

# How to File a Complaint Related to IRMA?

*The IRMA Issues Resolution System Procedure*

September 2021

IRMA Community Toolkit

**IRMA**  Initiative for Responsible  
Mining Assurance

## What is IRMA?



- IRMA is a coalition of NGOs, affected communities, purchasers, investors, mining companies, and labor unions. Each sector has equal voice in IRMA governance.
- IRMA is a high-bar standard to drive responsible mining, defined through the *IRMA Standard for Responsible Mining*
- IRMA is a global organization managing IRMA standards and the system for independent third-party audits against those standards



# The IRMA Community Toolkit

This is one of multiple modules in the IRMA community toolkit created to help you better understand IRMA and how it can be utilized to serve directly impacted communities.

Access materials introducing IRMA and covering other topics at <https://responsiblemining.net/>.

Leave feedback, suggest new tools and materials, or request a presentation for your community at [info@responsiblemining.net](mailto:info@responsiblemining.net).

# The IRMA Standard for Responsible Mining

Comprehensive coverage of mining issues in 26 chapters under four principles

## Business Integrity

- Legal compliance
- Stakeholder engagement
- Stakeholder grievance mechanism
- Human rights due diligence
- Revenue transparency / anti-corruption

## Planning for Positive Legacies

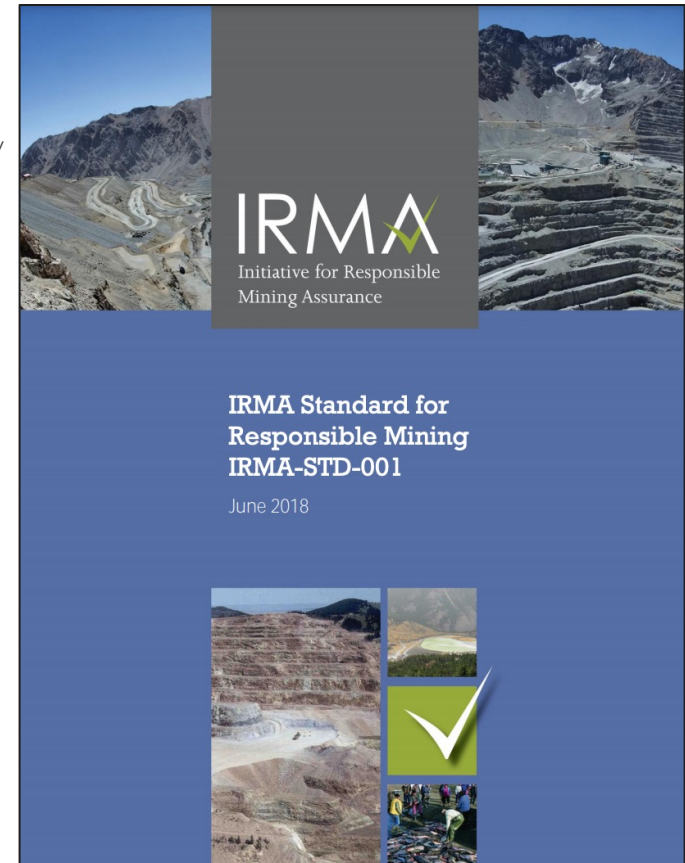
- Environmental and social impact assessment and management
- Free, Prior and Informed Consent
- Community support and benefits
- Resettlement
- Emergency preparedness and response
- Planning and financing reclamation and closure

## Social Responsibility

- Labor rights
- Worker health & safety
- Community health and safety
- Conflict affected areas
- Security arrangements
- Cultural heritage protection
- Artisanal and small-scale mining (ASM)

## Environmental Responsibility

- Water management
- Water (tailings) management
- Air quality
- Greenhouse gases emissions
- Noise management
- Biodiversity, ecosystem services, protected areas
- Cyanide management
- Mercury management



