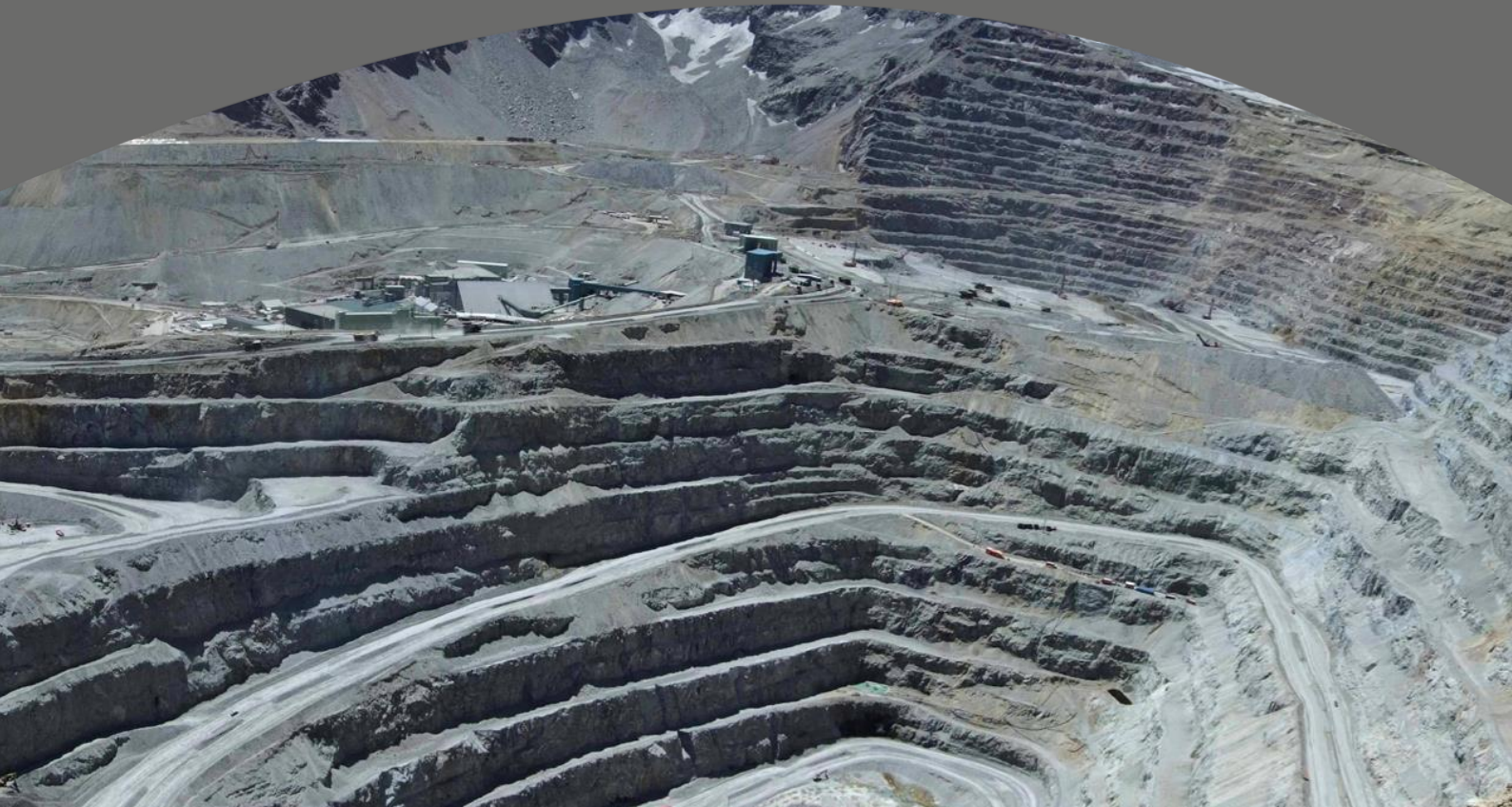




Initiative for Responsible
Mining Assurance

Recognition of IRMA

Over the past several years,
academia, labor unions, indigenous communities,
environmental and social nonprofits, governments
and experts in the field
have referenced IRMA
in various reports and points of communication.



Recognition of IRMA

In March 2017, Germany's Federal Institute for Geosciences and Natural Resources (BGR) authored a comparative overview¹ of 19 sustainability schemes for mineral resources.

In their analysis, the authors noted: "The **IRMA standard is different** from other standards because it is not restricted to certain commodities and **its best practice requirements are recognized by both civil society and large companies**. The Standard for Responsible Mining is already said to become the **most comprehensive and legitimate catalogue** of requirements among all schemes due to its long, intense and democratic stakeholder involvement into the standard-setting process."

In May 2018, Indigenous leaders in British Columbia authored an Op-Ed in the *Vancouver Sun*,² making it clear that business as usual is not an option when it comes to current mining industry practices and related regulations.

