



Interim Policy On Auditing During Exceptional Circumstances (COVID-19)

VERSION 1.0

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Responsibility for this Policy

The IRMA Secretariat holds responsibility for this document and its content.

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1.0	28 Oct 2020	First publication, after review by IRMA Board

Definitions

Conventional Stage 2 Audit: An audit that occurs at the mine site and surrounding environs in accordance with IRMA Certification Body Requirements (incorporating any deviations authorized in Section 1, below, as necessary).

Partial Stage 2 Audit: An audit conducted either entirely using remote technologies to gather and review information and interact with auditees and stakeholders, or that combines some remote aspects with a scaled-down on-site component (e.g., a hybrid audit).

Remote Audit: Remote audits refer to the use of information and communications technologies to gather information, conduct interviews, etc., when in-person methods are not possible or desired. (ISO 19011)

Hybrid Audit: An audit where an auditor is on-site and is connected in real-time, for significant portions of time, via communications technologies (e.g., audio-visual links) to a lead auditor or more experienced auditor/external expert. (SAAS, 2020)

Background

IRMA has developed this Interim Policy on Auditing During Exceptional Circumstances (COVID-19) (i.e., “Interim Policy”) in recognition that due to COVID-19 there will likely continue to be intermittent local, regional and international travel restrictions, and also potential risks to life or health related to COVID-19 for the foreseeable future.

This document has been prepared after a review of similar policies developed by other voluntary certification schemes. See [Appendix 1](#) for more information on policies and resources reviewed.

This document defines additional expectations and exceptions to IRMA mine site assessment processes for as long as this Interim Policy remains in effect. Some of these requirements apply to mine sites while others apply to certification bodies.

With this Interim Policy, IRMA seeks, above all, to ensure that auditors are not put at risk while carrying out IRMA assessment activities, and that mine management, mine workers and mine stakeholders are not put at risk through contact with external auditors during an IRMA assessment carried out while there is a global COVID-19 pandemic (or other similar exceptional circumstances).

IRMA recognizes that mines already engaged, or interested in engaging with IRMA, seek some guarantee that if they begin the assessment process, they will be able to finalize their audit within a suitable timeframe, and that their investment of time and resources will have the potential to lead to a recognized level of achievement that they can share publicly.

Additionally, IRMA understands that approved certification bodies have invested in building capacity to carry out IRMA audits and need to sustain enough activity to ensure the viability of their IRMA programs.

Finally, this Interim Policy has been carefully designed to ensure that IRMA 3rd-party independent assurance process remains credible with all of IRMA's various stakeholders. As a result, this policy presents interim auditing options and provisional achievement levels shared with full transparency in regards to the limitations of audits carried out while this Interim Policy remains in effect.

IRMA will seek feedback from participating mines and certification bodies to inform a real-time evaluation of this Interim Policy, and will update the policy as necessary. For example, if best practices become more evident or if an evaluation of audits carried out as per this policy suggest that changes to the policy are warranted, the policy may be updated.

1. Conventional Stage 2 Audit Option

EXPLANATORY NOTE: There may be circumstances where a Conventional Stage 2 Audit, with on-site visits of mine site facilities and in-person interviews with workers and mine stakeholders, can safely take place. However, given the potential risks to mine management, workers, stakeholders and auditors of in-person interactions, IRMA seeks to ensure that both the mine site and certification body have carried out adequate due diligence to ensure the health and safety of all concerned, and that they have put in place appropriate strategies to prevent potential exposure or spreading of COVID-19 during mine site assessment activities.

IRMA is especially concerned about potential health and safety risks related to in-person, group interviews with affected stakeholders/community members that take place in a community setting, where auditors may not have the ability to adequately verify that infection control measures have been sufficient. IRMA strongly recommends that the certification bodies undertake a rigorous risk assessment before such group interviews take place.

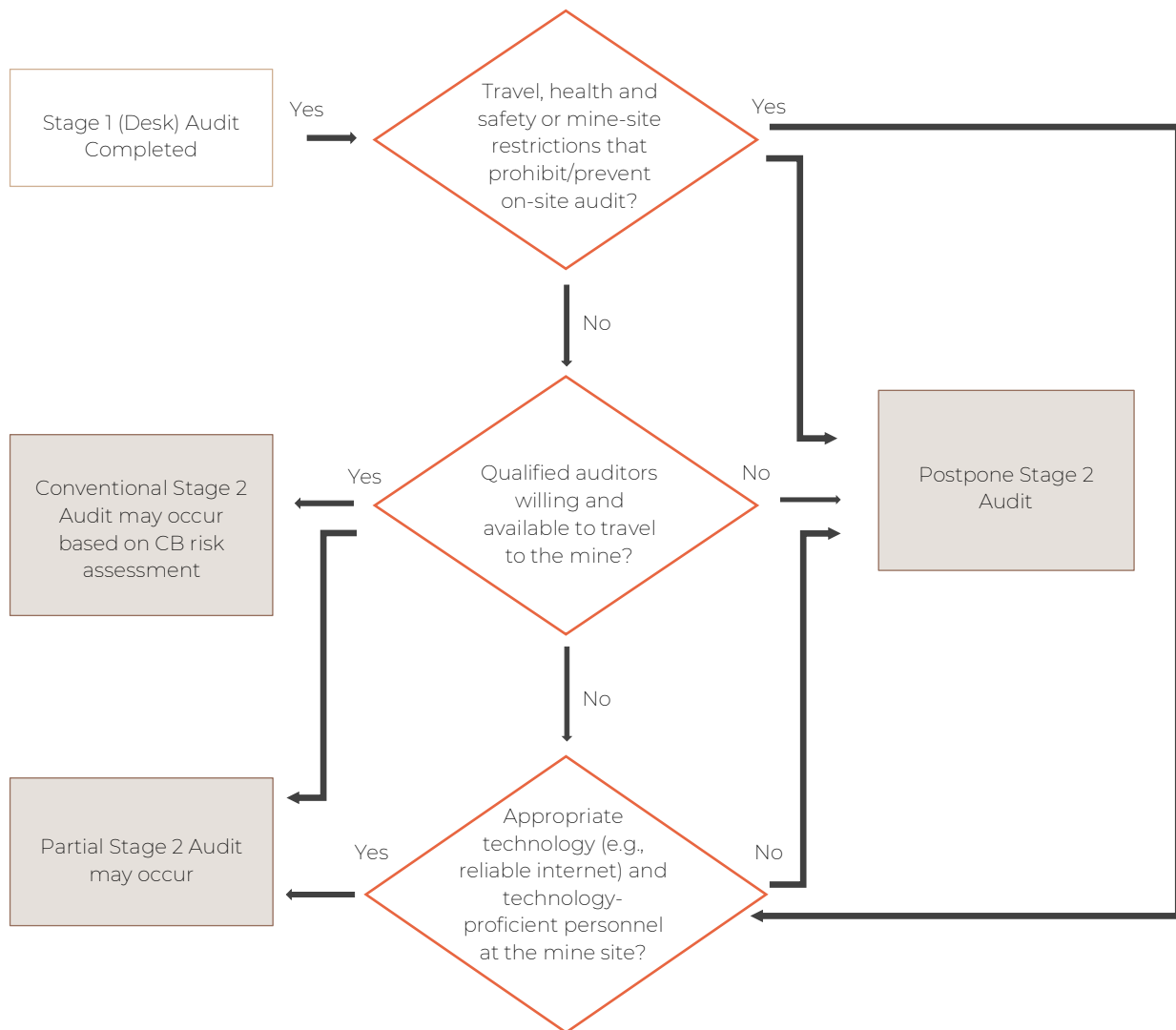
Where in-person interactions may pose even a moderate risk to stakeholders or auditors, IRMA recommends that a Partial Stage 2 Audit be carried out (see Section 2.2).

