A close up of a logo

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**MINE SITE ASSESSMENT  
PUBLIC SUMMARY REPORT**

mine site

XXXX

operating company

XXXX

country of operation

XXXX

XX MONTH YEAR

IRMA Standard for Responsible Mining, v.1.0

# Acknowledgements

IRMA believes that third-party, independent audits are most credible when there is robust participation not only from participating mines, but also from workers and stakeholders, particularly those from affected communities.

Outside stakeholders are not remunerated for their participation, and willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize XXXX mine and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

**DELETE THIS NOTE BEFORE FINALIZING REPORT:** **NOTE TO AUDITORS** – this template requires installation of the Montserrat font. It can be downloaded for free at: https://fonts.google.com/specimen/Montserrat

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# Audit Details

|  |  |
| --- | --- |
| Name of Mine: | XXXX |
| Operating Company: | XXXX |
| Mine Owner: | XXXX |
| Country of Operation: | XXXX |
| Mined Material(s): | XXXX |
| # Employees / contractors: | XXX at the time of audit |
| Mine site profile on IRMA’s  Responsible Mining Map: | <https://map.responsiblemining.net/site/62> |
| Audit Type: | XXXX (Initial, Surveillance or Recertification) |
| Audit Dates: | (Stage 2) |
| Audit Team: | List names and roles (e.g., lead auditor, environmental, social, health and safety, etc.) |
| Lead Auditor Declaration: | P The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers and stakeholders) as presented during the Stage 1 and Stage 2 audit activities.  P The audit team members were deemed to have no conflicts of interest with the mine.  P The audit team members were professional, ethical, objective and truthful in their conduct of audit activities.  P The information in this report is accurate according to the best knowledge of the auditors who contributed to the report. |
| Scope of Certification | XXXX |
| IRMA Standard Version: | IRMA Standard for Responsible Mining, v.1.0 (June 2018) |
| Certification Body (CB): | XXXX |
| CB Technical Reviewer: | XXXX |
| Certification Decision date: | XX Month XXXX |
| IRMA Reference Number: | Ask IRMA |

# 1. Mine Site Overview

## 1.1. Overview of location

XXXX

**NEW NOTE 2022:** IRMA will provide the GLOBAL locator map.

You should include a map showing the mine at the local level. You may also incude a site overview map (see, e.g., the Carrizal audit report: <https://responsiblemining.net/wp-content/uploads/2020/10/Carrizal-Audit-Report-Public-Summary-Oct2020.pdf>).

## 1.2. Overview of operation

XXXX

will

### 1.2.1. Scope of activities and facilities included in audit

XXXX

**NEW NOTE 2022:** This is a new subsection.

# 2. Mine Site Assessment Process

## 2.1. Overview of IRMA Process

The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).[[1]](#endnote-1) When the self-assessment has been completed, the independent, third-party assessment may begin.

Stage 1 of the independent, third-party assessment is a desk review carried by an IRMA-approved Certification Body, which puts together a team of auditors to review the self-assessment ratings and evidence provided by the mine site. During this stage of the audit additional information may be requested by auditors. Mines may also choose to take time to make improvements to practices prior to commencement of Stage 2.

Stage 2 is the on-site visit, which includes facility and site-based observations, additional review of materials and interviews with mine site personnel, workers, stakeholders and meetings with affected communities.

Based on observations, interviews and information evaluated during Stage 1 and Stage 2, auditors determine if mines are fully, substantially, partially or not meeting all of the IRMA Standard requirements relevant at the mine site. The decision regarding a mine site’s achievement level is made by the Certification Body.

IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA’s Certification Body Requirements, available on IRMA’s web site.[[2]](#endnote-2)

### 

### 2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by auditors who: have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts-of-interest with the mine site under assessment.[[3]](#endnote-3)

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).[[4]](#endnote-4) In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

Auditor evaluations are based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations.  Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

Audit evidence is based on samples of available information. Therefore, there is an element of uncertainty in auditing, and those acting upon the audit conclusions should be aware of this uncertainty.

### 2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website.[[5]](#endnote-5) Details on the complaints process can be found in IRMA’s Issues Resolution Procedure.[[6]](#endnote-6)

## 2.2. Audit Process and Timeline

* Company completed the initial self-assessment for mine in Month XXXX.
* CB carried out an initial Stage 1 desktop audit in Month XXXX.
* CB conducted a Stage 2 on-site audit in Month XXXX.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, documentation review and visit to operational areas including list facilities and other locations like communities.

## 2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and certification bodies, and prior to the on-site audit there is additional outreach carried out by certification bodies.

### 2.3.1. Written comments/inquiries

List how many comments received in writing, from NGO/Community/Other stakeholder sector.

**NEW NOTE 2022:** IF YOU DID DIRECT OUTREACH TO KEY STAKEHOLDERS: Give a sense of who you reached out to (NGOs, trade unions, community organizations, etc., without naming names) and the response rate – did you receive any comments from your outreach?

If you got feedback that certain stakeholders didn’t want to participate, and they gave you a reason, it would be good to report that here, too (without identifying the stakeholders).

### 2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

|  |  |
| --- | --- |
| Name (Optional) | Position/Role |
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### 2.3.3. Workers/Contractors

General summary here. Include in your narrative a summary of the range of types of jobs/tasks represented, without specifically naming any particular job (so as not to enable identification of particular participants).

In the table, list number of individual interviews, number of group interviews, and any breakdown by gender, if possible.

**NEW NOTE 2022:** Also, include any notable interviews – e.g., were there pregnant women, transgender, older/younger workers, did the samples include works covering a wide range of jobs/tasks, etc.

|  |  |
| --- | --- |
| Mine | EXAMPLE: 3 individuals (one female, one male, one male supervisor)  2 focus groups with 25 participants per group (Group 1 had 7 females, 18 males; Group 2 had 9 females, 16 males)  3 focus groups with 4 participants per group (Group 1 had x femals, x males; etc…) |
| Other facility (E.g., beneficiation plant, smelter) |  |
| Other facility (E.g., beneficiation plant, smelter) |  |

### 2.3.4. Government Agencies

General summary here. In table list position of government agent, if agreed by interviewee.

|  |
| --- |
| Government Institution |
|  |
|  |
|  |
|  |
|  |
|  |
|  |

### 2.3.5. Participating Communities and NGOs

General summary here of any nearby communities, any non-governmental organizations, community groups, etc., that were interviewed.

In table, list number of participants, and any breakdown by gender and ages, if possible.

|  |  |  |
| --- | --- | --- |
| Community, NGO Name | Location | Total Number of Attendees |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
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|  |  |  |

## 2.4. Summary of Mine Facilities Visited

The following areas were visited or observed during the on-site visit:

|  |  |
| --- | --- |
| Operational areas |  |
| Other areas visited (e.g., downstream watercourses, off-site facilities) |  |
| Surrounding Communities |  |

# 3. Summary of Findings

Detailed audit findings on a requirement-by-requirement basis can be found in Appendix 1.

## 3.1. Audit outcome

The site is recognized as having achieved the level of XXXXX based on the performance recorded as a result of the Stage 1 and Stage 2 audit activities.

## 3.2 Scores by IRMA Standard principle and chapter

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Chapter  Relevant\* | Actual  Score | Possible Score | Percent  Score |
| Principle 1: Business Integrity |  | XX | XX | XX% |
| Chapter 1.1—Legal Compliance | Yes or No | XX | XX | XX% |
| Chapter 1.2—Community and Stakeholder Engagement | Yes or No | XX | XX | XX% |
| Chapter 1.3—Human Rights Due Diligence | Yes or No | XX | XX | XX% |
| Chapter 1.4—Complaints Mechanism/Access to Remedy | Yes or No | XX | XX | XX% |
| Chapter 1.5—Revenue and Payments Transparency | Yes or No | XX | XX | XX% |
| Principle 2: Planning for Positive Legacies |  | XX | XX | XX% |
| Chapter 2.1—Env/Soc Impact Assessment and Managem’t | Yes or No | XX | XX | XX% |
| Chapter 2.2—Free, Prior and Informed Consent | Yes or No | XX | XX | XX% |
| Chapter 2.3—Community Support and Benefits | Yes or No | XX | XX | XX% |
| Chapter 2.4—Resettlement | Yes or No | XX | XX | XX% |
| Chapter 2.5—Emergency Preparedness and Response | Yes or No | XX | XX | XX% |
| Chapter 2.6—Planning/Financing Reclamation & Closure | Yes or No | XX | XX | XX% |
| Principle 3: Social Responsibility |  | XX | XX | XX% |
| Chapter 3.1—Fair Labor and Terms of Work | Yes or No | XX | XX | XX% |
| Chapter 3.2—Occupational Health and Safety | Yes or No | XX | XX | XX% |
| Chapter 3.3—Community Health and Safety | Yes or No | XX | XX | XX% |
| Chapter 3.4—Conflict-Affected and High-Risk Areas | Yes or No | XX | XX | XX% |
| Chapter 3.5—Security Arrangements | Yes or No | XX | XX | XX% |
| Chapter 3.6—Artisanal and Small-Scale Mining | Yes or No | XX | XX | XX% |
| Chapter 3.7—Cultural Heritage | Yes or No | XX | XX | XX% |
| Principle 4: Environmental Responsibility |  | XX | XX | XX% |
| Chapter 4.1—Waste and Materials Management | Yes or No | XX | XX | XX% |
| Chapter 4.2—Water Management | Yes or No | XX | XX | XX% |
| Chapter 4.3—Air Quality | Yes or No | XX | XX | XX% |
| Chapter 4.4—Noise and Vibration | Yes or No | XX | XX | XX% |
| Chapter 4.5—Greenhouse Gas Emissions | Yes or No | XX | XX | XX% |
| Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas | Yes or No | XX | XX | XX% |
| Chapter 4.7—Cyanide Management | Yes or No | XX | XX | XX% |
| Chapter 4.8—Mercury Management | Yes or No | XX | XX | XX% |

\* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials from ASM operations then Chapter 3.6 would be marked as not relevant.

