

What are “Critical Requirements” in the IRMA Standard?

A set of requirements have been identified by the IRMA Board of Directors as being critical requirements that any mine site claiming to be following good practices in mining should be meeting. Table 1 contains the list of critical requirements in each of the 4 principle areas of the IRMA Standard. Note that while the list below contains 30 elements some of them refer to more than one IRMA requirement. In total there are 40 IRMA requirements referenced in the table below.

Certified mines must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, and develop corrective actions plans that outline how they will fully meet the requirements within specified time frames.

Not all critical requirements will be relevant at all mine sites. For example, if there was no resettlement, or if mines are not located in conflict-affected or high-risk areas, those critical requirements will not be evaluated or included in the mine's score.

Table 1. IRMA's Critical Requirements

Principle 1 – Business Integrity
1. The operating company complies with host country laws that are applicable to the mining project (1.1.1.1).
2. The mine fosters two-way dialogue and meaningful engagement with stakeholders (1.2.2.2).
3. The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights (1.3.1.1) and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships (1.3.2.1). The operating company is taking steps to remediate any known impacts on human rights caused by the mine (1.3.3.3).
4. Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation (1.4.1.1).
5. The operating company has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors (1.5.5.1).
Principle 2 – Planning and Managing for Positive Legacies
6. The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project (2.1.3.1).
7. New mine sites have obtained the FPIC of indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected indigenous peoples and provides remedies for past impacts on indigenous peoples' rights and interests. (2.2.2.2 and scope of application)
8. If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met (2.4.7.1).
9. All operations related to the mining project shall have an emergency response plan (2.5.1.1) and there is community participation in emergency response planning exercises (2.5.2.1).
10. Reclamation and closure plans are compatible with protection of human health and the environment, and are available to stakeholders (2.6.2.1 and 2.6.2.6).
11. Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring) (2.6.4.1).

Principle 3 – Social Responsibility

12. Workers' freedom of association is respected (3.1.2.1).

13. Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers (3.1.3.3).

14. Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues (3.1.5.1).

15. No children (i.e., persons under the age of 18) are employed to do hazardous work (3.1.7.2) and no children under the age of 15 are employed to do non-hazardous work (3.1.7.3).

16. There is no forced labor at the mine site or used by the operating company (3.1.8.1).

17. Workers are informed of the hazards associated with their work, the health risks involved and relevant preventive and protective measures (3.2.4.1.a and b).

18. The risks to community health and safety posed by the mining operation are evaluated and mitigated (3.3.1.1).

19. If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights (3.4.2.1).

20. The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel (3.5.1.2).

Principle 4 - Environmental Responsibility

21. A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities (4.1.4.1). Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices (4.1.5.1).

22. The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities (4.1.5.6).

23. The mine does not use riverine, submarine or lake disposal for mine wastes (4.1.8.1).

24. Water quality and quantity are being monitored at the mine site (4.2.4.1.a through e) and adverse impacts resulting from the mining operation are being mitigated (4.2.4.4).

25. When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan (4.3.2.1).

26. There is a policy being implemented that includes targets for reducing greenhouse gas emissions (4.5.1.1).

27. The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas (4.6.2.1), and these impacts are being mitigated and minimized (4.6.4.1).

28. New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves (4.6.5.3), and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized (4.6.5.4).

29. Gold or silver mines using cyanide are certified as complying with the Cyanide Code (4.7.1.1).

30. Mercury wastes are not permanently stored on site without adequate safeguards (4.8.2.3), are not sold or given to artisanal or small-scale miners, and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories (4.8.2.2).

ERRATA:

In a previous version, requirement 4.6.5.3 referenced in item 28, above, was incorrectly referenced as 4.6.5.2. It has been corrected in this version.