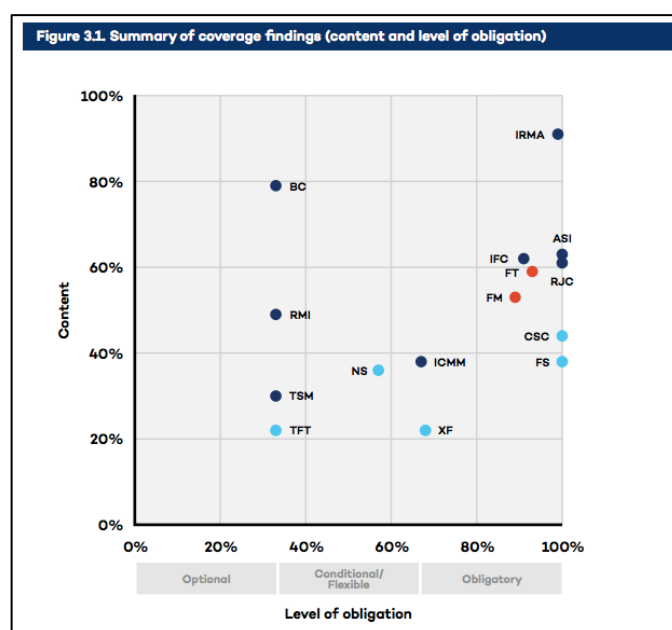
In the piece, these community leaders shared: "An **increasing number of organizations are signing on to the Initiative for Responsible Mining Assurance's (IRMA) Standard for Responsible Mining**, which seeks to emulate for industrial-scale mine sites what has been done with certification programs in organic agriculture, responsible forestry and sustainable fisheries.

"Owners of mines that fail to meet the standard, which includes social and environmental responsibility and third-party verification, risk being **bypassed** as suppliers in much the same way that B.C. forestry companies were shunned until they improved their logging practices."

In September 2018, The International Institute for Sustainable Development (IISD) assessed 15 voluntary sustainability initiatives in mining,³ developing rankings across environmental, social and business related considerations.

In its conclusion, IISD noted, "IRMA comes closest to providing a **comprehensive mining standard** covering every societal indicator relevant to mining."

This finding was illustrated in the Figure 3.1 from the report.



In October 2018, WWF Germany released a report⁴ recommending specific steps to manage the impacts of steel and aluminum production. Throughout the report, IRMA is **singled out as a credible certification scheme** for advancing best practices at the mine.

In December 2018, WWF Russia released an environmental transparency rating⁵ of mining and metals companies operating in the country. IRMA was listed among the international documents **referenced to establish criteria for the ratings**.

In April 2019, over 50 NGOs sent⁶ a joint letter⁷ to the World Bank in support of a just and rapid transition towards a renewable energy economy, while also expressing concerns about impacts from an expected increase in mining to enable the transition.

The group emphasized the importance of scaling back a dependence on mining and called for businesses, financial institutions, and governments to boost recycling and minimize toxicity, shift consumption and transportation, and—in cases when mining is the only option—ensure responsible minerals sourcing.

The group noted that “where sourcing from mining operations is absolutely necessary, purchasers must insist that those operations adhere to **stringent international environmental and human rights best-practices standards (such as those developed by the multi-stakeholder Initiative for Responsible Mining Assurance)** with independent, third-party assurance of compliance.”

In May 2019, the BC Mining Law

Reform Network provided several recommendations⁸ for reform of British Columbia's mining laws. Of the 69 recommendations, four reference IRMA directly:

- Require that all mines in BC **comply with the IRMA standards**, or better, for Waste and Materials Management.
- Enact measurable and enforceable reclamation criteria that **meet or exceed the international standards set in IRMA's Standard for Responsible Mining**.
- **Adopt the IRMA Standard for Responsible Mining water management standards** as minimum requirements in BC's mining laws, including full consultation with communities and stakeholders on critical water-related issues, with third party independent reviews.
- Prohibit mines that are likely to require perpetual water treatment **unless the mine meets the exceptional circumstances set out in the IRMA Standard for Responsible Mining**.

In July 2019, a group of 28 NGOs and trade unions

sent⁹ an open letter¹⁰ to the Responsible Jewellery Council, **recommending the adoption of relevant requirements from IRMA** on several topics, including:

- Water Quality and Quantity
- Mine Waste Management
- Air Quality
- Noise
- Greenhouse Gas Emissions
- Protected Areas
- Biodiversity
- Cyanide
- Mercury
- Environmental and Social Impact Assessment
- Reclamation and Closure

*As a note, both IRMA and RJC aim to support harmonization by working with other willing standards organizations with similar initiatives. Given IRMA focuses on mine-site certification only, it seeks to coordinate with RJC to provide comprehensive requirements for mining which can dovetail with RJC's programs to certify responsible sourcing beyond the mine.

In September 2019, Human Rights Watch shared a public letter¹¹ with South Africa's new administration, calling for bold and concrete steps to protect human rights. In the letter, **IRMA was called out as an "unprecedented international collaboration"** and recommended as a way to drive improved performance at mines.

In March 2020, the Sierra Club issued its first mining policy¹². While the policy recommends mining be kept to a minimum, it also states that "where mining is necessary, **it must be compliant with high-bar environmental and human rights standards** such as IRMA's Standard for Responsible Mining."

In September 2020, OKT Law Firm, a team of lawyers dedicated to advocating for Indigenous communities in Canada, issued a detailed report¹³ comparing selected components of mining regimes throughout the country to IRMA's requirements—the first analysis of its kind.

The authors note: "Comparing [laws and policies] to the IRMA Standard is important in evaluating the extent to which the mining law regime in each jurisdiction **reflects best practices.**"

They also note: "IRMA's standards are a pioneering example of how best to address environmental and social issues in mining."