1.1. Risk Assessment and Management

For as long as this policy remains in effect, prior to commencing a conventional Stage 2 audit, the IRMA Director of Standards and Assurance must receive:

- a. Written attestation from the certification body and the mine site that each has evaluated the risks related to an on-site audit and that both parties agree to proceed;
- b. A copy of a risk analysis from the certification body that includes, at minimum:
 - i. Evidence that local, national and international laws and regulations allow for travel to the host country and within the host country of the mine site under assessment.
 - ii. Information on all current laws and regulations related to social distancing and infection control (e.g., use of face coverings, or requirements related to testing, quarantining, etc.) in effect at the mine site or in any neighboring areas that may be visited during the on-site audit, and a plan for how those regulations will be followed and any residual risks managed.
 - iii. Agreement from the certification body that prior to any in-person interviews, they will obtain signed or verbal agreement from interviewees to demonstrate that interviewees have been informed of potential risks related to in-person interviews and that they have provided their consent to be interviewed.
 - iv. Written attestation from all audit team members that they have been informed of potential risks related to on-site audits and are willingly participating in the audit.

STAGE 2 AUDIT DECISION CHART



1.2. Evaluation of COVID-19 Health and Safety Measures

EXPLANATORY NOTE: The IRMA Standard for Responsible Mining includes chapters on Occupational Health and Safety (Chapter 3.2) and Community Health and Safety (Chapter 3.3), which include requirements related to protections for worker health and safety, and also emerging infectious diseases. IRMA shall provide additional guidance on auditing related to these requirements that must be followed for all Stage 2 Audits. In particular, the guidance will address the assessment of a mine site's response to COVID-19 as it relates to worker and community health and safety.

For as long as this policy remains in effect, certification bodies shall follow the Interim Guidance for Chapters 3.2 and 3.3 of the IRMA Standard for Responsible Mining when assessing a mine's performance against the requirements in those chapters.¹

1.3. Audit Outcome and Decision-Making

If a conventional Stage 2 audit is able to take place, then as per IRMA's certification body requirements the certification body will make the final decision on the mine site's achievement level (i.e., Section 3 of this policy does not apply).

2. Interim Mine Site Assessment Process

EXPLANATORY NOTE: Currently, initial certification audits are broken into two stages.

Stage 1 is a desk review of a mine site's self-assessment, and includes the use of communications technologies (e.g., IRMA's on-line self-assessment/audit preparation system, email, telephone) by auditors and mine management to discuss documentation and potential gaps in the self-assessment. All Stage 1 activities typically occur remotely, and as a result, this Interim Policy does not affect Stage 1.

Stage 2 is the on-site portion of the audit. It includes site tours, additional document review, and in-person interviews with mine management, mine workers, government officials, local stakeholders and members of affected communities. Based on an analysis of the policies and protocols of voluntary certification systems, IRMA has learned that certain remote audit activities are increasingly being used to verify an auditee's performance,² however, there are also risks and limitations related to their use that must be acknowledged and, where possible, mitigated.³ (See [Appendix 1](#) and [Appendix 2](#) for more information)

IRMA also recognizes that full verification of some IRMA requirements will not be possible without either on-site observation or in-person interviews with particular stakeholders or rights-holders.

¹ Auditors should request this Guidance from the IRMA Director of Standards and Assurance. Guidance will include, for example, the need for auditors to make sure that appropriate COVID-19 protective measures are in place at the mine site. These may include health checks, testing, quarantine procedures, etc., and that measures are being taken and followed to prevent/minimize the opportunity for transmission of the virus between workers and nearby communities.

² For example, according to ISO 9001, "New information and communication technologies (ICT) have made remote auditing more feasible. As access to ICT has increased, remote auditing has become more commonly used. This allows the auditor to communicate with people globally, accessing a wide range of information and data. (ISO &IAF. 2020. p. 3).

In a report prepared for ISEAL Alliance the authors found that: "The majority (75%) of organisations adopted remote auditing practices where onsite audits were not possible and developed new procedures to implement them. However, organisations are still in the phase of learning and experimentation for what credible remote auditing looks like, with remote auditing of social standard requirements emerging as a challenge." (Staniaszek et al., 2020, p. 17)

³ ISO &IAF. 2020. pp. 3, 11, 12.

This Interim Policy offers two options for Stage 2 of the initial certification audit:

1. Postpone Stage 2 for up to 6 months (See 2.1.1)
2. Carry out a Partial Stage 2 Audit (see 2.2.1 – 2.2.3)

Because not all IRMA requirements can be fully verified using existing remote technologies and techniques, the outcome of a Partial Stage 2 Audit (see Section 2.2) can only lead to a provisional certification or achievement level (see Section 2.2.5)

2.1. Extension of Audit Timeframes

EXPLANATORY NOTE: IRMA's Certification Body Requirements⁴ require that:

—Stage 2 of an Initial Certification audit take place within 12 months of the closing meeting of Stage 1 of the audit.

—Surveillance audits are required to be carried out 12-18 months after a certification/achievement level decision has been made.

This Interim Policy recognizes that there may be extenuating circumstances preventing mines from carrying out audits within these required timeframes. The following paragraphs outline the manner in which IRMA will grant extensions related to the timing of Stage 2 of an initial certification audit and the timing of a subsequent surveillance audit.

2.1.1. Time between Stage 1 and Stage 2 of an Initial Certification Audit

- a. For as long as this policy remains in effect, IRMA will allow all mines to postpone Stage 2 of its initial certification audit for up to six (6) months past the normal 12-month period. This extension may be requested by contacting IRMA's Director of Standards and Assurance.
- b. Where laws or regulations continue to prohibit travel and/or limit the ability for in-person interactions, or risk assessments carried out by certification bodies or the mine demonstrate unacceptable risks to auditors, mine site staff, mine workers or stakeholders, the mine site may request an extension to the initial 6-month postponement by contacting the IRMA Director of Standards and Assurance. Length of extensions will be granted on a case-by-case basis.