Chapters deemed Not Relevant do not factor into the Principle Scores.

## 3.3. Performance on critical requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) mines must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

### 3.3.1. Snapshot of performance on 40 critical requirements

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| KEY— Description of performance |  |  |  |  |  | Fully meets |
|  |  |  |  |  | Substantially meets |
|  |  |  |  |  | Partially meets |
|  |  |  |  |  | Does not meet |
|  |  |  |  |  | Not relevant |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Social Responsibility | 3.1.2.1 |  |  |  |  |
| 3.1.3.3 |  |  |  |  |
| 3.1.5.1 |  |  |  |  |
| 3.1.7.2 |  |  |  |  |
| 3.1.7.3 |  |  |  |  |
| 3.1.8.1 |  |  |  |  |
| 3.2.4.1.a, b |  |  |  |  |
| 3.3.1.1 |  |  |  |  |
| 3.4.2.1 |  |  |  |  |
| 3.5.1.2 |  |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Environmental Responsibility | 4.1.4.1 |  |  |  |  |
| 4.1.5.1 |  |  |  |  |
| 4.1.5.6 |  |  |  |  |
| 4.1.8.1 |  |  |  |  |
| 4.2.4.1.a-e |  |  |  |  |
| 4.2.4.4 |  |  |  |  |
| 4.3.2.1 |  |  |  |  |
| 4.5.1.1 |  |  |  |  |
|  | 4.6.2.1 |  |  |  |  |
|  | 4.6.4.1 |  |  |  |  |
|  | 4.6.5.3 |  |  |  |  |
|  | 4.6.5.4 |  |  |  |  |
|  | 4.7.7.1 |  |  |  |  |
|  | 4.8.2.3 |  |  |  |  |
|  | 4.8.2.2 |  |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Business Integrity | 1.1.1.1 |  |  |  |  |
| 1.2.2.2. |  |  |  |  |
| 1.3.1.1. |  |  |  |  |
| 1.3.2.1. |  |  |  |  |
| 1.3.3.3. |  |  |  |  |
| 1.4.1.1. |  |  |  |  |
| 1.5.5.1. |  |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Planning for Positive Legacies | 2.1.3.1 |  |  |  |  |
| 2.2.2.2 |  |  |  |  |
| 2.4.7.1 |  |  |  |  |
| 2.5.1.1 |  |  |  |  |
| 2.5.2.1 |  |  |  |  |
| 2.6.2.1 |  |  |  |  |
| 2.6.2.6 |  |  |  |  |
| 2.6.4.1 |  |  |  |  |

### 3.3.2. Performance on 40 critical requirements.

|  |  |  |  |
| --- | --- | --- | --- |
| RATING LEGEND Description of performance |  | L | Fully meets |
|  | m | Substantially meets |
|  | l | Partially meets |
|  | E | Does not meet |
|  | **—** | Not relevant |

|  |  |  |
| --- | --- | --- |
| Principle 1: Business Integrity | | |
| 1.1.1.1 | The operating company shall comply with all applicable host country laws in relation to the mining project. | X |
| 1.2.2.2. | The mine fosters two-way dialogue and meaningful engagement with stakeholders | X |
| 1.3.1.1. | The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights. | X |
| 1.3.2.1. | and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships. | X |
| 1.3.3.3. | The operating company is taking steps to remediate any known impacts on human rights caused by the mine. | X |
| 1.4.1.1. | 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. | X |
| 1.5.5.1. | The operating company has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. | X |

|  |  |  |
| --- | --- | --- |
| Principle 2: Planning for Positive Legacies | | |
| 2.1.3.1 | The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project. | X |
| 2.2.2.2. | 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. | X |
| 2.4.7.1. | 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. | X |
| 2.5.1.1. | All operations related to the mining project shall have an emergency response plan | X |
| 2.5.2.1. | and there is community participation in emergency response planning exercises. | X |
| 2.6.2.1. | Reclamation and closure plans are compatible with protection of human health and the environment, | X |
| 2.6.2.6. | and are available to stakeholders. | X |
| 2.6.4.1. | Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring). | X |

|  |  |  |
| --- | --- | --- |
| m Principle 3: Social Responsibility | | |
| 3.1.2.1 | Workers’ freedom of association is respected. | X |
| 3.1.3.3. | Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers. | X |
| 3.1.5.1. | 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. | X |
| 3.1.7.2. | No children (i.e., persons under the age of 18) are employed to do hazardous work | X |
| 3.1.7.3. | and no children under the age of 15 are employed to do non-hazardous work. | X |
| 3.1.8.1. | There is no forced labor at the mine site or used by the operating company. | X |
| 3.2.4.1.a, b | Workers are informed of hazards associated with their work, the health risks involved and relevant preventive and protective measures. | X |
| 3.3.1.1. | The risks to community health and safety posed by the mining operation are evaluated and mitigated. | X |
| 3.4.2.1. | 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. | X |
| 3.5.1.2. | The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel. | X |

|  |  |  |
| --- | --- | --- |
| Principle 4: Environmental Responsibility | | |
| 4.1.4.1. | A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities. | X |
| 4.1.5.1. | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices. | X |
| 4.1.5.6. | 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. | X |
| 4.1.8.1. | The mine does not use riverine, submarine or lake disposal for mine wastes. | X |
| 4.2.4.1.a-e | Water quality and quantity are being monitored at the mine site | X |
| 4.2.4.4 | and adverse impacts resulting from the mining operation are being mitigated. | X |
| 4.3.2.1. | 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. | X |
| 4.5.1.1. | There is a policy being implemented that includes targets for reducing greenhouse gas emissions. | X |
| 4.6.2.1. | The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas | X |
| 4.6.4.1. | and these impacts are being mitigated and minimized. | X |
| 4.6.5.3. | 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 | X |
| 4.6.5.4. | 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. | X |
| 4.7.1.1. | Gold or silver mines using cyanide are certified as complying with the Cyanide Code. | X |
| 4.8.2.3. | Mercury wastes are not permanently stored on site without adequate safeguards, |  |
| 4.8.2.2. | 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. Next Steps

## 4.1 Corrective Action Plans

Summary of whether or not CAP required, and if it is in place for required elements.

## 4.2 Disclosure of Summary Audit Report

IRMA requires that all mines that undergo independent, third-party auditing disclose a summary audit report within 12 months of an audit to maintain good standing in the IRMA system.

Summary of what the mine plans to do.

XXXS Mine’s public audit report will be posted on the IRMA web site, and also on the XXX Mine’s profile on the Responsible Mining Map.[[7]](#endnote-7)

## 4.3 Timing of Future Audits

In the IRMA system, mines are allowed a 12-month corrective action period if they are interested in addressing non-conformities with critical or other requirements to reach a higher achievement level or gain recognition for improved performance. This enables them to implement changes and have them verified by auditors without waiting until the surveillance or recertification audit.

Summary of what the mine plans to do.

# APPENDIX–Results by Requirement

## Principle 1: Business Integrity

|  |  |  |  |
| --- | --- | --- | --- |
| RATING LEGEND Description of performance |  | L | Fully meets |
|  | m | Substantially meets |
|  | l | Partially meets |
|  | E | Does not meet |
|  | **—** | Not relevant |

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| Chapter 1.1—Legal Compliance | |  | Basis for rating |
| 1.1.1.1. | Critical The operating company shall comply with all applicable host country laws in relation to the mining project. | X |  |
| 1.1.2.1. | The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law. | X |  |
| 1.1.3.1. | If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring. | X |  |
| 1.1.4.1. | The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project. | X |  |
| 1.1.5.1. | The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard. | X |  |
| 1.1.5.2. | Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies. | X |  |
| 1.1.5.3. | Upon request, operating companies shall provide stakeholders with a summary of the mining project’s regulatory non-compliance issues that are publicly available. | X |  |
| 1.1.5.4. | Where the operating company claims that records or documentation contains confidential business information, it shall:   1. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and 2. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information. | X |  |

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| Chapter 1.2—Community and  Stakeholder Engagement | |  | Basis for rating |
| 1.2.1.1. | The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities. | X |  |
| 1.2.1.2. | A stakeholder engagement plan scaled to the mining project’s risks and impacts and stage of development shall be developed, implemented and updated as necessary. | X |  |
| 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). | X |  |
| 1.2.1.4. | The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes. | X |  |
| 1.2.2.1. | Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning) | X |  |
| 1.2.2.2. | Critical The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:   1. Providing relevant information to stakeholders in a timely manner; 2. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; 3. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; 4. Soliciting feedback from stakeholders on issues relevant to them; and 5. Providing stakeholders with feedback on how the company has taken their input into account. | X |  |
| 1.2.2.3. | The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project’s environmental and social performance, and/or input to the company on issues of concern to stakeholders. | X |  |
| 1.2.2.4. | Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives. | X |  |
| 1.2.2.5. | When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community. | X |  |
| 1.2.2.6. | The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders. | X |  |
| 1.2.2.7. | The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes. | X |  |
| 1.2.3.1. | The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement. | X |  |
| 1.2.4.1. | Any information that relates to the mine’s performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information. | X |  |
| 1.2.4.2. | If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested. | X |  |
| 1.2.4.3. | Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders | X |  |
| 1.2.4.4. | If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information. | X |  |