In September 2020, the Institute for Sustainable Futures (University of Technology Sydney) and the University of Melbourne published a study¹⁴ assessing the merits of various certification schemes in conjunction with efforts to demonstrate Australian materials are produced in accordance with best practices.

They noted: "Several interviewees noted the advantages of the IRMA scheme. These included that **they considered the IRMA certification process to be 'most thorough' and 'best standard and process,' and 'the most comprehensive of existing schemes.'** One noted that the 'standard is very high, in terms of social and environmental impacts; integrity really shows.'"

Based on these interviews and the authors' own research, they concluded that "IRMA is ready for mine site certification now, and appears to offer more advantages (transparency, governance, clear processes), [and] appears to offer a **no-regrets approach.**"

In November 2020, the ISEAL Alliance published a report¹⁵ to support sustainability standards systems in improving the effectiveness of implementing FPIC (Free, Prior and Informed Consent).

The report references past findings and notes: "MacInnes et al (2017) consider **IRMA to be the most promising of extractive industry multi-stakeholder initiatives involving Indigenous peoples.** IRMA recognized early on the importance for indigenous peoples to be directly represented as a key stakeholder in negotiations, rather than a subgroup of NGOs, and **the multi-stakeholder approach to the development of the standard has helped in addressing issues such as FPIC.**"

In November 2020, the New York Declaration on Forests published a report¹⁶ on the urgency of balancing forest protections and development, noting that in the authors' review of mining certification standards, IRMA was found to be "a top performer," going on to say: "**Only IRMA's Standard for Responsible Mining provides detailed guidance and certification for mining operations and explicitly calls for the identification of direct, indirect, and cumulative effects on biodiversity and ecosystem services.**"

In December 2020, the United Nations Framework Convention on Climate Change's Marrakech Partnership published a vision¹⁷ on how the Metals and Mining sector, among others, could achieve net-zero emissions by 2050 while making continuous improvements in their ESG performance.

In laying out the milestones, the authors envision that **by 2025, "major mining companies** have all of their mines independently verified as reducing GHG emissions/energy use and **are measured against leading external ESG standards (e.g. IRMA).**"

In March 2021, the Zimbabwe Environmental Law Association published an article¹⁸ reacting to the audit report of Anglo American's Unki mine in Zimbabwe, released in February 2021.

While there were both commendations and critiques of the mine's performance, the opening paragraph of the piece demonstrates the value IRMA provides communities: "Anglo American's Unki platinum mine operating in Zimbabwe's move to be **assessed against the Initiative for Responsible Mining Assurance (IRMA) comprehensive mining standard** has been **welcomed by locals as a reflection of the company's commitment to transparency and responsible mining.**"

In March 2021, the UK-based NGO War on Want published a report¹⁹ examining the impacts associated with the extraction of transition minerals. They called for international solidarity with those impacted by transition minerals, advancing initiatives focused on fair and just global supply chains, and a reduction in unsustainable material consumption.

In detailing the various certification systems for the mining industry, the authors describe IRMA as “**a genuinely multi-stakeholder certification scheme to develop ambitious standards that improve the social and environmental performance of industrial mining operations, including a comprehensive list of issues featuring human rights due diligence.**”

In March 2021, the US-based environmental NGO Earthworks published a report²⁰ designed to inform downstream users of key environmental, social, and governance issues associated with the extraction and processing of the three battery metals—lithium, cobalt and nickel.

In their recommendations, they call on companies in the EV vehicle battery supply chain to commit to sourcing from “operations [which] **adhere to stringent international environmental and human rights best-practice standards (such as those developed by the multi-stakeholder Initiative for Responsible Mining Assurance).**”

In April 2021, Allen Edzerza, a representative of the First Nations Energy & Mining Council spoke at the Wall Street Green Summit²¹, emphasizing the importance of including the protection of the rights of indigenous peoples when considering ESG (environmental, social and governance) factors.

In this venue, he noted: “[IRMA] **is the only standard that recognizes the rights of indigenous people** whose lands and culture are impacted by exploration and mining projects and has the mandatory requirement of adherence to the UN Declaration Principle of Free, Prior and Informed Consent. If you are an exploration junior, or you are a producer, and you want to show your shareholders you have a demonstrable and verifiable ESG program in your exploration or mining project for critical minerals and metals, then **you must have or be on the pathway to IRMA-type certification.**”

In April 2021, the Green European Foundation shared an agenda for action²² aimed at charting a course towards responsible sourcing of metals for a green and digital Europe.

In the section on responsible sourcing, the authors recommend, “The European Commission should only recognize due diligence schemes that are based on **the highest standards, such as those of the Initiative for Responsible Mining Assurance (IRMA).**”

In May 2021, two leading environmental NGOs published an Op-Ed²³ on the importance of building a circular metals economy focused on recycling, reuse, and reduced demand, avoiding new mining to the greatest extent possible.

That said, if new mining is to occur, both Earthworks and Transport & Environment concurred: “Mining operations must adhere to stringent environmental and human rights standards (**such as those developed by the multi-stakeholder Initiative for Responsible Mining Assurance**) with independent, third-party assurance of compliance.”

In June 2021, E&E News published an article²⁴ on concerns being voiced by U.S. government representatives and nonprofit leaders regarding the flow of pollution from Canadian mines into transboundary watersheds.

The article concludes by sharing perspectives of Mitch Friedman, Director of Conservation Northwest, who is quoted saying: “We need to figure out how to save the sky without destroying our waters. We need better mining.”