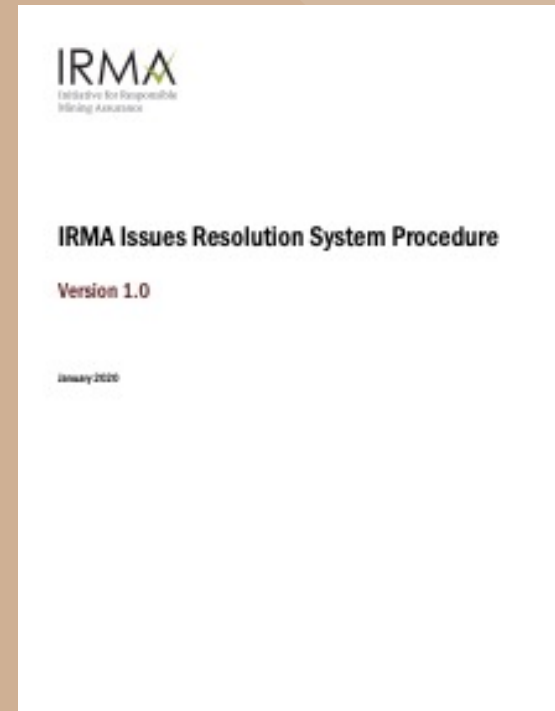
# What is the IRMA Issues Resolution System Procedure?

IRMA welcomes stakeholder engagement, complaints, and input on all IRMA activities, including feedback on IRMA standards, audits, and certifications.

The IRMA Issues Resolution System Procedure is a process that ensures that **we take your complaints seriously**. We make impartial efforts to resolve and document all complaints and their resolutions.

This presentation will help guide you through the procedure.

Access IRMA's Issues Resolution System Procedure at <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>.



# The IRMA Issues Resolution System

## Who May Bring a Complaint?

**Anyone.** Any party may bring a complaint. We are open to complaints from representatives of communities, unions, NGOs, companies, purchasers, investors, YOU—anyone may bring a complaint.

## What Topics Can be Subjects of Complaints?

**Any topic.** We are open to complaints regarding any concerns you may have related to IRMA standards, audits, certification, personnel, or any aspect of the IRMA program.

## When May Complaints be Brought?

**Any time.** We want to hear from you as soon as you can bring your complaint. Sooner is often better, but we want to hear from you when you are ready to bring your complaint.

# How to File a Complaint?

The image shows a preview of the IRMA Stakeholder Complaint Form. At the top left is the IRMA logo with the tagline 'Institute for Responsible Mining Initiative'. To the right of the logo is the title 'Stakeholder Complaint Form'. Below the title is a dark grey header with the text 'Complaints Process' in white. The main body of the form contains several paragraphs of text explaining the process. The first paragraph states that IRMA has developed procedures to resolve issues such as stakeholder complaints, and that stakeholders may use this form to submit complaints about the IRMA Standard, the IRMA certification system, or IRMA policies or personnel. The second paragraph explains that complaints related to the independent, third-party assessment of a particular mine site should be submitted to the Certification Body (CB) that is carrying out the assessment, and that contact information for the CBs can be found on the IRMA website: 'Mine Sites Under Assessment'. The third paragraph describes the first step of the process: the IRMA Secretariat shall try to resolve complaints through an informal discussion with the person(s) raising the issue, even if the person(s) would like his/her/their name to remain confidential (i.e., not be shared with parties other than the IRMA Secretariat and others tasked to help resolve the issue). The fourth paragraph states that IRMA understands that a small number of people may wish to remain entirely anonymous (i.e., not disclose their name even to IRMA), and in such situations, the IRMA Secretariat would still like the opportunity to speak with the person(s) raising the issue, if at all possible. For example, a person could provide a phone number to call or text, so that arrangements can be made for a follow-up phone or internet call with IRMA. The final paragraph states that if no arrangement is made to have an informal discussion, the IRMA Secretariat will still review a complaint. In such cases, it is strongly recommended that those filing the complaint provide as much detail and supporting evidence as possible. If there is little or no supporting information, and no way to contact a complainant to obtain additional details about the complaint, it may not be possible for IRMA to fully explore and/or resolve the issue to the satisfaction of the complainant.