2.1.2. Time between Initial Certification Audit and Surveillance Audit

- a. For mines that have already been fully audited, IRMA will grant extensions to the permissible period between the initial certification audit and surveillance audit on a

⁴ See pp. 25 and 32 of IRMA's Certification Body Requirements. https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

case-by-case basis. The postponement shall not exceed six (6) months beyond the conventional 12- to 18-month period described in the Explanatory Note. Extensions shall be based on whether or not an on-site visit is necessary, and whether or not there are additional extenuating circumstances that may prevent the surveillance audit from being safely and effectively carried out.

- b. Where laws or regulations continue to prohibit travel and/or limit the ability for in-person interactions, or risk assessments carried out by certification bodies or the mine demonstrate unacceptable risks to auditors, mine site staff, mine workers or stakeholders, the mine site may request an extension to the initial 6-month postponement by contacting the IRMA Director of Standards and Assurance. Length of extensions will be granted on a case-by-case basis.

2.2. Interim Audit Option: Partial Stage 2 Audit

EXPLANATORY NOTE: Partial Stage 2 Audits, for the purposes of this Interim Policy, are audits that are either done entirely using remote technologies to gather and review information and interact with auditees and stakeholders,⁵ or audits that combine some remote aspects with a scaled-down on-site visit (i.e., a hybrid audit). (See [Appendix 2](#) for more details on remote auditing options and potential risks and opportunities).

2.2.1. Use of remote auditing techniques and technologies

- a. Any remote auditing techniques and technologies used during the partial audit shall be agreed by the certification body and mine site. Evidence of such agreement shall be made available to IRMA upon request.
- b. Prior to commencing a Partial Stage 2 audit, the certification body shall ensure that appropriate technology is available for carrying out remote auditing techniques, including internet connection with suitable bandwidth at the mine site and other relevant locations, and that mine site and audit staff are competent and at ease with the use of the technology.
- c. Upon request, certification bodies shall share with IRMA's Director of Standards and Assurance and/or IRMA's Assurance Oversight Committee a list of remote auditing techniques proposed for use during the Partial Stage 2 audit.
- d. Following the completion of the Partial Stage 2 Audit, certification bodies will provide feedback to IRMA on the effectiveness of the technologies and techniques used during the audit.

⁵ Definition amended from: Staniaszek et al., p. 10.

2.2.2. Use of remote interviews

- a. If there is more than one person being interviewed at the same time from the same location, the interview shall, at a minimum, be conducted in accordance with all legal requirements related to social distancing and infection control measures (e.g., face coverings, maximum group sizes, appropriate ventilation, etc.).
- b. Partial Stage 2 Audits shall include remote interviews with mine site management and other relevant mine supervisory staff, if technology allows;
- c. Partial Stage 2 Audits may include interviews with workers if 2.2.2.a has been met and:
 - i. Certification bodies have consulted with legitimate workers' organizations active at the site, if any, or have otherwise carried out research to assess whether or not worker interviews can be carried out in a free and fair manner (i.e., participation is voluntary and free of manipulation, coercion or influence by mine management).
 - ii. Worker interviewees provide written agreement or otherwise demonstrate (e.g., through verbal agreement at the beginning of the interview) that they are participating voluntarily.
 - iii. Interviews are not recorded.
 - iv. The number of remote worker interviews does not exceed 50% of the required number of worker interviews for Stage 2 (See [Appendix 3](#)), i.e., at least half the required number of worker interviews must occur in-person, when that option becomes available,⁶ and
 - v. Technologies used for remote worker interviews must allow for a full view of the interview room, the ability to pan the entire room, or another method determined by the certification body to demonstrate that interviews are being undertaken without the presence of mine management.
 - vi. If interpretation is required, the interpreter must be agreed by the workers' organization and the certification body. If no workers' organization exists, the certification body must take reasonable efforts to ensure that the interpreter is not a member of mine site management and is otherwise free from influence by mine management.
- d. Partial Stage 2 Audits may include interviews with stakeholders as follows:
 - i. Partial Stage 2 Audits may include remote interviews with government employees, if agreed by the employee and his/her/their respective agency;
 - ii. Partial Stage 2 Audits may include interviews with individual stakeholders who have requested an interview, if technology allows;
 - iii. Partial Stage 2 Audits may only include remote interviews with groups of stakeholders or affected community members if the certification body has

⁶ Given some of the potential challenges identified with worker interviews by other schemes, at this time IRMA is limiting the number of remote mine worker interviews to no more than 50% of the number of interviews required for IRMA assessments. This will allow IRMA to test whether or not remote worker interviews can be an effective method of verification by comparing various elements (e.g., willingness to provide feedback, type and extent of information shared, etc.) with in-person worker interviews.

- determined with a high degree of certainty that congregation of stakeholders for the purpose of a remote interview will not endanger the health of participants.⁷
- iv. Regardless of whether or not some stakeholders are interviewed remotely, there must be some in-person community-based interviews when that option becomes available.
 - e. Upon request, certification bodies shall share with IRMA's Director of Standards and Assurance and/or IRMA's Assurance Oversight Committee a list of proposed remote interviewees, and methods and technologies proposed for carrying out the interviews.

2.2.3. Scheduling a subsequent on-site visit and in-person interviews

- a. The certification body shall document all requirements that could not be fully assessed through remote means and therefore additional activities (e.g., interviews, observations) need to be conducted during a site visit.
- b. The on-site portion of the audit, along with relevant and required in-person interviews, shall take place as soon as realistically possible, and preferably no more than six months after the provisional achievement level decision (see Section 2.2.5), or
- c. Where laws or regulations continue to prohibit travel and/or limit the ability for in-person interactions, or risk assessments carried out by certification bodies or the mine demonstrate unacceptable risks to auditors, mine site staff, mine workers or stakeholders, then the mine site shall request an extension by contacting the IRMA Director of Standards and Assurance. Extensions will be determined on a case-by-case basis.

2.2.4. Interim auditor ratings during Partial Stage 2 Audit

EXPLANATORY NOTE: Under the current system, auditors rate the conformity of a mine's performance against each of the relevant the requirements in the IRMA Standard. These "core" rating options include:

- o Fully Meets
- o Substantially Meets
- o Partially Meets
- o Does Not Meet

Some requirements in the IRMA Standard can likely be assigned a rating with a high degree of confidence during a Partial Stage 2 Audit (e.g., if a requirement asks that a policy, a procedure or a plan be developed, a mine should be able to demonstrate this solely by providing documents to the auditor in electronic format).

⁷ For example, certification bodies may need to review case levels of COVID-19 in mine-affected communities to evaluate if they are low enough to provide confidence that allowing interviewees to congregate will not lead to spread of the virus, and also determine if proposed remote interview locations and technologies enable safe participation (either through adequate social distancing or other means).