The reporters add, “**He advocated for mining policies that reflect the Initiative for Responsible Mining Assurance.** IRMA provides independent certification to verify mines have sound environmental, human rights and social standards.”

As of June 2021, B Lab published *Approach to Controversial Issues and B Corp Certification – Mining Industry*.²⁵

The statement requires a mining company's operations to achieve IRMA 50 to be certified as a B Corp, and to achieve IRMA 75 within six years of initial B Corp Certification to retain B Corp Certification.

The statement adds, “**achievement of IRMA 50 represents a relatively significant level of achievement, and IRMA's multiple tiered approach is designed to enable continuous improvement over time.**”

In June 2021, the environmental NGO Earthworks published a report²⁶ focused on safeguarding community rights, sacred places, and public lands from the push for mining expansion.

In their findings, the authors note the importance of market pressure for incentivizing more responsible mining, noting: “Even with effective regulation, mineral sourcing is **most responsible when pressure comes from mineral purchasers** who see value in better environmental and social governance (ESG). **Market pressure has driven a proliferation of voluntary certification programs** of varying efficacy for nearly each link in mineral supply chains. For industrial-scale mining, the Initiative for Responsible Mining Assurance (IRMA) **sits at the forefront of generating this market value.**”

In June 2021, the White House published a report²⁷ *Building Resilient Supply Chains, Revitalizing American Manufacturing, and Fostering Broad-Based Growth*.

In the report, both the U.S. Department of Energy and the U.S. Department of Defense reference the IRMA Standard as a road map for best practices in mining, saying “IRMA may provide a method for U.S. companies and the Federal Government to ensure that minerals are being **sourced from mines with robust environmental, social, and financial responsibility policies**, and also could provide a model for **responsible development of additional mines in the United States.**”

In July 2021, a leading environmental advocate penned an opinion piece²⁸ for the *Seattle Times* on the risks of expanding the Copper Mountain Mine tailings dam in British Columbia without an environmental assessment, as is currently planned.

In the piece, Denis Hayes relayed, “To be clear, I am not opposed to mining, and I am not opposed to the Copper Mountain Mine. Humankind desperately needs a green-energy revolution, and copper will be indispensable. Leading brands that purchase mined materials, including Microsoft, BMW and Ford Motor Company, know this and are committing to using the **rigorous environmental standard hosted by the Initiative for Responsible Mining Assurance. B.C. needs to catch up to such voluntary measures by adopting and enforcing protective regulations** for Washington watersheds and communities downstream.”

In September 2021, a group of over 150 civil society organizations from five continents sent²⁹ a letter³⁰ to the International Energy Agency, urging the organization to transform its flagship World Energy Outlook report, putting a 1.5°C scenario at the center.

Among the six specific requests collectively made by the group was the following: “Ensure equity and justice with regard to minerals sourcing for clean energy technologies through recycling, circular economy solutions and **independent, verifiable responsible mining criteria such as the IRMA Standard.**”

In September 2021, IUCN unveiled a plan³¹ to develop a collaborative certification system to ensure that the changes resulting from Nature-based Solutions for Societal Challenges (NbS) are truly sustainable.

Under IUCN's NbS certification system, business entities interested in obtaining certification of their Nature-based Solutions intervention will be able to apply for certification through one of several existing sustainability certification schemes recognised by IUCN, namely the Forest Stewardship Council, the Gold Standard, **the Initiative for Responsible Mining Assurance**, FairTrade International, and the Global Sustainable Tourism Council.

In October 2021, the Kimberley Process Civil Society Coalition (the umbrella organization that acts as an observer of the Kimberley Process on behalf of civil society) shared a press release³² urging diamond and jewelry businesses genuinely committed to responsible diamond sourcing to endorse four commitments—

Among these is the commitment to undertake on-going, proactive and reactive due diligence of their supply chains. To do so, the group recommended using IRMA as a “**promising standard**,” stating, “IRMA offers the only third-party, arms-length certification of industrial-scale mine sites for all mined materials that is **co-created and governed equitably by the private sector (mining and purchasing), local communities, civil society, and workers.**”

In October 2021, the European Environmental Bureau and Friends of the Earth Europe published a study³³ titled *Green Mining is a Myth*, illustrating how the EU is extracting and consuming a dangerous proportion of the world's limited resources, with serious consequences.

In the report, the groups name IRMA as “the **leading standard on good mining practices**” and call for “mandatory IRMA certification for the metal and mineral mining sector through the EU Taxonomy Regulation” and go on to clarify that “**unlike weaker standards (e.g. CERA, UNGP, OECD Guidelines), IRMA certification happens at the mine site, rather than the company-level, and follows a step-by-step approach as opposed to a pass or fail one. This breakdown provides better transparency about each activity and prevents companies from making overarching claims about their operations.**”

In October 2021, 170+ signatories from human rights and environmental organizations, grassroots communities and unions from 30 countries

worldwide sent³⁴ a declaration³⁵ to COP 26 climate negotiators, calling on them to commit to centering human rights and environmental impacts of mining, including for battery minerals.

The groups also urged negotiators to prioritize low-impact circular economy solutions and **ensure responsible minerals sourcing through adherence to stringent international environmental and human rights standards with independent, third-party verification of compliance, such as the IRMA Standard for Responsible Mining.**”

In October 2021, SUMEX (Sustainable Management in EXtractive Industries—a three-year project funded by the European Commission) announced³⁶ the release of a report describing the sustainability aspects that should be considered for the European extractive industry in the fields of carbon neutrality and circular economy.