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| Chapter 1.3—Human Rights Due Diligence | |  | Basis for rating |
| 1.3.1.1. | Critical The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights | X |  |
| 1.3.1.2. | The policy shall:   1. Be approved at the most senior level of the company; 2. Be informed by relevant internal and/or external expertise; 3. Stipulate the operating company’s human rights expectations of personnel, business partners and other parties directly linked to its mining project; 4. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; 5. Be reflected in the mining project’s operational policies and procedures. | X |  |
| 1.3.2.1. | Critical The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment. | X |  |
| 1.3.2.2. | Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:   1. Follow a credible process/methodology; 2. Be carried out by competent professionals; and 3. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. | X |  |
| 1.3.2.3. | As part of its assessment, the operating company shall document, at minimum:   1. The assessment methodology; 2. The current human rights context in the country and mining project area; 3. Relevant human rights laws and norms; 4. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk; 5. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group; 6. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. | X |  |
| 1.3.2.4. | At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them, and shall be consulted to provide feedback on those findings. | X |  |
| 1.3.2.5. | The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level. | X |  |
| 1.3.3.1. | Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights. | X |  |
| 1.3.3.2. | Responding to human rights risks related to the mining project:   1. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s). 2. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks. 3. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. | X |  |
| 1.3.3.3. | Critical Responding to actual human rights impacts related to the mining project:   1. If the operating company determines that it has caused an actual human rights impact, the company shall: 2. Cease or change the activity responsible for the impact; and 3. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders; 4. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; 5. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and 6. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships. | X |  |
| 1.3.4.1. | The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders. | X |  |
| 1.3.4.2. | External monitoring of an operating company’s human rights due diligence shall occur if the company’s due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:   1. The company shall fund the external monitoring; and 2. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. | X |  |
| 1.3.5.1. | The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts. | X |  |
| 1.3.5.2. | If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company’s human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations. | X |  |
| 1.3.5.3. | Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization. | X |  |

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| Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy | |  | Basis for rating |
| 1.4.1.1. | Critical The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities. | X |  |
| 1.4.2.1. | The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:   1. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue; 2. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; 3. How confidentiality of a complainant’s identity will be respected, if requested; 4. The ability to file anonymous complaints, if deemed necessary by stakeholders; 5. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups; 6. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and 7. How complaints and grievances and their resolutions will be tracked and recorded. | X |  |
| 1.4.2.2. | The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available. | X |  |
| 1.4.3.1. | No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies. | X |  |
| 1.4.4.1. | Complaints and grievances and their outcomes and remedies shall be documented. | X |  |
| 1.4.4.2. | The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine:   1. If changes need to be made to improve its effectiveness as per 1.4.2.1.a; 2. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and 3. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights. | X |  |
| 1.4.4.3. | Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism. | X |  |
| 1.4.5.1. | The operating company shall take reasonable steps to inform all stakeholders of the existence of the operational-level complaints and grievance mechanism, its scope, and its procedures. | X |  |
| 1.4.5.2. | The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies. | X |  |
| 1.4.5.3. | The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous. | X |  |
| 1.4.6.1. | Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances. | X |  |

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| Chapter 1.5—Revenue and Payments Transparency | |  | Basis for rating |
| 1.5.1.1. | The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime. | X |  |
| 1.5.1.2. | On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year. | X |  |
| 1.5.1.3. | The types of payment disclosed shall include as a minimum, as applicable:   1. The host government’s production entitlement; 2. National state-owned enterprise production entitlement; 3. Profits taxes; 4. Royalties; 5. Dividends; 6. Bonuses, such as signature, discovery and production bonuses; 7. License fees, rental fees, entry fees and other considerations for licenses and/or concessions; 8. Payments for infrastructure improvements; and 9. Any other significant payments and material benefits to government, including in kind payments. | X |  |
| 1.5.1.4. | At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type. | X |  |
| 1.5.2.1. | The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below. | X |  |
| 1.5.2.2. | The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:   1. Mine production, disaggregated by product type and volume; 2. Revenues from sales, disaggregated by product type; 3. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department); 4. Social expenditures, including the names and functions of beneficiaries; 5. Taxes, tariffs or other relevant payments related to transportation of minerals; 6. Payments to politicians’ campaigns, political parties or related organizations; and 7. Fines or other similar penalties that have been issued in relation to the project. | X |  |
| 1.5.2.3. | The operating company shall publish annual accounts, following international accounting standards. | X |  |
| 1.5.3.1. | If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website. | X |  |
| 1.5.3.2. | If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall:   1. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and 2. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation. | X |  |
| 1.5.4.1. | The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located.   1. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible. 2. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement. | X |  |
| 1.5.4.2. | The beneficial ownership of the operating company shall be publicly accessible. | X |  |
| 1.5.5.1. | Critical The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. | X | An anti-bribery/anti-corruption policy was reported to be in place; this policy is verbally communicated to employees and contractors but is not provided in writing. |
| 1.5.5.2. | Procedures shall include:   1. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and 2. Disciplinary actions to be taken if cases of bribery or corruption are discovered. | X |  |
| 1.5.5.3. | Relevant employees and contractors shall be trained in the application of the operating company’s policy and procedures. | X | Training on the policy was reported to be included in employee induction training. Written procedures are not in place and therefore have not been communicated in training. |

## Principle 2: Planning for Positive Legacies

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| RATING LEGEND Description of performance |  | L | Fully meets |
|  | m | Substantially meets |
|  | l | Partially meets |
|  | E | Does not meet |
|  | **—** | Not relevant |

**Note on Chapter 2.1:**

In October 2020, the IRMA Board approved changes in the way Chapter 2.1 was to be audited for existing mines. [[8]](#footnote-1) The table below includes now shows where expectations are different for new versus existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. If they have opted to do so, that will be reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

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| Chapter 2.1—Environmental and Social Impact Assessment and Management | |  | Basis for rating |
| 2.1.1.1 | An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.1.2. | To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.1.3. | The ESIA shall be carried out in accordance with publicly available, documented procedures. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.2.1. | Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.2.2. | Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company’s external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:   1. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities; 2. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts; 3. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and 4. Contact details for the person or team responsible for management of the ESIA. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.3.1. | Critical (New Mines) The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.  Critical (Existing Mines) The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation. | X |  |
| 2.1.3.2. | During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as “stakeholders”) who may be interested in and/or affected by the proposed project. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.3.3. | Scoping shall include the consideration of:   1. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure; 2. Direct, indirect and cumulative impacts; and 3. Potential impacts of extreme events. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.3.4 | Scoping shall result in the identification of:   1. Potentially significant environmental and social impacts of the proposed project; 2. Alternative project designs to avoid significant adverse impacts; 3. Other actions to mitigate identified adverse impacts; and 4. Additional information and data needed to understand and assess the potential impacts. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.4.1. | Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.4.2. | Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.5.1 | The operating company shall:   1. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping; 2. Determine the significance of the predicted impacts; 3. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and 4. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.6.1. | The operating company shall prepare an ESIA report that includes, at minimum:   1. A description of the proposed mining project; 2. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts; 3. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts; 4. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and 5. Names and affiliations of ESIA authors and others involved in technical studies. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.7.1. | The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine. | X |  |
| 2.1.7.2 | An environmental and social management plan (or its equivalent) shall be developed that, at minimum:   1. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process; 2. Assigns personnel responsible for implementation of various elements of the plan; and 3. Includes estimates for the resources needed to implement the plan. | X |  |
| 2.1.7.3. | The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information. | X |  |
| 2.1.8.1. | As part of the ESMS, the operating company shall establish a program to monitor:   1. The significant environmental and social impacts identified during or after the ESIA process; and 2. The effectiveness of mitigation measures implemented to address environmental and social impacts. | X |  |
| 2.1.8.2. | The monitoring program shall be designed and carried out by competent professionals. | X |  |
| 2.1.8.3. | If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project. | X |  |
| 2.1.9.1. | (New Mines) As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:   1. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3); 2. Methodologies for the collection of environmental and social baseline data (see 2.1.4); 3. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b); 4. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c); 5. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and 6. The final conclusions and recommendations of the ESIA (see 2.1.6.1).   (Existing Mines) The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine | X |  |
| 2.1.9.2. | (New Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process.  (Existing Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options to mitigate the potential impacts of the mine. | X |  |
| 2.1.9.3. | The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program. | X |  |
| 2.1.9.4. | The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program. | X |  |
| 2.1.9.5. | The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments. | X |  |
| 2.1.10.1. | (New Mines) The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner.  (Existing Mines) At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public | X |  |
| 2.1.10.2. | The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account. | X | SUGGESTED LANGUAGE (if mine decides to be audited against CORE ESIA requirements)  Not relevant because this is an existing mine that is being scored against IRMA’s core ESIA requirements. See Note on Chapter 2.1. |
| 2.1.10.3. | The environmental and social management plan shall be made available to stakeholders upon request. | X |  |
| 2.1.10.4. | Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available. | X |  |
| 2.1.10.5. | (New Mines) The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.  (Existing Mines) The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means. | X |  |

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| Chapter 2.2—Free, Prior and Informed Consent (FPIC) |  | Basis for rating |
| Chapter Not Relevant | **—** |  |