Other IRMA Standard requirements, however, require site-based observations and/or input from external stakeholders to either support documentation that has been reviewed, or to be the major source of verification of a mine's performance. As a result, after completion of a Partial Stage 2 Audit, auditors may only have a moderate or low degree of confidence in their rating for some requirements.

Consequently, IRMA has created the two additional rating options for Partial Stage 2 Audits. The auditor assessment tool has been revised so that auditors can identify which requirements can only be deemed as "interim findings" as a result of the partial audit, and also which requirements "cannot be rated" until an on-site audit has been completed. (See [Appendix 4](#)).

Table 1 in [Appendix 5](#) provides guidance on chapters that will likely produce at least some interim ratings because of the need to obtain stakeholder or worker input through in-person interviews or the need to perform on-site observations. [Appendix 6](#) provides guidance on the critical requirements in the IRMA Standard, and which ones are likely to require interviews or on-site observations.

For as long as this Interim Policy remains in effect, auditors carrying out Partial Stage 2 Audits will be able to provide unqualified ratings (i.e., fully, substantially, partially or does not meet) that are considered "final", if they believe that the evidence supports it. However, auditors will also be provided with two additional rating options:

- **Interim Finding** – This option may be selected if auditors have at least moderate confidence in the rating (e.g., fully, substantially, partially, does not meet) based on evidence gathered during desk review and the partial Stage 2 audit. A rating flagged as an interim finding means that the auditor has identified that additional verification via on-site observation and/or in-person interviews is necessary in order to have a high degree of confidence about the rating.
- **Cannot Be Rated** – This option may be selected in lieu of any rating. Auditors will select this when they either have no evidence, or have low confidence in the evidence provided. This rating is likely to be selected when verification relies heavily on observation of implementation of practices, or relies substantially on input from others (e.g., workers, affected communities, other stakeholders).

2.2.5. Provisional achievement levels/certification

EXPLANATORY NOTE: In the IRMA system, the IRMA Director of Standards and Assurance exercises an oversight role in the assurance process, and has the opportunity to review the draft audit report and provide comments to the certification body. The ultimate decision on a mine's achievement level, however, rests with the certification body.⁸

As part of its own due diligence to test and review the applicability and potential risks to IRMA's credibility of using remote auditing techniques as part of the IRMA assurance process, IRMA is reserving the right to make a final determination on a mine's provisional achievement level based

⁸ Typically, within the IRMA system certification bodies make the final decision related to a mine site's certification / achievement level in the IRMA system, based on an evaluation of evidence.

on recommendations of an Assurance Oversight Committee (see Section 3.1). This process will be followed for as long as this version of the Interim Policy is in effect.

- a. Mines that have completed a Partial Stage 2 Audit may be awarded a provisional achievement level until such time that a final achievement level can be awarded (i.e., after the on-site component has been completed).
- b. Upon completion of the Partial Stage 2 Audit, the certification body shall make a recommendation to IRMA on whether or not a mine should be granted a provisional achievement level. Factors to be considered in whether or not to allow provisional achievement level/certification include, at minimum:
 - i. The weight of evidence that was available for review,
 - ii. The number and nature of the requirements that could not be fully audited, and the potential risks of issuing a provisional achievement level while the outcomes of those particular requirements are not fully known,
 - iii. If there are any critical requirements that could not be rated,
 - iv. Review of any written stakeholder comments received that raise questions about mine site performance that were unable to be addressed or verified during the Partial Stage 2 Audit.
- c. IRMA reserves the right to make a final determination as to a mine site's provisional achievement level for any audit that includes remote elements and deferred on-site visits and interviews. The final determination will be based on recommendations from an Assurance Oversight Committee, following the committee's review of a draft audit report prepared by the certification body upon completion of the Partial Stage 2 Audit (See Section 3.1.3).

2.2.6. Interim public summary audit reports if provisional achievement awarded

EXPLANATORY NOTE: In the IRMA system, mines are not recognized as having reached an achievement level until a public summary audit report is released. For a provisional achievement level to be recognized, mines will similarly need to disclose a public summary of their audit results. This transparency is especially important for provisional results because stakeholders will want to understand the basis of a provisional achievement level – which requirements have been fully verified and which ones still need additional verification before ratings can be finalized and a final achievement level awarded.

For as long as this version of the Interim Policy is in effect, the public summary audit reports will need to include a section on limitations of Partial Stage 2 Audits. Examples of such statements include:

“Due to COVID-19 travel restrictions and/or health and safety considerations, the mine site has not yet fully completed Stage 2 of its audit. Consequently, the results in this report are provisional only. A final achievement level will only be granted after an on-site visit and in-person interviews have taken place.”

“The results in this audit report are provisional only, because auditors were not able to perform a full Stage 2 audit with an on-site visit and in-person interviews due to COVID-19 travel restrictions and health and safety considerations. To date, auditors have been able to review documentation

and carry out some remote interviews and mine-site observations. However, until it is safe to travel to the mine site, tour mine facilities and hold in-person meetings, the mine's performance ratings cannot be finalized nor a final achievement level granted."

When the on-site audit component has been completed, an updated audit report will need to be released to reflect all audit activities and final ratings, chapter scores, auditor comments and achievement level.

To be publicly recognized as receiving a provisional achievement level, mines must release an interim public summary audit report that includes:

- a. All relevant sections of a typical public summary audit report;
- b. Information on limitations of the Partial Stage 2 audit;
- c. Clear identification of requirements that still require on-site verification and/or in-person interviews before the rating can be finalized.

3. Oversight of Implementation of Interim Policy

EXPLANATORY NOTE: Typically, IRMA exercises oversight of the mine site assessment and certification bodies by observing audits, and also by reviewing the draft audit report.

Given the potential risks to IRMA's credibility and accountability with its stakeholders, IRMA has decided to exercise extra oversight as we evaluate the implementation and effectiveness of the use of remote auditing technologies and techniques.⁹ IRMA will maintain an Assurance Oversight Committee for as long as this version of the Interim Policy remains in effect.

3.1. Assurance Oversight Committee

3.1.1. Purpose of the Assurance Oversight Committee

IRMA shall convene an Assurance Oversight Committee to:

- a. Review Partial Stage 2 Audit results and provide a recommendation to IRMA on whether or not a provisional achievement level should be granted, and
- b. Provide the IRMA Board with feedback on the implementation and effectiveness of this Interim Policy and recommendations to change or improve the policy.