The organization noted, “the project suggests one common standard to describe what responsible extraction should mean in the EU **and suggests to use the IRMA Standard to describe the criteria that a responsible extractive operation should fulfill today.**”

In November 2021, the Kimberley Process Civil Society Coalition gave the first speech at the Kimberley Process Plenary,³⁷ opening the forum with a “reality check.”

In his address, Shamiso Mtisi, stated, “This forum has often discussed the challenges related to artisanal and small-scale mining. Yet, in our view it has not given sufficient attention to those associated with large-scale mining.

Problems with industrial mines are less common, but if things go wrong, the impact tends to be much more devastating and leaves communities powerless in a David v. Goliath battle with colossal corporate interests.

There is a solution available to detect and mitigate problems more readily, but it has not yet made its way in the diamond sector. I refer to the Initiative for Responsible Mining Assurance, which is the only third-party, arms-length certification of industrial scale mining for all mined materials that is co-created and governed equitably by the private sector, local communities, civil society, and workers. **The KP CSC calls for IRMA certification for all industrial diamond mines.”**

In November 2021, the European Parliament passed a resolution³⁸ on a European strategy for critical raw materials.

In the document, the parliament “welcomes the EU’s commitment to responsible and sustainable sourcing and **encourages the Commission to take the Standard for Responsible Mining developed by the Initiative for Responsible Mining Assurance as a starting point**, [...] stressing the need to mobilise more state and private actors to also subscribe to and implement sustainability standards.”

In December 2021, IUCN of The Netherlands published an article,³⁹

commending the European Parliament’s resolution regarding IRMA, “hoping also the Netherlands will promote certification with this demanding standard for responsible mining” as well.

The authors relay that **“voluntary performance standards to which mining companies can commit are an important addition to existing laws and regulations** because these sector-wide standards often impose stricter sustainability requirements.

IUCN NL therefore encourages companies to publicly commit to such standards, **especially the progressive IRMA Standard.**

This standard was developed by a multi-sector coalition consisting of mining companies, purchasing companies (such as jewelers and electronics manufacturers), NGOs, labour unions and mining affected communities. **Also, IUCN NL and its partner organizations that are committed to the protection of vulnerable ecosystems have actively provided input during the consultation rounds.”**

In December 2021, several of the world’s leading ocean advocates sent⁴⁰ an open letter to the Biden administration,⁴¹ requesting presidential support of a moratorium on deep seabed mining.

In addition to this request, the group asked for the government to “take steps to meet the demand for critical minerals through sustainable, circular economy policies, including advanced recycling and domestic processing paired with mining reform and **better international sourcing requirements, such as the IRMA Standard.”**

In May 2022, IRMA’s Executive Director attended a meeting at the White House⁴² joining 20 representatives from states, Tribes, the mining industry, environmental groups, labor unions, automakers and legal experts to discuss the need for reforms and improvements **to establish strong standards** that would allow for the responsible development of hardrock minerals in the United States.

In June 2022, Re-Sourcing—a three-year project funded by the European Commission—⁴³ highlighted IRMA as one of four good practice cases in the mobility sector, titled: Responsible Procurement of Minerals by Using a Strong Standard.

As part of this case study, **IRMA and BMW discussed the unique elements which make IRMA a strong standard** and noted how companies can use IRMA in assessing their supply chains.

In June 2022, Germany's Federal Institute for Geosciences and Natural Resources (BGR) authored the report⁴⁴: *Sustainability Standard Systems for Mineral Resources: A Comparative Overview*.

When comparing IRMA to other standards the authors noted: **"In contrast, IRMA [has] a stronger focus on social aspects which might be also a result of the strong multi-stakeholder approach."**

In July 2022, the United Kingdom's Department for Business, Energy and Industrial Strategy published a policy paper: ⁴⁵ *Resilience for the Future: The UK's Critical Minerals Strategy*.

In the section titled: Resilience Through ESG Performance, **IRMA is listed as a globally recognized framework** which could contribute to "role model standards for sustainable development of resources in the UK" and "protect the interests of communities and our natural environment."

In September 2022, Germanwatch, a Bonn-based NGO, published *An Examination of Industry Standards in the Raw Materials Sector*.⁴⁶

In comparing IRMA to other independent extractive standards Germanwatch determined that, unlike all other evaluated standards, IRMA satisfied the majority of its evaluation metrics. Regarding audits in they remarked, "we should emphasise in particular here the certification report by IRMA, which provides detailed and differentiated information about the knowledge acquired within the scope of the audit and sheds light on details on the state of implementation [where others do not]. **IRMA shows that transparent communication is possible.**"

In November 2022, the Clean Vehicles Director at Transport & Environment, was quoted in an article⁴⁷ sharing three pillars which must be part of the European Union's Critical Raw Materials Act.

In addition to recommending any mines in Europe meet best-practice standards, Julia Poliscanova noted: "Although domestic production is the goal, imports will be inevitable. It means transparent and diverse markets, **supported by strong sustainability standards such as the Initiative for Responsible Mining Assurance (IRMA)**, are key to guaranteeing responsible supply."