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| Chapter 2.2—Free, Prior and Informed Consent (FPIC) | |  | Basis for rating |
| 2.2.1.1. | The operating company shall have a publicly available policy that includes a statement of the company’s respect for indigenous peoples’ rights, as set out in the United Nations Declaration on the Rights of Indigenous Peoples. | X |  |
| 2.2.1.2. | The operating company shall ensure that indigenous peoples potentially affected by the company’s mining-related activities are aware of the policy. | X |  |
| 2.2.2.1. | The operating company shall conduct due diligence to determine if the host government conducted an adequate consultation process aimed at obtaining indigenous peoples’ informed consent prior to granting access to mineral resources. The key findings of due diligence assessments shall be made publicly available and shall include the company’s justification for proceeding with a project if the State failed to fulfill its consultation and/or consent duties. | X |  |
| 2.2.2.2. | Critical New mines shall not be certified by IRMA unless they have obtained the free, prior and informed consent (FPIC) of potentially affected indigenous peoples. The circumstances for obtaining FPIC include situations where mining-related activities may affect indigenous peoples’ rights or interests, including those that may: impact on lands, territories and resources; require the physical relocation of people; cause disruption to traditional livelihoods; impact on critical cultural heritage; or involve the use of cultural heritage for commercial purposes. | X |  |
| 2.2.2.3. | For new and existing mines, the operating company shall obtain FPIC from indigenous peoples for proposed changes to mining-related activities that may result in new or increased impacts on indigenous peoples’ rights or interests. | X |  |
| 2.2.2.4. | If indigenous peoples’ representatives clearly communicate, at any point during engagement with the operating company, that they do not wish to proceed with FPIC-related discussions, the company shall recognize that it does not have consent, and shall cease to pursue any proposed activities affecting the rights or interests of the indigenous peoples. The company may approach indigenous peoples to renew discussions only if agreed to by the indigenous peoples’ representatives. | X |  |
| 2.2.3.1. | The operating company shall:   1. Consult with indigenous peoples and others, and review other relevant date to identify indigenous peoples that own, occupy or otherwise use land, territories or resources that may be affected by the mining project; 2. Disclose to indigenous peoples, in a culturally appropriate manner, the preliminary project concepts and/or proposed activities, and the indigenous peoples’ right to FPIC. | X |  |
| 2.2.3.2. | The operating company shall collaborate with indigenous peoples’ representatives and other relevant members of affected communities of indigenous peoples to:   1. Identify the appropriate means of engagement for each group of indigenous peoples (e.g., tribe, nation, population); 2. Identify indigenous peoples’ rights and interests that may be affected by the proposed activities; 3. Identify additional studies or assessments needed to determine the range and degree of potential impacts on indigenous peoples’ rights or interests; and 4. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and 5. Ensure that the community as a whole/collective has meaningful opportunities to be involved in these processes. | X |  |
| 2.2.3.3. | The operating company shall collaborate with the indigenous peoples’ representatives to design and implement plans to address the information gaps and needs identified through the scoping process. | X |  |
| 2.2.4.1. | If there is more than one distinct indigenous peoples’ group (e.g., tribe, nation, population) that may be affected by the operating company’s mining-related activities, they may be included in a coordinated process or separate FPIC processes, as desired by the indigenous peoples. | X |  |
| 2.2.4.2. | If the potentially affected indigenous peoples have an FPIC protocol in place or under development, the operating company shall abide by it unless changes are agreed to by the indigenous peoples’ group(s). Otherwise, the operating company shall jointly develop and document, in a manner agreed to by indigenous peoples’ representatives, the FPIC process or processes to be followed. | X |  |
| 2.2.4.3. | The operating company shall make information on the mutually-agreed FPIC processes publicly available, unless the indigenous peoples’ representatives have explicitly requested otherwise. | X |  |
| 2.2.5.1. | The operating company shall document, in a manner agreed to by the indigenous peoples, the FPIC process that was followed. | X |  |
| 2.2.5.2. | The operating company shall publicly report, in a manner agreed to by the indigenous peoples, on the FPIC process that was followed and its outcome. | X |  |
| 2.2.5.3. | If the process results in consent being given by indigenous peoples to certain mining-related activities, an agreement outlining the terms and conditions shall be signed or otherwise validated by the operating company and the representative(s) of the indigenous peoples. The agreement shall be binding and shall be made publicly available unless the indigenous peoples’ representatives explicitly request otherwise. | X |  |
| 2.2.6.1 | For new mines, IRMA certification is not possible if a mining project does not obtain free, prior and informed consent from indigenous peoples. | X |  |
| 2.2.7.1. | The operating company shall collaborate with indigenous peoples to monitor implementation of the FPIC agreement, and document the status of the commitments made in the agreement. | X |  |
| 2.2.7.2. | Engagement with indigenous peoples shall continue throughout all stages of the mining project. | X |  |

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| Chapter 2.3—Obtaining Community Support and Delivering Benefits |  | Basis for rating |
| Chapter Not Relevant | **—** |  |

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| Chapter 2.3—Obtaining Community Support and Delivering Benefits | |  | Basis for rating |
| 2.3.1.1. | The operating company shall publicly commit to:   1. Maintaining or improving the health, social and economic wellbeing of affected communities; and 2. Developing a mining project only if it gains and maintains broad community support. | X |  |
| 2.3.2.1. | For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained. | X |  |
| 2.3.2.2. | For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:   1. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project; 2. Was transparent; 3. Was free from coercion or manipulation; and 4. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution. | X |  |
| 2.3.2.3. | For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support. | X |  |
| 2.3.3.1. | The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company’s contributions to community development initiatives and benefits in affected communities. | X |  |
| 2.3.3.2. | The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency. | X |  |
| 2.3.3.3. | If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process. | X |  |
| 2.3.3.4. | Efforts shall be made to develop:   1. Local procurement opportunities; 2. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and 3. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). | X |  |
| 2.3.3.5. | The planning process and any outcomes or decisions shall be documented and made publicly available. | X |  |
| 2.3.3.6. | In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements. | X |  |

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| Chapter 2.4—Resettlement |  | Basis for rating |
| Chapter Not Relevant | **—** | SUGGESTED LANGUAGE  Not relevant because no resettlement has occurred in association with this mine.  OR CHOOSE THIS LANGUAGE  Not relevant because resettlement associated with this mine occurred prior to 2006,[[9]](#footnote-2) and there have not been any proposed or actual changes to the operation since 2006 that may require or have required resettlement. |

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| Chapter 2.4—Resettlement | |  | Basis for rating |
| 2.4.1.1. | If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people. | X | XXX |
| 2.4.1.2. | The assessment shall:   1. Be undertaken during the early stages of mining project planning; 2. Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people; 3. Identify and analyze the social, cultural, human rights, conflict, environmental and economic risks and impacts to displaced persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and 4. Identify measures to prevent and mitigate risks and impacts, and estimate the costs of implementing the measures. | X | XXX |
| 2.4.1.3. | The assessment shall be undertaken by competent professionals with experience in resettlement related to large-scale development projects. | X | XXX |
| 2.4.1.4. | The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement. | X | XXX |
| 2.4.1.5. | The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors. | X | XXX |
| 2.4.2.1. | The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during:   1. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement; 2. The development of resettlement and livelihood options; and 3. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP). | X |  |
| 2.4.2.2. | The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment, through monitoring and evaluation of the resettlement process. | X |  |
| 2.4.2.3. | People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement. | X |  |
| 2.4.3.1. | When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance. | X | XXX |
| 2.4.3.2. | In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility. Information regarding the cut-off date shall be well documented, and disseminated along with eligibility information throughout the mining project area. | X | XXX |
| 2.4.3.3. | In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:   1. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases; 2. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of women, the poor and vulnerable groups; 3. Describe development-related opportunities and benefits for affected people and communities; 4. Describe the methods used for valuing land and other assets; 5. Establish the compensation framework (i.e., entitlements and rates of compensation for all categories of affected people, including host communities) in a transparent, consistent, and equitable manner; 6. Include a budget and implementation schedule; and 7. Be publicly available. | X |  |
| 2.4.4.1. | In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities:   1. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for them to improve or at least restore their standard of living at an alternative site; 2. New resettlement sites built for displaced people shall offer improved living conditions; and 3. Displaced people’s preferences with respect to relocating in pre-existing communities and groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected. | X | XXX |
| 2.4.4.2. | In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law:   1. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of tenure, and advantages of location; and   If cash compensation is appropriate and preferred by the affected people, compensation shall be sufficient to replace lost land and other assets at full replacement cost in local markets | X | XXX |
| 2.4.4.3. | In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall:   1. Offer options for adequate housing with security of tenure; and   Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility. | X | XXX |
| 2.4.5.1. | If project-related land acquisition or restrictions on land use result in economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures:   1. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income;   When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and  Economically displaced people who are without legally recognizable claims to land shall be compensated for lost assets other than land at full replacement cost. | X | XXX |
| 2.4.5.2. | All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally:   1. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority;   For people whose livelihoods are natural resource-based and where project-related restrictions on access apply, continued access to affected resources or access to alternative resources with at least equivalent livelihood-earning potential and accessibility shall be provided; and  If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods | X | XXX |
| 2.4.6.1. | In order to be certified by IRMA, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2). | X | XXX |
| 2.4.6.2. | If a new mine will require the displacement of non-indigenous peoples, the operating company shall make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before proceeding with the resettlement, even if the company has the legal means to acquire land or restrict land use without their consent. | X | XXX |
| 2.4.6.3. | Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum:   1. Copies of RAP and/or LRP;   Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and  Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information. | X | XXX |
| 2.4.6.4. | In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people. | X | XXX |
| 2.4.6.5. | Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter. | X | XXX |
| 2.4.6.6. | The operating company shall take possession of acquired land and related assets only after compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people. | X | XXX |
| 2.4.6.7. | The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities. | X |  |
| 2.4.7.1. | Critical The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met. | X |  |
| 2.4.7.2. | Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP. | X |  |
| 2.4.7.3. | Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company:   1. Shall retain competent professionals to verify the operating company’s monitoring information and provide advice on additional steps needed to achieve compliance with the requirements of this chapter; and   Shall commission a completion audit that:   1. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented; 2. Is carried out by external resettlement experts; 3. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and 4. Is made available to affected people and their advisors. | X |  |
| 2.4.8.1. | Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter. | X |  |
| 2.4.8.2. | The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum:   1. Identification of affected people and impacts;   A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations;  The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and  The financial and implementation responsibilities of the operating company in the execution of its supplemental plan. | X |  |