⁹ According to the report *Sustainability Auditing Good Practices in Response to COVID-19*, which was prepared for the ISEAL Alliance: "As COVID-19 policies are evolving with many new requirements for CBs and auditors, it's important to continue to maintain oversight...Organisations are maintaining oversight of CBs and auditors through observation of remote audits and review of audit reports." (Staniaszek et al. 2020, p. 17)

3.1.2. Assurance Oversight Committee activities

- a. Prior to the granting of a provisional achievement level and the release of a public summary audit report, the Assurance Oversight Committee shall review the draft audit report prepared by the certification body.
- b. The committee may request to meet with the certification body and/or the mine site management team to obtain clarifications on technologies used and processes followed, information on challenges related to implementation of procedures outlined in this policy, or other information deemed relevant in assessing the credibility of the audit results and/or the risks to IRMA of granting a provisional achievement level.
- c. The Assurance Oversight Committee shall make a recommendation to the IRMA Director of Standards and Assurance on whether or not a provisional achievement level should be granted

3.1.3. Recommendations on the Interim Policy

After each audit review, the Assurance Oversight Committee shall provide feedback to the IRMA Board on the implementation and effectiveness of this policy, and, if relevant, make recommendations on revisions to the policy.

APPENDIX 1—References and Resources on Remote Auditing

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APPENDIX 2—Remote Auditing Options, Risks and Opportunities

“Remote audits refer to the use of ICT (information and communication technologies) to gather information, interview an auditee, etc., when “face-to-face” methods are not possible or desired.” (ISO 19011)

List of potential remote auditing technologies:¹⁰

- Electronic video conferencing tools (e.g., Microsoft Teams, Zoom, etc.) used for virtual meetings (e.g., opening and closing interviews)
- Smart glasses – a form of mixed reality that incorporates features such as touchpad, camera and interactive display.¹¹
- Visual assistance platforms – enable users to connect through reality-powered platforms using a mobile application or smart glasses to solve problems and exchange information in real time.
- Worker voice applications – communications options to engage workers, including options for receiving complaints or allegations.
- Drone technology – aerial vehicles that are piloted remotely that may be used for land surveys and environmental monitoring, or capturing video footage of a site.
- Recent, high-resolution satellite imagery

Potential Opportunities of Remote Auditing¹²

New information and communication technologies (ICT) open the opportunity to:

- Audit sites and people remotely, shortening travel time and costs, reducing the environmental impact associated with audit travel, and adapting audits to different organizational models.
- Help to increase the size or quality of sampling in the audit process, when prepared, validated and used properly. This is the case, for example, when using video cameras, smart phones, tablets, drones or satellite image to verify physical settings such as pipe identification in the petroleum industry, machinery settings, storage areas, production processes, or forest or agricultural sites.

¹⁰ From Staniaszek et al., 2020, pp. 14 and 15.

¹¹ “Two versions were tested by IOAS and Control Union, Microsoft Hololens and Google Glass, with Control Union adopting them into their Hybrid audit service. There was no formal feedback on their usage, and they need to be more thoroughly tested. However, both tools are expensive, with one interviewee commenting they would not expect to deploy this type of expensive equipment widely.” (Staniaszek et al., 2020, p. 14)

¹² For more detailed list of risks with specific types of technologies see ISO & IAF, 2020 (pp. 11, 12) Annex: Example of identification of Risks and Opportunities for using remote audit techniques.

- Use of ICT also allows for the inclusion of expertise in an audit that otherwise might not be possible due to financial or logistical constraints. For example, the participation of a technical expert may only be needed to analyze a specific project for only two hours.
- With ICT available, the technical expert may be able to analyze the process remotely, thereby reducing time and costs associated with travel.

Potential Limitations and Risks of Remote Auditing¹³

We must consider the limitations and risks posed by ICT in the fulfilment of audit objectives. These include information security, data protection and confidentiality issues, and veracity and quality of the objective evidence collected, amongst others.

The following are questions that may arise.

- When watching images, are we looking at real time images or are we looking at video records?
- Can we capture everything about the remote site or are we being guided by selected images?
- When planning for a remote interview, will there be a stable internet connection and will the person to be interviewed know how to use the relevant technology?¹⁴
- Can the processes and sites to be audited be realistically audited offsite?
- Can you have a good overview of the facilities, equipment, operations, controls? Can you access all the relevant information?

Many of these questions can only be answered after a visit to the site.

Worker interviews remain one of the most challenging areas of remote auditing.

— Staniaszek et al., 2020, p. 17

Although livestream videos can be used to tour a facility, they can miss some important factors when assessing health and safety. These include peripheral vision, sounds, smells and particularly the facial expression of workers. Auditor health and safety onsite is also a cause of concern, and routine health and safety assessments are a must before each audit.

— Staniaszek et al., 2020, p. 13

In some situations' security requirements will not allow for the use of ICT.

¹³ For more detailed list of opportunities with specific types of technologies see ISO & IAF, 2020 (pp. 11, 12) Annex: Example of identification of Risks and Opportunities for using remote audit techniques.

¹⁴ A weak bandwidth or limited hardware capability may slow the process to the point of inefficiency. The audit process may be affected by the speed at which the auditee access and shows evidence by video, or through a tablet or computer. (ISO & IAF, 2020, p. 5)

- Critical to the use of ICT are confidentiality and security issues, as well as data protection. The CB and the organization should take into consideration legislation and regulations, which may require additional agreements from both sides (e.g. there will be no recording of sound and images, or authorizations to use people's images), and possibly from the auditee itself. Where applicable by National law, the DPO (data protection officer) of both organizations should be involved in assessing these issues.

— ISO & IAF, 2020, p. 5

APPENDIX 3—Required Worker Interviews

This table is from page 34 of IRMA's Certification Body Requirements. Worker interviews are those carried out within the general worker population, not mine management.

Table: Number of worker interviews and time spent (for stage 2 and recertification audits).

# of mine site workers (including contractors)	# of individual interviews	# of group interviews	Total workers interviewed	Total time spent on interviews (hours)**
1 - 10	*	*	*	0.75
11 - 25	2	1 x 3	5	1
26 - 100	3	(2 x 2) and (1 x 3)	10	3
101 - 250	6	3 x 3	15	4
251 - 500	10	(2 x 3) and (1 x 4)	20	5
501 - 800	15	(2 x 3) and (1 x 4)	25	7
801 - 1,200	15	(1 x 3) and (3 x 4)	30	7
1,201 - 2,000	20	(2 x 3) and (1 x 4) and (1 x 5)	35	9
2,001 - 3,000	20	(2 x 3) and (1 x 4) and (2 x 5)	40	9
3,001 - 6,000	25	(2 x 3) and (1 x 4) and (2 x 5)	45	11
6,001 - 10,000	25	(2 x 3) and (2 x 4) and (1 x 5) and (1 x 6)	50	11
10,001 - 15,000	30	(2 x 3) and (2 x 4) and (1 x 5) and (1 x 6)	55	13
15,000 - 20,000	30	(2 x 3) and (2 x 4) and (2 x 5) and (1 x 6)	60	14

* As deemed appropriate by the certification body's lead auditor

** Approximate time

APPENDIX 4—Interim Auditor Ratings

Three examples are included below to illustrate how auditors will rate the requirements.