In November 2022, the German Association of the Automotive Industry (VDA) which represents more than 620 companies submitted public comment regarding the EU Critical Raw Materials Act to the European Commission endorsing IRMA.⁴⁸

"[The VDA member companies] are committed to greater transparency, respect for human rights and the sustainable extraction of raw materials. **Therefore, the EU CRMA Raw Materials Act should support the IRMA as the recommended industry standard for mining.**"

In November 2022, the World Wildlife Fund issued the report⁴⁹: "The Future is Circular: Circular Economy and Critical Minerals for the Green Transition."

The authors acknowledge the need for continued primary extraction and call for change of course towards a less harmful mineral supply. **IRMA is described in this section, being the only mining standard mentioned**, as providing "a verification and certification for a more socially and environmentally responsible mining."

In January 2023, Philippe Varin, commissioned by the French Ministries of Ecological Transition and Industry to produce a Jan 2022 report on securing energy transition minerals for French industry, was interviewed by Euractiv.⁵⁰

In stressing that “mines should be responsible by complying with the ‘clearest and most binding standards possible’, **he included “the standard proposed by the Initiative for Responsible Mining Assurance, comprising environmental impacts, works’ health, respect for human rights, and financials transparency in the mining sector.”**

In January 2023, during the World Economic Forum (WEF) at Davos, the leaders of Natura & Co. and WWF International published⁵¹ “Why business and finance should prioritise a nature-positive Amazon” on the WEF website.

In describing global importance of the Amazon, its severe degradation and mining’s ongoing role in that decline, **the authors call upon “business and finance to promote certification by Initiative for Responsible Mining Assurance.”**

In February 2023, the International Platinum Group Metals Association (IPA) published a webpage “Responsible mining and sourcing”⁵² and an associated case study⁵³ of the Unki mine’s IRMA audit.

In explaining their dedication to responsible sourcing they declare that **the mining members of the IPA have committed to be independently audited against the IRMA Standard** or one other standard.

In March 2023, the European Automobile Manufacturers’ Association (ACEA) published a position paper⁵⁴ welcoming the announcement by the European Commission of the Critical Raw Materials Act (CRMA).

To “strengthen the availability of critical raw materials for Europe’s industries” the paper recommends **“assessing the suitability of initiatives such as the Initiative for Responsible Mining Assurance.”**

In March 2023, Lead the Charge – a diverse network of local, national and global advocacy partners working for an equitable, sustainable, and fossil-free auto supply chain released a scorecard⁵⁵ of major automobile manufacturers’ supply chains assessing their environmental, human rights, and responsible sourcing performance.

In addition to using commitment to IRMA as part of the scoring rubric, the methodology of the scorecard offers that **“to drive change at the level of extraction companies may join the Initiative for Responsible Mining Assurance (IRMA).** IRMA is the only third-party certification of industrial scale mine sites for all mined materials that is governed equitably by the private sector, local communities, civil society, and workers.”

In May 2023, the Union of Concerned Scientists published a report providing “Guidance for Electric Grid Infrastructure Decisionmakers and Stakeholders”⁵⁶.

The report only mentions IRMA by name as a **“standard that aims to reduce the damage caused by resource extraction.”**

The May-June 2023 edition of The Environmental Law Initiative’s *The Debate* published a multi-sector discussion “How Can U.S. Safely Mine Minerals Critical to a Carbon-Free Economy?” which included an article by Earthworks’ Payal Sampat entitled “Transition Must Be Just, Equitable and Responsible”.⁵⁷

In it she recognizes that “reforms start with the rules governing mining” and that **“some leading automakers and electronics companies are already asking suppliers to undergo assessments by the multi-sector-governed Initiative for Responsible Mining Assurance.**

In May 2023, Human Rights Watch

published a Q&A⁵⁸: “EU’s Flawed Reliance on Audits, Certifications for Raw Materials Rules”.

Even as the authors describe third-party audits as “inherently limited”, they explain that HRW is an IRMA board member because IRMA is “**unique among mining sector standards initiatives because it is equally governed by civil society and the private sector.**” And “**the combination of IRMA’s equal governance system, its detailed standard, and its public audit reports makes it the comparatively strongest standard that mining companies can use to provide transparency on their conduct and practices.**”

In June 2023, Morningstar-

Sustainalytics Associate Director for Stewardship, Joris Laseur published a blog⁵⁹: “Raising the Bar in Mining and Minerals for the Cleantech Supply Chain: The Role of Multi-Stakeholder Initiatives.”

In discussing the shift towards renewables, Mr Laseur notes that “metals need to be mined responsibly and then become part of the circular economy,” and that “**two initiatives have emerged as leaders in the supply chains of cleantech equipment: Aluminium Stewardship Initiative (ASI) and the Initiative for Responsible Mining Assurance (IRMA).**”

In June 2023, the University of Technology, Sydney (UTS)

researchers Rusty Langdon and Elsa Dominish posted about “The Energy Conundrum”⁶⁰ to answer the question “We could need 6 times more of the minerals used for renewables and batteries. How can we avoid a huge increase in mining impacts?”

Langdon and Dominish answered this question in part by referencing their research which “**identified the Initiative for Responsible Mining Assurance as one of the more rigorous standards,**” and then asked “How do practices in Australia measure up to [IRMA]?”

