMA standards can be made available on request. While IRMA aims to make printed copies available at no cost

upon request, some circumstances may require a reasonable fee to cover administrative expenses such as printing and/or shipping.²

10 Approved Departure from Procedure

- 10.1 Departures from these procedures may be approved by the IRMA Secretariat in consultation with the IRMA Board of Directors in exceptional circumstances, when compliance with the procedure was not possible for reasons beyond the control of IRMA and/or when an alternative process would be in the best interests of the mission of IRMA while meeting the spirit and intent of the ISEAL Code of Good Practice.
- 10.2 The IRMA Secretariat shall document any such departures in writing and publish a summary explaining the nature and the reason or justification for the departure on the IRMA website.

11 Recordkeeping

- 11.1 The IRMA Secretariat shall keep on file, for at least 5 years, the following records in relation to the standards development and revision process which will be made available to stakeholders on request and/or made publicly available on the IRMA website:
 - 11.1.3 Policies and procedures guiding the standard setting process;
 - 11.1.4 Written proposals to revise or develop the standard;
 - 11.1.5 Names and affiliations of individuals consulted on the standard during its revision or development;
 - 11.1.6 Copies of TOR's and Public Summaries published during standards development and standards revision periods;
 - 11.1.7 Copies of public draft standards circulated for comment;
 - 11.1.8 Copies of all comments received on public draft standards;
 - 11.1.9 Summaries of comments received in response to each public draft, together with a synopsis of how those comments were taking into account;
 - 11.1.10 A description of all departures from the specified procedures for standards development, and the actions taken in respect of those departures; and
 - 11.1.11 The decision(s) of the IRMA Board of Directors with regards to the standard setting and review process.

² IRMA does not produce hard copies of its standards or any of the accompanying guidance materials. IRMA will, where feasible, try to accommodate requests for printed copies but withholds the right to decline such requests where it is deemed impractical or prohibitively time consuming and/or costly.