Example 1: Final Finding

1.3.1.1. The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights.









The auditor could assign a **final** “fully meets” rating, for example, if the mine provides an electronic version of the plan that fully conforms with the requirement. A finding will be considered final if the auditor has not marked the circle labeled “Interim Finding.”

Auditor rating	Mine's self-Assessment rating
<input checked="" type="radio"/>	<input checked="" type="radio"/> Fully Meets The mine has an emergency response plan that includes all of the components in the UN APELL for Mining (listed in Appendix I). NOTE: the expectation is that the company meet the intent (e.g., address all of the categories), not the letter of the components outlined in Appendix 1 of the UN APELL for Mining.
<input type="radio"/>	<input type="radio"/> Substantially Meets The mine has an emergency response plan that includes most of the components mentioned in the UN APELL for Mining (listed in Appendix I).
<input type="radio"/>	<input type="radio"/> Partially Meets The mine has an emergency response plan but only includes a few components mentioned in the UN APELL for Mining (listed in Appendix I).
<input type="radio"/>	<input type="radio"/> Does Not Meet The mine does not have an emergency response plan.
<input type="radio"/>	<input type="radio"/> Cannot Be Rated Rating withheld until on-site verification and/or in-person interviews have been completed.
<input type="radio"/>	<input type="radio"/> Interim Finding Rating will be finalized after on-site verification and/or in-person interviews have been completed. Rating could change based on new information.

Example 2: Interim Finding

1.2.1.3. The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).

The auditor could assign an **interim** “fully meets” rating, e.g., if the mine shows broad consultation on design of engagement processes and that barriers have been addressed. But auditors will still need to interview stakeholders to understand if stakeholders agree that identified barriers have been effectively addressed before they make a final determination.



Auditor rating	Mine's self-assessment rating
	 Fully Meets The operating company consults with a broad range of stakeholders to design engagement processes; and The operating company demonstrates that continuous efforts are taken to understand barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups), and there is evidence that identified barriers have been effectively addressed.
	 Substantially Meets The operating company consults with a broad range of stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate; and The operating company makes an effort to understand if there are barriers to engagement, and makes an effort to remove barriers, but there is inadequate evidence to show that barriers have been successfully addressed.
	 Partially Meets The operating company consults with some but not a broad range of stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate; and/or The operating company makes an effort to understand if there are barriers to engagement, but when barriers are identified the company does not do anything or does very little to remove those barriers.
	 Does Not Meet The operating company did not/does not consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate; and The operating company does not try to understand if there are barriers to engagement.
	 Cannot Be Rated Rating withheld until on-site verification and/or in-person interviews have been completed.
	 Interim Finding Rating will be finalized after on-site verification and/or in-person interviews have been completed. Rating could change based on new information.

Example 3: Cannot Be Rated

3.2.2.5. In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:

- a. Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment;
- b. Ensure that the mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons;
- c. Maintain the stability of the ground in areas to which persons have access in the context of their work;
- d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface;
- e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted;
- f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards;
- g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and
- h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location.

The auditor cannot rate this requirement because the auditor needs to verify, through observation, that controls and protections are being effectively implemented.

Auditor rating	Mine's self-assessment rating
	<div style="display: flex; align-items: center;"> <input type="radio"/> <div style="margin-left: 10px;"> <p>Fully Meets</p> <p>The operating company has developed and implemented a set of procedural controls that address, at minimum, the issues listed in 3.2.2.5.</p> </div> </div> <div style="display: flex; align-items: center;"> <input checked="" type="radio"/> <div style="margin-left: 10px;"> <p>Substantially Meets</p> <p>The operating company has developed and implemented a set of procedural controls that effectively address many but not all of the issues listed in 3.2.2.5.</p> </div> </div> <div style="display: flex; align-items: center;"> <input type="radio"/> <div style="margin-left: 10px;"> <p>Partially Meets</p> <p>The operating company has developed and implemented a set of procedural controls that address some of the issues listed in 3.2.2.5.</p> </div> </div> <div style="display: flex; align-items: center;"> <input type="radio"/> <div style="margin-left: 10px;"> <p>Does Not Meet</p> <p>The operating company has either not developed or has not implemented procedural controls to address the issues listed in 3.2.2.5.</p> </div> </div> <div style="display: flex; align-items: center;"> <input type="radio"/> <div style="margin-left: 10px;"> <p>Cannot Be Rated</p> <p>Rating withheld until on-site verification and/or in-person interviews have been completed.</p> </div> </div>
	<div style="display: flex; align-items: center;"> <input type="radio"/> <div style="margin-left: 10px;"> <p>Interim Finding</p> <p>Rating will be finalized after on-site verification and/or in-person interviews have been completed. Rating could change based on new information.</p> </div> </div>

APPENDIX 5—IRMA Chapters with on-site or in-person auditing components

This table is non-normative, and should be considered as a general reference only. It is possible that this table will be updated in future revisions to this policy, based on learnings from the first remote audits.

Note: It is assumed that interviews with mine site management will take place during verification for all chapters of the IRMA Standard.

	Stakeholder input	Worker input (non-management)	Mine site observation	Comments
Principle 1: Business Integrity				
Chapter 1.1—Legal Compliance	Maybe	No	No	Depending on the availability of documentation, auditors may need to interview government employees to corroborate information.
Chapter 1.2—Community and Stakeholder Engagement	Yes	No	No	In-person interviews with stakeholders will be necessary if it is not possible to do interviews remotely.
Chapter 1.3—Human Rights Due Diligence	Yes	Maybe	No	Most human rights risks and impacts will be related to communities, and some in-person group and possibly individual interviews will be needed to determine if potential and actual impacts have been assessed and addressed. Interviews with mine workers will also be required if the human rights risk assessment or other information identifies potential or actual risks to worker's human rights.
Chapter 1.4—Complaints /Access to Remedy	Yes	No	No	In-person interviews with stakeholders will be necessary if it is not possible to do interviews remotely. Workers' grievance mechanism is addressed in Chapter 3.1, and interviews for that chapter would need to cover grievance mechanism.
Chapter 1.5—Revenue and Payments Transparency	No	Maybe	No	There may be a need to interview workers on the issue of bribery and corruption.