In September 2023, the Alliance for Tompotika (AlTo)

released a video⁶¹ – “Tompotika: Forests Nickel and Critical Choices” -- highlighting the pressure of increasing nickel demand on Indonesia’s Tompotika tropical rainforest on Sulawesi and the threat it poses to critically endangered species



To the extent that mining must occur in Tompotika, in the video AlTo says it “**must occur according to mining best practices by applying the IRMA Standard for Responsible Mining.**”

In September 2023, Oxfam America

released a report “Recharging Community Consent: Mining companies, battery minerals, and the battle to break from the past”⁶² which concludes “in general the battery mineral sector’s approach to free, prior, and informed consent (FPIC) is not sufficiently ready to support a just energy transition under current company policies.”

To address this unreadiness, Oxfam unequivocally endorses IRMA, “**Major lithium producers need to be recognized as being some of the first to undertake credible, third-party assurance of their social and environmental performance, including FPIC implementation, in accordance with the Initiative for Responsible Mining Assurance (IRMA).**” It also gives kudos to those lithium producers that have audited their operations against the IRMA Standard.

In September 2023, the Biden-Harris Administration's Interagency Working Group on Mining Laws, Regulations and Permitting published its

"Recommendations to Improve Mining on Public Lands"⁶³.

It positively calls out the IRMA Standard for special attention among voluntary mining standards, "This report endorses the adoption of a number of components of voluntary standards—particularly ones from the IRMA standard developed by a multi-stakeholder coalition comprised of the mining industry, end-users, environmental and human rights NGOs, labor organizations, and others."

In September 2023, the Berkeley Center for Law, Energy and the Environment (CLEE), and Ceres, an NGO

working with capital market leaders to solve world sustainability challenges, published "Electric Vehicle Batteries: A Guidebook for Responsible Corporate Engagement Throughout the Supply Chain."⁶⁴

The Ceres/CLEE guidebook recommends that EV battery manufacturers "Indicate a preference for batteries with minerals from IRMA-certified suppliers" and "Become a member of IRMA [to] publicly demonstrate a commitment to responsible sourcing."

In September 2023, Climate Action 100+, an investor-led initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change, published "Investor Expectations for Diversified Mining."⁶⁵

In section 9.iii "Aligning with core best practices for the acceleration for of [transition mineral] mining" they suggest "that IRMA be considered the primary independent responsible mining [verification] when assessing indicator 9.iii because of its multistakeholder governance system that specifically allocates equal governing power to each of the represented stakeholders: communities, workers, NGOs, mining companies, companies that purchase mined materials, and investors."

In September 2023, RMI authored an opinion piece eGreenews⁶⁶: "To Decarbonize We Must Invest in the U.S. EV Battery Supply Chain."

As RMI discusses how to meet U.S. domestic electric vehicle battery demand, they unequivocally endorse IRMA, "Any extraction must be done responsibly and meet the Initiative for Responsible Mining Assurance (IRMA)'s responsible mining standard."

In October 2023, the NGO Transportation & Environment, tagline "Europe's leading clean transport campaign group," released a briefing report "Paving the way to cleaner nickel."⁶⁷

The briefing recommends "robust standards" naming only IRMA "to improve environmental and social stewardship."

In October 2023, the IUCN | National Committee of the Netherlands, published an article "How the IRMA standard guides sectors towards responsible mining."⁶⁸

The article "urges the public and business sectors in The Netherlands, the European Union and elsewhere to adhere to the IRMA Standard for Responsible Mining, with an eye for the interests of both nature and people."

In December 2023, Transportation & Environment authored the study, "Pedal to the Metal"⁶⁹ "asking how prepared are European carmakers for EV value chain transformation." "To Decarbonize We Must Invest in the U.S. EV Battery Supply Chain."

One of the study's "Key recommendations" is "quicker adoption of best-in-class global standards (such as IRMA)," the only mining standard mentioned. A company's commitment to the IRMA Standard is used as part of the study's "Responsible supply chain practices" metric.

In December 2023, Recourse published “Tread Lightly: Why IFIs should put people and the environment at the centre of the transition mineral supply chain.”⁷⁰

One of the study’s “Key recommendations” is **“quicker adoption of best-in-class global standards (such as IRMA),”** the only mining standard mentioned. A company’s commitment to the IRMA Standard is used as part of the study’s “Responsible supply chain practices” metric.

In February 2024, 29 investors managing US\$1.2 trillion signed a statement demanding companies enhance their environmental and social due diligence in nickel supply chains of the electric vehicle industry.⁷¹

The 29 signatories endorsed VBDO and Rainforest Foundation Norway’s investor statement⁷² which uniquely mentions IRMA as **“one key initiative in this area which downstream companies can support by joining directly but also by prioritising sourcing from mines audited by IRMA and requiring their own suppliers to be audited by IRMA.”**

In February 2024, the IndustriALL Global Union published a Mining Indaba recap “Reflecting on labour and community gains at the Mining Indaba.”⁷³

The recap described IRMA as **“a valuable tool which integrated ILO standards, OECD guidelines and human rights due diligence. This integration created a culture of industrial peace, accountability, and meaningful dialogue between workers, communities, and mining companies.”**

In February 2024, Lead the Charge, a network of 14 local, national, and global advocacy partners published “An Assessment of Third-Party Assurance and Accreditation Scheme.”⁷⁴

Lead the Charge assessed IRMA as a **“robust scheme”** that **“was the strongest performer by a considerable margin”** among the eight systems evaluated, and meets **“nearly all of the minimum criteria for governance, auditing, and/or accreditation.”**

In March 2024, the NGO Transportation & Environment published a memo “EU Battery Regulation – Due diligence rules: what next in the implementation?”⁷⁵

The memo’s recommendations to companies include **“Source from IRMA-audited mines, directly or indirectly”**.