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| Chapter 2.5—Emergency Preparedness and Response | |  | Basis for rating |
| 2.5.1.1. | Critical All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | X |  |
| 2.5.1.2. | The operating company shall:   1. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and 2. Update the communications contacts of the emergency response plan at least annually. | X |  |
| 2.5.2.1. | Critical The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers’ representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises. | X |  |
| 2.5.3.1. | All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events. | X |  |
| 2.5.3.2. | The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others. | X |  |
| 2.5.3.3. | The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property. | X |  |

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| Chapter 2.6—Planning and Financing Reclamation and Closure | |  | Basis for rating |
| 2.6.1.1. | The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company. | X |  |
| 2.6.1.2. | The operating company shall implement exploration-related reclamation in a timely manner. | X |  |
| 2.6.1.3. | Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4). | X |  |
| 2.6.2.1 | Critical Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use. | X |  |
| 2.6.2.2 | At a minimum, the reclamation and closure plan shall contain:   1. A general statement of purpose; 2. Site location and background Information; 3. A description of the entire facility, including individual site features; 4. The role of the community in reviewing the reclamation and closure plan; 5. Agreed-upon (after-ESIA) post-mining land use and facility use; 6. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure; 7. Source mitigation program to prevent the degradation of water resources; 8. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization; 9. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable; 10. Earthwork: 11. Stabilization and final topography of the reclaimed mine lands; 12. ii. Storm water runoff/run-on management; 13. Topsoil salvage to the maximum extent practicable; 14. Topsoil storage in a manner that preserves its capability to support plant regeneration; 15. Revegetation/Ecological Restoration: 16. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use; 17. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time; 18. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed; 19. Measures for control of noxious weeds; 20. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); 21. Hazardous materials disposal; 22. Facility demolition and disposal, if not used for other purposes; 23. Long-term maintenance; 24. Post-closure monitoring plan; 25. The role of the community in long-term monitoring and maintenance (if any); and 26. A schedule for all activities indicated in the plan. | X |  |
| 2.6.2.3. | The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:   1. Mobilization/demobilization; 2. Engineering redesign, procurement, and construction management; 3. Earthwork; 4. Revegetation/Ecological Restoration; 5. Disposal of hazardous materials; 6. Facility demolition and disposal; 7. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including: 8. Interim process water and site management; and 9. Short-term water treatment; 10. Post-closure costs for: 11. Long-term water treatment; and 12. Long-term monitoring and maintenance; 13. Indirect Costs: 14. Mobilization/demobilization; 15. Engineering redesign, procurement and construction management; 16. Contractor overhead and profit; 17. Agency administration; 18. Contingency; and 19. Either: 20. A multi-year inflation increase in the financial surety; or 21. An annual review and update of the financial surety. | X |  |
| 2.6.2.4. | The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report. | X |  |
| 2.6.2.5. | If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:   1. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and 2. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety. | X |  |
| 2.6.2.6. | Critical The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request. | X |  |
| 2.6.3.1. | Open pits shall be partially or completely backfilled if:   1. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and 2. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and 3. It is economically viable. | X |  |
| 2.6.3.2. | Underground mines shall be backfilled if:   1. Subsidence is predicted on lands not owned by the mining company; and 2. If the mining method allows. | X |  |
| 2.6.4.1. | Critical Financial surety instruments shall be in place for mine closure and post-closure. | X |  |
| 2.6.4.2. | Financial surety instruments shall be:   1. Independently guaranteed, reliable, and readily liquid; 2. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; 3. In place before ground disturbance begins; and 4. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. | X |  |
| 2.6.4.3. | Self-bonding or corporate guarantees shall not be used. | X |  |
| 2.6.4.4. | The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request. | X |  |
| 2.6.4.5. | Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:   1. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety. 2. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and 3. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to review the financial surety. | X |  |
| 2.6.4.6. | The terms of the financial surety shall guarantee that the surety is not released until:   1. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and 2. Public comment has been taken before partial or final surety release. | X |  |
| 2.6.5.1. | Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities, including, but not limited to:   1. Inspection of surface (open pits) and underground mine workings; 2. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and 3. Mechanisms for contingency and response planning and implementation. | X |  |
| 2.6.5.2. | Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance. | X |  |
| 2.6.5.3. | Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively. | X |  |
| 2.6.5.4. | Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources. | X |  |
| 2.6.5.5. | If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms. | X |  |
| 2.6.6.1. | Long-term water treatment shall not take place unless:   1. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and 2. The operating company funds an engineering and risk assessment that: 3. Is carried out by an independent third-party: 4. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods; 5. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms; 6. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and 7. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion. | X |  |
| 2.6.6.2 | If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated. | X |  |
| 2.6.7.1. | The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company’s finances at the time of mine closure or bankruptcy. | X |  |
| 2.6.7.2. | If long-term water treatment is required post-closure:   1. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and 2. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded. | X |  |
| 2.6.7.3. | The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety. | X |  |
| 2.6.7.4. | Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:   1. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and 2. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US $10.00 or less (or its equivalent in other currencies). | X |  |

## Principle 3: Social Responsibility–appendix

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| RATING LEGEND Description of performance |  | L | Fully meets |
|  | m | Substantially meets |
|  | l | Partially meets |
|  | E | Does not meet |
|  | **—** | Not relevant |

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| Chapter 3.1—Fair Labor and Terms of Work | |  | Basis for rating |
| 3.1.1.1. | The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law. | X |  |
| 3.1.2.1. | Critical The operating company shall respect the rights of workers to freedom of association and collective bargaining. | X |  |
| 3.1.2.2. | Where national law substantially restricts workers’ organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms. | X |  |
| 3.1.2.3. | The operating company shall engage with workers’ representatives and workers’ organizations and provide them with information needed for meaningful negotiation in a timely manner. | X |  |
| 3.1.2.4. | Workers’ representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers’ representatives at fly-in/fly-out or other remotely located mine sites, where relevant. | X |  |
| 3.1.2.5. | The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers’ organizations participating in a legal strike. | X |  |
| 3.1.2.6. | Upon employment, the operating company shall:   1. Inform workers of their rights under national labor and employment law; 2. Inform workers that they are free to join a workers’ organization of their choosing without any negative consequences or retaliation from the operating company; 3. If relevant, inform workers of their rights under any applicable collective agreement; and 4. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. | X |  |
| 3.1.2.7. | The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers’ organizations or in a legal strike. | X |  |
| 3.1.2.8. | Where the operating company is a party to a collective bargaining agreement with a workers’ organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements. | X |  |
| 3.1.2.9. | The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations. | X |  |
| 3.1.2.10. | The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike. | X |  |
| 3.1.3.1. | The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements. | X |  |
| 3.1.3.2 | Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:   1. Targets or quotas mandated by law; 2. Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or 3. Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets. | X |  |
| 3.1.3.3. | Critical The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers. | X |  |
| 3.1.4.1. | Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers. | X |  |
| 3.1.4.2. | The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments. | X |  |
| 3.1.5.1. | Critical The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:   1. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution; 2. Shall allow for anonymous complaints to be raised and addressed; 3. Shall allow workers’ representatives to be present, if requested by the aggrieved worker; and 4. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. | X |  |
| 3.1.5.2. | The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. | X |  |
| 3.1.5.3. | The operating company shall maintain a record of grievances and the company’s actions taken to respond to and/or resolve the issues. | X |  |
| 3.1.6.1. | The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers. | X |  |
| 3.1.6.2. | The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation of workers during disciplinary actions. | X |  |
| 3.1.6.3. | The operating company shall keep records of all disciplinary actions taken. | X |  |
| 3.1.7.1. | The operating company shall document the ages of all workers. | X |  |
| 3.1.7.2. | Critical Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances). | X |  |
| 3.1.7.3. | Critical The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher. | X |  |
| 3.1.7.4. | When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child’s health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself. | X |  |
| 3.1.7.5. | If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:   1. The child shall be removed immediately from his or her job; and 2. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child’s family. | X |  |
| 3.1.7.6. | Where there is a high risk of child labor in the mine’s supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project’s supply chain over time to suppliers that can demonstrate that they are complying with this chapter. | X |  |
| 3.1.8.1. | Critical The operating company shall not employ forced labor or participate in the trafficking of persons. | X |  |
| 3.1.8.2. | Where there is a high risk of forced or trafficked labor in the mine’s supply chain, the operating company shall develop and implement procedures to monitor it suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project’s supply chain over time to suppliers that can demonstrate that they are complying with this chapter. | X |  |
| 3.1.9.1. | The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage. | X |  |
| 3.1.9.2. | Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage. | X |  |
| 3.1.9.3. | All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid. | X |  |
| 3.1.9.4. | The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check). | X |  |
| 3.1.9.5. | The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist:   1. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or 2. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award. | X |  |
| 3.1.10.1. | The operating company shall ensure that:   1. Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week; 2. Workers are provided with at least 24 consecutive hours off in every 7-day period; and 3. Overtime is consensual, and limited to 12 hours a week. 4. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if: 5. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and 6. Through consultations with workers’ representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety and welfare of workers. | X |  |
| 3.1.10.2. | Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:   1. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and 2. A maternity leave period of no less than 14 weeks. | X |  |