	Stakeholder input	Worker input (non- management)	Mine site observation	Comments
Principle 2: Planning for Positive Legacies				
Chapter 2.1—Environmental and Social Impact Assessment and Management	Yes	No	Maybe	<p>While much of this chapter can be verified through document review, interviews with stakeholders will be needed to ascertain if they have been engaged in environmental and social management planning and monitoring. Likely these interviews will happen in person, when the auditors are able to meet with larger groups of community members.</p> <p>Mine site observations may be necessary to verify that management measures are being implemented as per the environmental and social management plan.</p>
Chapter 2.2—Free, Prior and Informed Consent	Yes	No	No	
Chapter 2.3—Community Support and Benefits	Yes	No	No	
Chapter 2.4—Resettlement	Yes	No	Yes	
Chapter 2.5—Emergency Preparedness and Response	Yes	Yes	Yes	<p>On-site observation provides validation that emergency equipment is suitable, available and in working order, and insight into any actual risks that should be included in emergency preparedness and response plans.</p> <p>Interviews with mine workers will be key to understanding if emergency response plans have been developed with their input, and also to determine if workers understand the procedures necessary to protect themselves and fellow workers during emergencies.</p>
Chapter 2.6—Planning/Financing Reclamation and Closure	Yes	No	Maybe	If reclamation is underway, auditors will need to view it first-hand.
Principle 3: Social Responsibility				
Chapter 3.1—Fair Labor and Terms of Work	Maybe	Yes	Yes	There may be the need to interview outside stakeholders such as government officials or external unions or labor organizations.

	Stakeholder input	Worker input (non-management)	Mine site observation	Comments
Chapter 3.2—Occupational Health and Safety	Maybe	Yes	Yes ¹⁵	There may be the need to interview outside stakeholders such as government officials, local health clinics, or external unions or labor organizations.
Chapter 3.3—Community Health and Safety	Yes	Maybe	Maybe	IRMA's chapter on Community Health and Safety includes elements related to emerging infectious diseases that may require worker input. Also, depending on the risks to community health and safety, auditors may need to observe mitigation measures.
Chapter 3.4—Conflict-Affected and High-Risk Areas	Yes	Maybe	Maybe	Operating in a conflict-affected and high-risk area will pose risks to communities. In some cases, there will also be direct risks to some mine site employees (e.g., those transporting minerals), so interviews with these workers will be required if the conflict risk assessment identifies potential or actual risks to them.
Chapter 3.5—Security Arrangements	Yes	Maybe	Yes	Depending on the context, it may be necessary to interview workers if security arrangements, pose risks to them (e.g., during collective bargaining negotiations or legal strike situations or in situations where the right to freedom of association is questionable, or if there are risks to mine site employees due to conflicts with nearby communities). Security personnel, themselves, should be interviewed to determine if they are aware of company procedures and trainings. On-site observation is important to determine if security personnel are following the procedures.
Chapter 3.6—Artisanal and Small-Scale Mining	Yes	Maybe	Yes	It may be important to interview mine workers to better understand if there might be potential or actual conflict between themselves and ASM miners.
Chapter 3.7—Cultural Heritage	Yes	Maybe	Maybe	If the mine management or stakeholders have identified cultural heritage resources that should be protected, then auditors will need to interview relevant workers to determine if they understand the protections that the mine has developed.

¹⁵ "Although livestream videos can be used to tour a facility, they can miss some important factors when assessing health and safety. These include peripheral vision, sounds, smells and particularly the facial expression of workers. Auditor health and safety onsite is also a cause of concern, and routine health and safety assessments are a must before each audit." (Staniaszek et al., 2020, p. 13)

	Stakeholder input	Worker input (non-management)	Mine site observation	Comments
				Also, on-site observations would need to take place to ensure that the protections have been implemented effectively.
Principle 4: Environmental Responsibility				
Chapter 4.1—Waste and Materials Management	Yes	Yes	Yes	<p>Some stakeholder engagement requirements in this chapter may not be relevant at existing mines. However, at all mine sites, stakeholders must be engaged in emergency preparedness and response plans related to waste facilities. So, at minimum, some in-person interviews will be needed to ensure that stakeholders were engaged and understand the response plans.</p> <p>Relevant mine site management and workers engaged in waste management activities (e.g., those involved in moving waste, implementing mitigation, monitoring waste facilities, etc.) will need to be interviewed to ensure they understand the waste policy and their roles in implementing the policy.</p>
Chapter 4.2—Water Management	Yes	Yes	Yes	<p>Stakeholders must be interviewed as part of the verification for this chapter.</p> <p>Relevant mine site management and workers engaged in water management activities (e.g., implementing mitigation, sampling and monitoring, etc.) will need to be interviewed to ensure they understand the water management strategies and their roles in implementing the strategies.</p>
Chapter 4.3—Air Quality	Maybe	Yes	Yes	<p>Stakeholders should be interviewed if there are air quality related complaints.</p> <p>Relevant mine site management and workers engaged in air quality management activities (e.g., implementing mitigation, sampling and monitoring, etc.) will need to be interviewed to ensure they understand the air management strategies and their roles in implementing the strategies.</p>
Chapter 4.4—Noise and Vibration	Maybe	Maybe	Maybe	<p>This chapter does not apply to noise within the workplace (that is covered in Chapter 3.2).</p> <p>Interviews with affected stakeholders and on-site observations are necessary if complaints or other information suggest that off-site receptor (e.g., nearby communities) may be affected by noise and/or vibrations from the mine.</p>

	Stakeholder input	Worker input (non-management)	Mine site observation	Comments
				Relevant mine site management and workers engaged in noise management activities (e.g., mitigation, monitoring, responding to complaints) may need to be interviewed and observations of mitigation measures undertaken if noise or vibration complaints exist.
Chapter 4.5—Greenhouse Gas Emissions	No	No	No	
Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	Yes	No	Maybe	<p>Depending on the mitigation strategies, there may be the need to observe mitigation measures first-hand to verify effective implementation.</p> <p>Relevant mine site management and workers engaged in biodiversity management activities (e.g., implementing mitigation, sampling and monitoring, etc.) will need to be interviewed to ensure that they understand the prevention and mitigation measures in place to protect biodiversity, ecosystem services and protected areas, as relevant, and their roles in implementing the measures.</p>
Chapter 4.7—Cyanide Management	No*	Yes	Yes	<p>Stakeholders interviews are not needed for this chapter, per se. However, if cyanide has the potential to affect communities (e.g., transport through communities, spills that could affect drinking water) then cyanide should be included in discussions related to emergency preparedness and response (see Chapter 2.5), to determine if communities are aware of response measures in place.</p> <p>Relevant mine site management and workers engaged in cyanide management activities (e.g., implementing mitigation, sampling and monitoring, etc.) will need to be interviewed to ensure that they understand the prevention and mitigation measures in place to prevent escape of cyanide into the environment.</p>
Chapter 4.7—Mercury Management	Yes	Yes	Yes	Relevant mine site management and workers engaged in mercury management activities (e.g., implementing mitigation, sampling and monitoring, etc.) will need to be interviewed to ensure they understand the mercury management strategies and their roles in implementing the strategies.

APPENDIX 6—Remote auditing of IRMA critical requirements

This table is non-normative, and should be considered as a general reference only. It is possible that this table will be updated in future revisions to this policy, based on learnings from the first remote audits.