In March 2024, the BC First Nations Energy and Mining Council the Charge, published “BC First Nations Critical Minerals Strategy.”⁷⁶

Recommendation 19 of the strategy says **“First Nations, in their sole and absolute discretion, may require all mineral projects, including critical minerals projects, be assessed and audited by the world’s leading mining standard created by the Initiative for Responsible Mining Assurance (“IRMA”).** The IRMA audit process is transparent, independent and voluntary. The IRMA process is analogous to forest certification processes, such as the Forest Stewardship Council. Industry mining standards and certification schemes are biased processes and not supported by most First Nations.”

In April 2024, the NGO Mighty Earth published “From Forests to Electric Vehicles: Quantifying and Addressing the Environmental Toll of Indonesian Nickel.”⁷⁷

The first recommendation of the report includes **“we strongly encourage all actors to join the Initiative for Responsible Mining (IRMA) and adopt its standards. IRMA is the only independent third-party program for assessing industrial-scale mine sites for all mined materials. It is governed equally by the private sector, communities, civil society, and workers.”**

In April 2024, 39 civil society organizations submitted a letter in response to a “Request for Comments on Promoting Supply Chain Resilience” by the United States Trade Representative.⁷⁸

The letter requests the USTR to **“ensure that critical minerals operations meet all standards set in the Indigenous Peoples and Free, Prior and Informed Consent chapter of IRMA.”** The letter also calls on the USTR to require the IRMA Occupational Health & Safety chapter, as well as **“all environmental responsibility and other related standards set in IRMA.”**⁷⁹

In April 2024, Lead the Charge, a network of 14 local, national, and global advocacy partners submitted a letter to the International Organization for Standardization (ISO) urging them to strengthen their upcoming supply chain standard.⁸⁰

Part of the letter strongly endorses IRMA, **“There are fundamental criteria that standards must include to be credible and effective at protecting people and the planet. The Initiative for Responsible Mining Assurance (IRMA) contains these elements and more, which is why there is broad consensus within civil society that IRMA is the strongest mining standard and should serve as the baseline for any global guideline on critical mineral supply chains.”**

In April 2024, the NGO Cultural Survival Indigenous Peoples’ representatives

issued a press release **“Ford Sustainability Report Shows Important Progress on the Rights of Workers and Indigenous Peoples but Disappoints on Clean Steel and Aluminum.”**⁸¹

The release declares that **“Sourcing from an IRMA-audited mine is a step in the right direction**, but Ford can and should do more to leverage its influence to safeguard its supply chain from human rights and environmental harms. The next step for Ford is to publicly disclose its timeline for demanding that all mines in its supply chain undergo IRMA audits.”

In April 2024, the United Nations Secretary-General appointed a **“Panel on Critical Energy Transition Minerals.”**⁸²

Composed of representatives of state and non-state actors, **IRMA was included alongside other non-state actors such as the World Bank and IRMA member IndustriALL Global Union.**

In April 2024, 87 Indigenous Peoples’ representatives issued the **“Declaration of Indigenous Peoples’ Participants in the Conference on Indigenous Peoples and the Just Transition.”**⁸³

The declaration includes **“Companies must recognize and respect the right to FPIC, which also means the right to say no, in their policies, procedures and practices in all projects, recognizing and emphasizing the self-determined development of Indigenous Peoples. The International [sic] Responsible Mining Assurance (IRMA) policy on FPIC must be the minimum standard for mining companies.”**

IRMA Board Members

representing the NGO, labor, and community sectors

Glen Mpufane, IndustriALL Global Union
 Jim Wormington, Human Rights Watch
 Meg Gingrich, United Steelworkers
 Meshack Mbangula, Mining Affected Communities United in Action (South Africa)
 Pavel Sulyandziga, Batani (Russia)
 Payal Sampat, Earthworks

IRMA Members

representing the NGO, labor, and community sectors

Alliance for Tompotika Conservation (ALTO)
 Batani Foundation
 Center for Environmental Governance
 Center for Science in Public Participation
 Earthworks
 Fauna & Flora International
 First Nations Women Advocating Responsible Mining (FNWARM)
 Foundation for Community Driven Development
 Geology in the Public Interest
 Gila Resources Information Project
 Good Governance Africa
 Great Basin Resource Watch
 Human Rights Watch
 IndustriALL Global Union
 IUCN Netherlands
 Mighty Earth
 Mining Affected Communities United in Action (MACUA)
 North of England Institute of Mining and Mechanical Engineers
 Oxfam America
 PACT
 Population and Development Initiative (PDI) Tanzania
 Rivers Without Borders
 Settle Ghana
 Society for Threatened Peoples
 Transport & Environment
 United Steelworkers
 Wilp Luutkudziwus
 Zimbabwe Environmental Law Association (ZELA)

About IRMA: IRMA envisions a world where the mining industry respects the human rights and aspirations of affected communities; provides safe, healthy and supportive workplaces; minimizes harm to the environment, and leaves positive legacies. IRMA offers objective, independent third-party verification of industrial scale mine sites against a comprehensive definition of responsible mining agreed to through a collaborative, multi-stakeholder process. This definition, which forms the basis of IRMA's Standard for Responsible Mining, covers the full range of issues related to the impacts of mining.

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