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| Chapter 3.2—Occupational Health and Safety | |  | Basis for rating |
| 3.2.1.1. | The operating company shall implement a health and safety management system for measuring and improving the mining project’s health and safety performance. | X |  |
| 3.2.2.1. | The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations. | X |  |
| 3.2.2.2. | The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:   1. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management; 2. All personnel, contractors, business partners, suppliers and visitors; 3. Unwanted events; 4. Routine and non-routine activities, products, procedures, and services; and 5. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. | X |  |
| 3.2.2.3. | The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards. | X |  |
| 3.2.2.4. | The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards. | X |  |
| 3.2.2.5. | In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:   1. 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; 2. 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; 3. Maintain the stability of the ground in areas to which persons have access in the context of their work; 4. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface; 5. If relevant, ensure adequate ventilation for all underground workings to which access is permitted; 6. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards; 7. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and 8. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. | X |  |
| 3.2.3.1. | Workers shall be informed of their rights to:   1. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority; 2. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority; 3. Know and be informed of workplace hazards that may affect their safety or health; 4. Obtain information relevant to their safety or health, held by the employer or the competent authority; 5. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and 6. Collectively select safety and health representatives. | X |  |
| 3.2.3.2. | In all cases a worker attempting to exercise any of the rights referred to in 3.2.3.1 in good faith shall be protected from reprisals of any sort. | X |  |
| 3.2.3.3. | The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety. | X |  |
| 3.2.3.4. | The operating company shall develop and implement a formal process involving workers’ representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:   1. Health and safety hazard identification and assessment; 2. Design and implementation of workplace monitoring and worker health surveillance programs; 3. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers’ health surveillance; and 4. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | X |  |
| 3.2.3.5. | The operating company shall provide workers’ health and safety representatives with the opportunity to:   1. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace; 2. Monitor and investigate safety and health matters; 3. Have recourse to advisers and independent experts; and 4. Receive timely notice of accidents and dangerous occurrences. | X |  |
| 3.2.3.6. | Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering. | X |  |
| 3.2.4.1. | Critical (a and b) The operating company shall implement measures to protect the safety and health of workers including:   1. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; 2. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; 3. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; 4. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; 5. Providing adequate supervision and control on each shift; and 6. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. | X |  |
| 3.2.4.2. | If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers. | X |  |
| 3.2.4.3. | The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers. | X |  |
| 3.2.4.4. | The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:   1. In countries where workers’ compensation is not provided through government schemes or a collective bargaining agreement: 2. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period; 3. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or 4. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker’s employment at the mining project. 5. In countries that do not provide for worker rehabilitation as part of their workers’ compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and 6. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker’s body, if appropriate, as well as compensation that is equal to or greater than three months’ salary of the deceased worker. | X |  |
| 3.2.5.1. | The operating company and workers’ representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures. | X |  |
| 3.2.5.2. | The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:   1. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals; 2. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers’ interests; 3. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory; 4. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and 5. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. | X |  |
| 3.2.5.3. | Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results. | X |  |
| 3.2.5.4. | The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken. | X |  |
| 3.2.6.1. | The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers’ health and safety representatives. | X |  |
| 3.2.6.2. | The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the heath data management system. | X |  |
| 3.2.6.3. | The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations. | X |  |

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| Chapter 3.3—Community Health and Safety |  | Basis for rating |
| Chapter Not Relevant | **—** |  |

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| Chapter 3.3—Community Health and Safety | |  | Basis for rating |
| 3.3.1.1. | Critical The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:   1. General mining operations; 2. Operation of mine-related equipment or vehicles on public roads; 3. Operational accidents; 4. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); 5. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6); 6. Mining-related effects on community demographics, including in-migration of mine workers and others; 7. Mining-related impacts on availability of services; 8. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and 9. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project. | X |  |
| 3.3.1.2. | Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure). | X |  |
| 3.3.1.3. | Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities. | X |  |
| 3.3.2.1. | The operating company shall carry out an assessment of risks and impacts to:   1. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping; 2. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. | X |  |
| 3.3.3.1. | The operating company shall document and implement a community health and safety risk management plan that includes:   1. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and 2. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. | X |  |
| 3.3.3.2. | Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation. | X |  |
| 3.3.3.3. | The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring. | X |  |
| 3.3.4.1. | If the operating company’s risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:   1. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining; 2. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers’ organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and 3. Make information publicly available on its infectious disease mitigation program. | X |  |
| 3.3.4.2. | If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:   1. In relation to HIV/AIDS, the operating company shall, at minimum: 2. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees; 3. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate; 4. Provide access for contractors to education and other preventative programs, and to work with the operating company’s or facility’s contracting companies or others to identify ways for contract workers to access affordable treatment; and 5. Work with public health authorities, communities, workers’ organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members. 6. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate. 7. In relation to malaria, the operating company shall, at minimum: 8. Develop a vector control plan; 9. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and 10. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing. | X |  |
| 3.3.5.1. | The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:   1. Scoping of community health and safety risks and impacts related to mining; 2. Assessment of significant community health and safety risks and impacts related to mining; 3. Development of prevention or mitigation strategies; 4. Collection of any data needed to inform the health risk and impact assessment process; and 5. Design and implementation of community health and safety monitoring programs. | X |  |
| 3.3.6.1. | The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available. | X |  |

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| Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas |  | Basis for rating |
| Chapter not assessed | **—** | IRMA is not scoring this chapter in 2022, just collecting information to help inform future guidance on chapter implementation. |

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| Chapter 3.5—Security Arrangements | |  | Basis for rating |
| 3.5.1.1. | The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force. | X |  |
| 3.5.1.2. | Critical The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company’s procedures shall require that:   1. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; 2. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and 3. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. | X |  |
| 3.5.1.3. | If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:   1. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company’s procedures on the use of force and firearms; 2. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and 3. Outlines required training for security personnel. | X |  |
| 3.5.1.4. | If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3. | X |  |
| 3.5.2.1. | The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment. | X |  |
| 3.5.2.2. | Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:   1. Follow a credible process/methodology; 2. Be carried out and documented by competent professionals; and 3. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice. | X |  |
| 3.5.2.3. | The scope of the security risk assessment shall include, but need not be limited to:   1. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; 2. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption); 3. Analysis of current and potential conflicts or violence in the host country and affected communities; and 4. Risks associated with equipment transfers. | X |  |
| 3.5.2.4. | The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective. | X |  |
| 3.5.2.5. | If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3. | X |  |
| 3.5.3.1. | The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force. | X |  |
| 3.5.3.2. | The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force. | X |  |
| 3.5.4.1. | Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company’s policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers. | X |  |
| 3.5.4.2. | If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security. | X |  |
| 3.5.5.1. | The operating company shall:   1. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; 2. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company’s policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies; 3. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers; 4. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; 5. Provide medical assistance to all injured persons, including offenders; and 6. Ensure the safety of victims and those filing security-related allegations. | X |  |
| 3.5.5.2. | In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents. | X |  |
| 3.5.6.1. | If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company’s procedures on the use of force and firearms. | X |  |
| 3.5.6.2. | The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company’s security arrangements and its efforts to manage security in a manner that respects human rights. | X |  |
| 3.5.6.3. | Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security. | X |  |
| 3.5.6.4. | If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns. | X |  |

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| Chapter 3.6—Artisanal and Small-Scale Mining |  | Basis for rating |
| Chapter Not Relevant | **—** |  |

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| Chapter 3.6—Artisanal and Small-Scale Mining | |  | Basis for rating |
| 3.6.1.1. | When the large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring. | X |  |
| 3.6.2.1. | When the operating company has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, it shall:   1. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (See IRMA Chapter 1.2);   Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning;  Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and  d. Inform ASM entities and communities that there is an operational-level grievance mechanism available to raise concerns and resolve conflicts related to the LSM operation (See IRMA Chapter 1.4). | X |  |
| 3.6.3.1. | The operating company shall ensure that mine security personnel are trained in respecting the human rights of individuals engaged in ASM activities, and members of affected communities. | X |  |
| 3.6.3.2. | The operating company shall demonstrate that it has considered opportunities to enhance positive safety, environmental and social impacts of ASM activities for the benefit of ASM entities and host communities. | X |  |
| 3.6.4.1. | When the LSM mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:   1. Regularly assess the social and environmental risks and impacts related to the ASM entities with whom they have a commercial relationship;   Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and  monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks. | X |  |
| 3.6.4.2. | When the LSM mine has commercial relationships with ASM entities that are located in conflict-affected or high-risk areas, the operating company shall carry out due diligence related to those ASM entities as required in IRMA Chapter 3.4. | X |  |

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| Chapter 3.7—Cultural Heritage | |  | Basis for rating |
| 3.7.1.1. | Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals. | X |  |
| 3.7.1.2. | Screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage shall include consultations with relevant stakeholders. | X |  |
| 3.7.1.3. | Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues. | X |  |
| 3.7.2.1. | Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities. | X |  |
| 3.7.2.2. | If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected. | X |  |
| 3.7.3.1. | When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:   1. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it; 2. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; 3. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and 4. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. | X |  |
| 3.7.3.2. | All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. | X |  |
| 3.7.4.1. | The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:   1. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and 2. Any removal of cultural heritage is conducted using the best available technique. | X |  |
| 3.7.4.2. | All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. | X |  |
| 3.7.5.1. | Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:   1. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and 2. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples’ critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples). | X |  |
| 3.7.5.2. | When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:   1. Comply with the requirement 3.7.5.1; 2. Comply with the protected area’s management plan; 3. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and 4. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. | X |  |
| 3.7.5.3. | IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6). • World Heritage Sites, and areas on a State Party’s official Tentative List for World Heritage Site Inscription; • International Union for Conservation of Nature (IUCN) protected area management categories I-III; • Core areas of UNESCO biosphere reserves. | X |  |
| 3.7.5.4. | An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:   1. The mine was developed prior to the area’s official designation; 2. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and 3. The operating company collaborates with relevant management authorities to integrate the mine’s management strategies into the protected area’s management plan. | X |  |
| 3.7.5.5. | To safeguard irreplaceable cultural heritage and respect indigenous peoples’ right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation. | X |  |
| 3.7.6.1. | Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development. | X |  |
| 3.7.6.2. | The operating company shall not proceed with such commercialization unless it:   1. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and 2. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. | X |  |
| 3.7.6.3. | Where the operating company proposes to use indigenous peoples’ cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples. | X |  |
| 3.7.7.1. | A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage. | X |  |
| 3.7.7.2. | If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:   1. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed; 2. Managing potential impacts to 3. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and 4. If the mining project affects indigenous peoples’ cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. | X |  |
| 3.7.7.3. | The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management. | X |  |