CRITICAL REQUIREMENTS	POTENTIAL TO AUDIT REMOTELY?
Principle 1 – Business Integrity	
1. The operating company complies with host country laws that are applicable to the mining project (1.1.1.1)	1.1.1.1. Yes
2. The mine fosters two-way dialogue and meaningful engagement with stakeholders (1.2.2.2).	1.2.2.2. Yes, but requires interviews with stakeholders to confirm.
3. The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights (1.3.1.1) and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships (1.3.2.1). The operating company is taking steps to remediate any known impacts on human rights caused by the mine (1.3.3.3).	1.3.1.1. Yes 1.3.2.1. Yes 1.3.3.3. Yes, but requires interviews with stakeholders to confirm.
4. Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation (1.4.1.1).	1.4.1.1. Yes
5. The operating company has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors (1.5.5.1).	1.5.5.1. Yes
Principle 2 – Planning and Managing for Positive Legacies	
6. The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project (2.1.3.1).	2.1.3.1. Yes
7. New mine sites have obtained the FPIC of indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected indigenous peoples and provides remedies for past impacts on indigenous peoples' rights and interests. (2.2.2.2 and scope of application)	2.2.2.2. Yes, but requires interviews with affected indigenous peoples to confirm.
8. If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met (2.4.7.1).	2.4.7.1. Maybe. If the mine is still monitoring and evaluating effectiveness of resettlement and livelihood plans then perhaps this can be verified remotely via review of reports, photos, etc.

	<p>However, if mine says livelihood restoration plans have been met, then an on-site component will be necessary to verify this unless a completion audit has been carried out by an external body.</p> <p>Interviews with affected rights holders will be necessary, regardless.</p>
9. All operations related to the mining project shall have an emergency response plan (2.5.1.1) and there is community participation in emergency response planning exercises (2.5.2.1).	2.5.1.1. Yes, but requires interviews with stakeholders to confirm participation.
10. Reclamation and closure plans are compatible with protection of human health and the environment, and are available to stakeholders (2.6.2.1 and 2.6.2.6).	<p>2.6.2.1. Yes</p> <p>2.6.2.6. Yes, but may require confirmation from stakeholders or remote verification (e.g., if not available on website, but rather, hard copy in library, etc.)</p>
11. Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring) (2.6.4.1).	2.6.4.1. Yes
Principle 3 – Social Responsibility	
12. Workers' freedom of association is respected (3.1.2.1).	3.1.2.1. Yes, but requires free and fair interviews with workers (i.e., assurance that worker opinions are not influenced in any way by site management)
13. Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers (3.1.3.3).	3.1.3.3. Yes, but requires confirmation through interviews with workers.
14. Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues (3.1.5.1).	3.1.5.1. Yes, but requires interviews with workers to confirm.
15. No children (i.e., persons under the age of 18) are employed to do hazardous work (3.1.7.2) and no children under the age of 15 are employed to do non-hazardous work (3.1.7.3).	<p>3.1.7.2. Yes, but requires interviews with workers to confirm.</p> <p>3.1.7.3. Yes, but requires interviews with workers to confirm</p>
16. There is no forced labor at the mine site or used by the operating company (3.1.8.1).	3.1.8.1. Yes, but requires interviews with workers to confirm.
17. Workers are informed of the hazards associated with their work, the health risks involved and relevant preventive and protective measures (3.2.4.1.a and b).	<p>3.2.4.1.a, b. Yes, but requires interviews with workers to confirm that they understand the hazards and the measures that need to be implemented to protect them.</p> <p>Verification to conform actual implementation will have to be done on-site.</p>

18. The risks to community health and safety posed by the mining operation are evaluated (3.3.1.1) and mitigated (3.3.3.1).	<p>3.3.1.1. Yes</p> <p>3.3.3.1. Maybe.</p> <p>Will require interviews with affected community members to confirm that mitigation is occurring.</p> <p>It may be possible/necessary to use remote techniques to view mitigation measures, depending on what they are. This may not be enough, however, to confidently verify that they are being effective.</p>
19. If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights (3.4.2.1).	3.4.2.1. Yes
20. The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel (3.5.1.2).	<p>3.5.1.2. Maybe.</p> <p>Ideally, observation of security personnel would occur to determine if they are acting in a manner that aligns with best practice. However, it may be possible to determine, through interviews with security personnel, whether or not they understand the policy/procedures, and determine through interviews with workers and affected community members whether or not security personnel are acting in a manner that aligns with the best practices in the mine's policy/procedures.</p> <p>Full verification will require on-site observation.</p>
Principle 4 - Environmental Responsibility	
21. A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities (4.1.4.1). Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices (4.1.5.1).	<p>4.1.4.1. Yes</p> <p>4.1.5.1. Maybe.</p> <p>It may be possible to use remote techniques to view mitigation measures. This may not be enough, however, to confidently verify that they are being effective.</p>
22. The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities (4.1.5.6).	<p>4.1.5.6. Maybe.</p> <p>It should be possible to review documentation of the company's evaluation of effectiveness of its mitigation/management measures.</p> <p>But on-site inspection will need to occur to verify that their evaluation, especially for critical controls,</p>

	actually matches what is happening in the field.
23. The mine does not use riverine, submarine or lake disposal for mine wastes (4.1.8.1)	4.1.8.1. Maybe. If questions are raised, may be able to use remote techniques to verify that no such dumping is taking place.
24. Water quality and quantity are being monitored at the mine site (4.2.4.1.a through e) and adverse impacts resulting from the mining operation are being mitigated (4.2.4.4)	4.1.4.1. Yes 4.2.4.4. Maybe. It may be possible to use remote techniques to view mitigation measures. This may not be enough, however, to confidently verify that they are being effective.
25. When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan (4.3.2.1).	4.3.2.1. Yes
26. There is a policy being implemented that includes targets for reducing greenhouse gas emissions (4.5.1.1).	4.5.1.1. Yes
27. The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas (4.6.2.1), and these impacts are being mitigated and minimized (4.6.4.1)	4.6.2.1. Yes 4.2.4.4. Maybe. It may be possible to use remote techniques to view mitigation measures. This may not be enough, however, to confidently verify that they are being effective.
28. New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves (4.6.5.2), and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized (4.6.5.4).	4.2.5.2. Yes. It should be possible to use remote techniques such as satellite images to verify that new mines are in any of these areas. 4.6.5.4. Maybe. It may be possible to use remote techniques to determine if existing mines in those areas are operating without damaging the special values of the area.
29. Gold or silver mines using cyanide are certified as complying with the Cyanide Code (4.7.1.1).	4.7.1.1. Yes
30. Mercury wastes are not permanently stored on site without adequate safeguards (4.8.2.3), are not sold or given to artisanal or small-scale miners, and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories (4.8.2.2).	4.8.2.3. Maybe. It may be possible to use remote techniques to view mercury waste storage sites. 4.8.2.2. Yes, but may require interviews with ASM miners or others to confirm that mercury not being sold or given to them.