## Principle 4: Environmental Responsibility–appendix

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| RATING LEGEND Description of performance |  | L | Fully meets |
|  | m | Substantially meets |
|  | l | Partially meets |
|  | E | Does not meet |
|  | **—** | Not relevant |

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| Chapter 4.1—Waste and Materials Management | |  | Basis for rating |
| 4.1.1.1. | The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities. | X |  |
| 4.1.1.2. | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:   1. Having the policy approved by senior management and endorsed at the Director/Governance level of the company; 2. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities; 3. Having procedures and/or protocols in place to implement the policy; and 4. Allocating a sufficient budget to enable the effective implementation of the policy. | X |  |
| 4.1.2.1. | The operating company shall:   1. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and 2. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. | X |  |
| 4.1.3.1. | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | X |  |
| 4.1.3.2. | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:   1. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW); 2. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include: 3. Analysis of petrology, mineralogy, and mineralization; 4. Identification of geochemical test units; 5. Estimation of an appropriate number of samples for each geochemical test unit; and 6. Performance of comprehensive geochemical testing on all samples from each geochemical test unit. 7. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility; 8. Water balance and chemistry mass balance models for each facility; and 9. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | X |  |
| 4.1.3.3. | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:   1. Detailed engineering reports, including site investigations, seepage and stability analyses; 2. Independent technical review (See criteria 4.1.6) 3. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment; 4. Descriptions of facility design criteria; 5. Design report(s); 6. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns; 7. Master tailings placement plan (based on life of mine); 8. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report; 9. Facility water balances (See also 4.1.3.2.d); and 10. Dam breach inundation (if applicable) and waste rock dump runout analyses. | X |  |
| 4.1.3.4. | Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle. | X |  |
| 4.1.3.5. | Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected. | X |  |
| 4.1.4.1. | Critical A risk-based approach to mine waste assessment and management shall be implemented that includes:   1. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle; 2. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle; 3. Updating of risk assessments at a frequency commensurate with each facility’s risk profile, over the course of the facility’s life cycle; and 4. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | X |  |
| 4.1.4.2. | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:   1. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses; 2. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives; 3. Carry out a screening or “fatal flaw” analysis to eliminate alternatives that fail to meet minimum specifications; 4. Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative; 5. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and 6. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management). | X |  |
| 4.1.5.1. | Critical Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | X |  |
| 4.1.5.2. | Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:   1. Priority shall be given to source control measures to prevent generation of contaminants; 2. Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and 3. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes. | X |  |
| 4.1.5.3. | For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada’s Tailings Management Guide. | X |  |
| 4.1.5.4. | Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information. | X |  |
| 4.1.5.5. | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:   1. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters; 2. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices; 3. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility; 4. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and 5. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. | X |  |
| 4.1.5.6. | Critical On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:   1. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); 2. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); 3. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and 4. Inform the management review to facilitate continual improvement (see 4.1.5.8). | X |  |
| 4.1.5.7. | The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities. | X |  |
| 4.1.5.8. | The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:   1. Align with the steps outlined in the Mining Association of Canada’s Tailings Management Protocol or a similar framework; and 2. Be documented, and the results reported to an accountable executive officer. | X |  |
| 4.1.6.1. | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | X |  |
| 4.1.6.2. | Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body. | X |  |
| 4.1.6.3. | Independent reviewers shall be objective, third-party, competent professionals. | X |  |
| 4.1.6.4. | Independent review bodies shall report to the operation’s general manager and an accountable executive officer of the operating company or its corporate owner. | X |  |
| 4.1.6.5. | The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan’s implementation. All of this information shall be made available to IRMA auditors. | X |  |
| 4.1.7.1. | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | X |  |
| 4.1.7.2. | Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers’ representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5). | X |  |
| 4.1.7.3. | Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5). | X |  |
| 4.1.7.4. | If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies. | X |  |
| 4.1.8.1. | Critical At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA. | X |  |

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| Chapter 4.2—Water Management | |  | Basis for rating |
| 4.2.1.1. | The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices. | X |  |
| 4.2.1.2. | The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine’s water management practices. | X |  |
| 4.2.1.3. | The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes. | X |  |
| 4.2.2.1. | The operating company shall gather baseline or background data to reliably determine:   1. The seasonal and temporal variability in: 2. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project; 3. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and 4. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. | X |  |
| 4.2.2.2. | The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:   1. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and 2. The mine’s use of water, and any mining activities that may affect water quantity. | X |  |
| 4.2.2.3. | Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:   1. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources; 2. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels); 3. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and 4. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. | X |  |
| 4.2.2.4. | Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected. | X |  |
| 4.2.3.1. | The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine’s water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy. | X |  |
| 4.2.3.2. | If a surface water or groundwater mixing zone is proposed as a mitigation strategy:   1. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and 2. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum: 3. Surface water or groundwater mixing zones are as small as practicable; 4. Water in a surface water mixing zone is not lethal to aquatic life; 5. A surface water mixing zone does not interfere with the passage of migratory fish; 6. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and 7. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable. | X |  |
| 4.2.3.3. | Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:   1. Being maintained at baseline or background levels; or 2. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). | X |  |
| 4.2.3.4. | Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). | X |  |
| 4.2.4.1. | Critical (a through e) The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:   1. Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics); 2. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; 3. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; 4. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; 5. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and 6. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables. | X |  |
| 4.2.4.2. | Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis. | X |  |
| 4.2.4.3. | The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:   1. Participation may involve the use of independent experts selected by the community; and 2. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. | X |  |
| 4.2.4.4. | Critical The operating company shall develop and implement an adaptive management plan for water that:   1. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and 2. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion. | X |  |
| 4.2.4.5. | Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes. | X |  |
| 4.2.4.6. | Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans. | X |  |
| 4.2.5.1. | The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities:   1. Monitoring data for surface water and groundwater points of compliance; and 2. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations. | X |  |
| 4.2.5.2. | The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources. | X |  |
| 4.2.5.3. | The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | X |  |

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| Chapter 4.3—Air Quality | |  | Basis for rating |
| 4.3.1.1. | The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations. | X |  |
| 4.3.1.2. | During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area. | X |  |
| 4.3.1.3. | If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts. | X |  |
| 4.3.1.4. | The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport and dispersion of mining-related air contaminants. | X |  |
| 4.3.2.1. | Critical If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality. | X |  |
| 4.3.2.2. | Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life. | X |  |
| 4.3.3.1. | The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring. | X |  |
| 4.3.3.2. | Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results. | X |  |
| 4.3.4.1. | New mines and existing mines shall comply with the European Union’s Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:   1. If a mine is located in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or 2. If a mine is located in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project’s emissions. | X |  |
| 4.3.4.2. | As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:   1. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard; 2. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply; 3. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and 4. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines. | X |  |
| 4.3.4.3. | Dust deposition from mining-related activities shall not exceed 350 mg/m2/day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination. | X |  |
| 4.3.5.1. | The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available, or made available to stakeholders upon request. | X |  |

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| Chapter 4.4—Noise and Vibration | |  | Basis for rating |
| 4.4.1.1. | The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project’s noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels. | X |  |
| 4.4.1.2. | If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors. | X |  |
| 4.4.2.1. | If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms. | X |  |
| 4.4.2.2. | The following exceptions to 4.4.2.1 apply:   1. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or 2. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met. | X |  |
| 4.4.2.3. | If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA. | X |  |
| 4.4.2.4. | If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:   1. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period; 2. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and 3. Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time. | X |  |
| 4.4.2.5. | Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when the operating company can demonstrate one or more of the following:   1. There are no nearby human noise receptors that will be impacted by blasting noise or vibration; 2. Alternative hours are necessary and/or appropriate because of local, cultural or social norms; and/or 3. Potentially affected human receptors have given voluntary approval for the expanded blasting hours. | X |  |
| 4.4.2.6. | If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered. | X |  |
| 4.4.2.7. | All noise- and vibration-related complaints and their outcomes shall be documented. | X |  |
| 4.4.3.1. | When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request. | X |  |

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| Chapter 4.5—Greenhouse Gas Emissions | |  | Basis for rating |
| 4.5.1.1. | Critical The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:   1. Identifying and measuring greenhouse gas emissions from the mining project; 2. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project; 3. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and 4. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions. | X |  |
| 4.5.2.1. | The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative’s GRI 305 emissions reporting standard. | X |  |
| 4.5.3.1. | The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy. | X |  |
| 4.5.3.2. | The operating company shall demonstrate progress toward its greenhouse gas reduction targets. | X |  |
| 4.5.3.3. | The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations. | X |  |
| 4.5.4.1. | The greenhouse gas policy shall be publicly available. | X |  |
| 4.5.4.2. | On an annual basis, the operating company or its corporate owner shall:   1. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and 2. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions. | X |  |

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| Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas | |  | Basis for rating |
| 4.6.1.1. | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | X |  |
| 4.6.1.2. | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts. | X |  |
| 4.6.1.3. | Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request. | X |  |
| 4.6.2.1. | Critical New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities. | X |  |
| 4.6.2.2. | Screening shall include identification and documentation of:   1. Boundaries of legally protected areas in the mine’s actual or proposed area of influence, and the conservation values being protected in those areas; 2. Boundaries of Key Biodiversity Areas (KBA) in the mine’s actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values; 3. Areas of modified habitat, natural habitat and critical habitat within the mine’s proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and 4. Natural ecosystems or processes within the mine’s proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. | X |  |
| 4.6.3.1. | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:   1. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine’s proposed or actual area of influence; 2. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine’s lifecycle; 3. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and 4. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | X |  |
| 4.6.4.1. | Critical Mitigation measures for new mines shall:   1. Follow the mitigation hierarchy of: 2. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them; 3. Where impacts are not avoidable, minimizing impacts to the extent possible; 4. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and 5. As a last resort, offsetting the residual impacts. 6. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process; 7. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure. | X |  |
| 4.6.4.2. | At existing mines:   1. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite restoration strategies, and also, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and 2. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., as a result of mine expansions, etc.), the operating company shall follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts. | X |  |
| 4.6.4.3. | Offsetting, if required, shall be done in a manner that aligns with international best practice. | X |  |
| 4.6.4.4. | The operating company shall develop and implement a biodiversity management plan or equivalent that:   1. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services; 2. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time; 3. Provides a budget and financing plan to ensure that funding is available for effective mitigation. | X |  |
| 4.6.4.5. | Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle. | X |  |
| 4.6.5.1. | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:   1. Demonstrates that the proposed development in such areas is legally permitted; 2. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project; 3. Conducts mining-related activities in a manner consistent with protected 4. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | X |  |
| 4.6.5.2. | An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized. • International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; • Ramsar sites that are not IUCN protected area management categories I-III; and • Buffer zones of UNESCO biosphere reserves. | X |  |
| 4.6.5.3. | Critical IRMA will not certify new mines that are developed in or that adversely affect the following protected areas: • World Heritage Sites, and areas on a State Party’s official Tentative List for World Heritage Site Inscription; • IUCN protected area management categories I-III; • Core areas of UNESCO biosphere reserves. | X |  |
| 4.6.5.4. | Critical An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:   1. The mine was developed prior to the area’s official designation; 2. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and 3. The operating company collaborates with relevant management authorities to integrate the mine’s management strategies into the protected area’s management plan. | X |  |
| 4.6.6.1. | The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle. | X |  |
| 4.6.6.2. | Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time. | X |  |
| 4.6.6.3. | If monitoring reveals that the operating company’s protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders. | X |  |
| 4.6.6.4. | The findings of monitoring programs shall be subject to independent review. | X |  |

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| Chapter 4.7—Cyanide Management |  | Basis for rating |
| Chapter Not Relevant | **—** |  |

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| Chapter 4.7—Cyanide Management | |  | Basis for rating |
| 4.7.1.1. | Critical If the operating company is eligible to be a signatory to the Cyanide Code, it shall obtain a certification of compliance in accordance with the requirements of the International Cyanide Management Institute (ICMI). | X |  |
| 4.7.1.2. | If the operating company is not eligible to become a signatory of the Cyanide Code, but the mining project requires the storage onsite of cyanide in bags or bulk containers, or uses cyanide in a mill process, the mine’s cyanide management practices shall be:   1. Audited against the Cyanide Code’s “Gold Mining Operation Verification Protocol” by auditors meeting ICMI requirements; and 2. Verified as being generally consistent with Cyanide Code requirements. | X |  |
| 4.7.1.3. | The operating company shall demonstrate that it has taken steps to ensure that cyanide producers and transporters supplying the mining project are certified as meeting the “Cyanide Production and Transport Practices” of the Cyanide Code. | X |  |
| 4.7.2.1. | In addition to the requirements of the Cyanide Code, the following design criteria shall be met:   1. Impermeable secondary containment for cyanide unloading, storage, mixing and process tanks shall be sized to hold a volume at least 110% of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event; and 2. Pipelines containing process water (or process solution) shall utilize secondary containment in combination with audible alarms, interlock systems, and/or sumps, as spill control measures. | X |  |
| 4.7.3.1. | Discharges to a surface water mixing zone shall not contain cyanide, either alone or in combination with other toxins, that will that will be lethal to resident aquatic life or interfere with the passage of migratory fish. | X |  |
| 4.7.4.1. | The operating company shall carry out baseline water quality sampling and monitor discharges to surface waters or groundwater for weak acid dissociable (WAD) cyanide. | X |  |
| 4.7.4.2. | If WAD cyanide is detected in discharges to surface waters, then the operating company shall also monitor total cyanide, free cyanide, and thiocyanate levels. | X |  |
| 4.7.5.1. | Cyanide water quality monitoring data shall be published on at least a quarterly basis in tabular format, and graphical format if available, on the mine or the operating company website, or provided to stakeholders upon request. | X |  |
| 4.7.5.2. | If the operating company is a Cyanide Code signatory it shall include in its annual report or sustainability report a link to the company’s audit information and corrective actions published on the ICMI website. | X |  |

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| Chapter 4.8—Mercury Management |  | Basis for rating |
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| Chapter 4.8—Mercury Management | |  | Basis for rating |
| 4.8.1.1. | A mining project with a mercury emission control system shall perform a mercury mass balance that assesses and documents the amount of mercury in waste rock and ore, and the amount of mercury during or after processing that is:   1. Released to air and water;   Produced as by-product; and  Resident in tailings ponds, waste rock dumps, or other mine waste facilities. | X |  |
| 4.8.2.1. | Any mine facility that uses a thermal process to treat material containing mercury (e.g., ore, concentrate) shall utilize best available techniques (BAT) and best environmental practices (BEP) to control and minimize the amount of mercury released to the atmosphere unless the operating company can demonstrate that mercury emissions from the mining project are unlikely to pose a significant risk to human health or the environment. | X |  |
| 4.8.2.2. | Mercury recovered from mercury emission control systems:   1. Shall not be stored on-site or disposed with tailings after removal;   Shall not be sold or given away either directly or indirectly to an entity engaged in artisanal or small-scale mining; and  Shall be sold only for an end use listed in Annex A (Products) or Annex B (Processes) of the Minamata Convention on Mercury or sent to a regulated repository for mercury wastes. | X |  |
| 4.8.2.3. | As an exception to 4.8.2.2.a, wastes from mercury emission control systems that contain mercury may be stored or disposed of on-site only if:   1. A risk-based evaluation of the on-site storage or disposal of mercury waste demonstrates that the risk of long-term contamination is low; and   Disposal occurs in fully lined tailings storage facilities using synthetic liners that have a permeability of 10-9 cm/sec or less. | X |  |
| 4.8.3.1. | For each mining project with a source of mercury air emissions a mercury monitoring plan shall be developed in consultation with relevant stakeholders. | X |  |
| 4.8.3.2. | The mercury monitoring plan shall address:   1. Potential public health impacts (e.g., food source and blood level mercury);   Environmental impacts monitoring (e.g., fish tissue and stream sediment mercury levels), including locations that are most likely to promote methylation, such as still waters, wetlands, and anaerobic sediment; an  Mercury air emission monitoring, which shall be conducted at least annually for direct releases to the atmosphere from an autoclave, roaster, carbon kiln, refining furnace, or other thermal process that has a mercury emission control system. | X |  |
| 4.8.3.3. | The mercury monitoring plan shall include the monitoring of:   1. The quantity of mercury released to air including fugitive emissions (to the extent technologically and economically feasible with air monitoring equipment);   The quantity of mercury released to water, including the forms of mercury;  The amount of mercury captured in a mercury emission control system; and  The amount of by-product mercury produced (including the mercury captured by a mercury emission control system); and  Methyl mercury and sulfate, if mines have a mercury emission control system. In such cases, sampling shall be regularly conducted in wetlands and water bodies on or near the mine site. | X |  |
| 4.8.4.1. | The operating company shall report publicly, at least annually, a summary report of the findings from the implementation of the mercury monitoring plan, including the monitoring data. | X |  |
| 4.8.1.1. | A mining project with a mercury emission control system shall perform a mercury mass balance that assesses and documents the amount of mercury in waste rock and ore, and the amount of mercury during or after processing that is:   1. Released to air and water;   Produced as by-product; and  Resident in tailings ponds, waste rock dumps, or other mine waste facilities. | X |  |

# Endnotes

1. <https://tools.responsiblemining.net/self-assess/> [↑](#endnote-ref-1)
2. All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version (IRMA Certification Body Requirements, v.1.0) is available at: <https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf> [↑](#endnote-ref-2)
3. See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. <https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf> [↑](#endnote-ref-3)
4. See IRMA Certification Body Requirements, v.1.0, p 32. <https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf> [↑](#endnote-ref-4)
5. IRMA website: “Complaints and Feedback.” <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/> [↑](#endnote-ref-5)
6. IRMA Issues Resolution System Procedure. Verson 1.0. January 2020. <https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf> [↑](#endnote-ref-6)
7. IRMA web site “Mines Site Assessments”: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/> [↑](#endnote-ref-7)
8. For more information, see the IRMA Guidance Note on Chapter 2.1: <https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf>) [↑](#footnote-ref-1)
9. For mines that involved resettlement prior to April 30, 2006, IRMA does not require that the requirements in this chapter be met. It should be noted, however, that if, in interviewing stakeholders, there is evidence of human-rights-related impacts associated with historic resettlement programs that have not been mitigated or remediated, they will need to be addressed as per Chapter 1.3; and other unremediated impacts may be raised by stakeholders and addressed through the operational-level grievance mechanism as per Chapter 1.4. [↑](#footnote-ref-2)