Access the IRMA Stakeholder Complaint Form at <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

File a complaint using the IRMA Stakeholder Complaint Form available on the IRMA Website. Forms and questions related to complaints may be submitted to [issues@responsiblemining.net](mailto:issues@responsiblemining.net) or by mail to IRMA, P.O. Box 289, Port Townsend, WA 98368, USA.

If you have a complaint related to a specific mine site assessment, contact the Certification Body overseeing the assessment. This information is available on the IRMA website Mines Under Assessment page.



# Types of Information Requested

**The IRMA Stakeholder Complaint Form** is a simple form. It requests information including:

- Name, Address, Contact Information
- Organization/Company/Sector
- Complaint Details:
  - Nature and details of issue
  - When did issue take place?
  - Who was or is involved?
  - Evidence (e.g. photographs, videos, documents, etc.), if any
  - Steps taken to attempt to resolve the issue and outcomes of those efforts
  - Recommended steps or processes to address the issue

# Overview of the Issues Resolution Process

1

## Step 1

### Initial Discussion with IRMA Secretariat

Discuss your issue with the IRMA Secretariat.

2

## Step 2

### Resolution Using Appropriate Pathway

If the issue is not resolved during initial discussion, a resolution pathway is selected for further investigation and consideration of the issue.

3

## Step 3

### Escalation to Ad Hoc Resolution Committee

If the issue remains unresolved, an Ad Hoc Resolution Committee is formed if the stakeholder wishes to proceed with resolution.

# Step 1

## Initial Discussion with IRMA Secretariat

**The first step is to contact the IRMA Secretariat by submitting a Stakeholder Complaint Form** via email or mail to [issues@responsiblemining.net](mailto:issues@responsiblemining.net).

The IRMA Secretariat will attempt to resolve the issue through an informal discussion with the person(s) filing the complaint.

Even if the person(s) filing the complaint do not wish to participate in a discussion (e.g. due to desire to remain anonymous), the IRMA Secretariat will still review the complaint.

# Step 2

## Resolution Using Appropriate Pathway

Below are types of anticipated stakeholder issues and related resolution pathways.

Issue	Pathway
Action/Inaction of Certified Mine or mine at IRMA achievement level	Mine → Certification Body → IRMA → Ad Hoc Resolution Committee
Actions/Inactions of a Certification Body	Certification Body → IRMA → Ad Hoc Resolution Committee
Appeals of Certification Body Decisions	Certification Body → IRMA → Ad Hoc Resolution Committee
IRMA Policies or Procedures	IRMA → Subcommittee of IRMA Board → IRMA Board OR IRMA → Ad Hoc Resolution Committee
IRMA Standards	IRMA → IRMA Scheduled Standard Revision Process
IRMA Personnel	IRMA Personnel → IRMA Executive Director → Ad Hoc Resolution Committee
Other Regarding IRMA Program	Determined by Issue

# Step 3 (If Needed)

## Escalation to an Ad Hoc Resolution Committee

**If all efforts to resolve an issue have been exhausted, stakeholders may raise the issue with an Ad Hoc Resolution Committee**, put together to address the issue. The Committee will include three members selected based on the nature of the issue.

Committee members must know the IRMA program, have relevant expertise, and have no conflicts of interest. Members may include representatives of the following:

- IRMA Board
- IRMA subcommittees or advisory groups
- IRMA member or partner organizations
- Academia from fields relevant to the program
- Civil society
- Specialists in oversight of certification bodies/programs

# Additional Considerations

## Confidentiality

**Stakeholders may bring their issue confidentially** and should inform the IRMA Secretariat if they do not want to be identified to other parties who are the subject of a complaint.

## Anonymity

**Stakeholders may remain anonymous** when filing a complaint. The complaint should have as much detail as possible as the IRMA Secretariat may have no way to seek clarity or further details related to the complaint.

## Safeguarding Stakeholders' Rights and Freedoms

**The IRMA Issues Resolution System** shall not be used to substitute, circumvent or override the legal rights of any party to use judicial or non-judicial mechanisms to remedy or resolve a grievance.

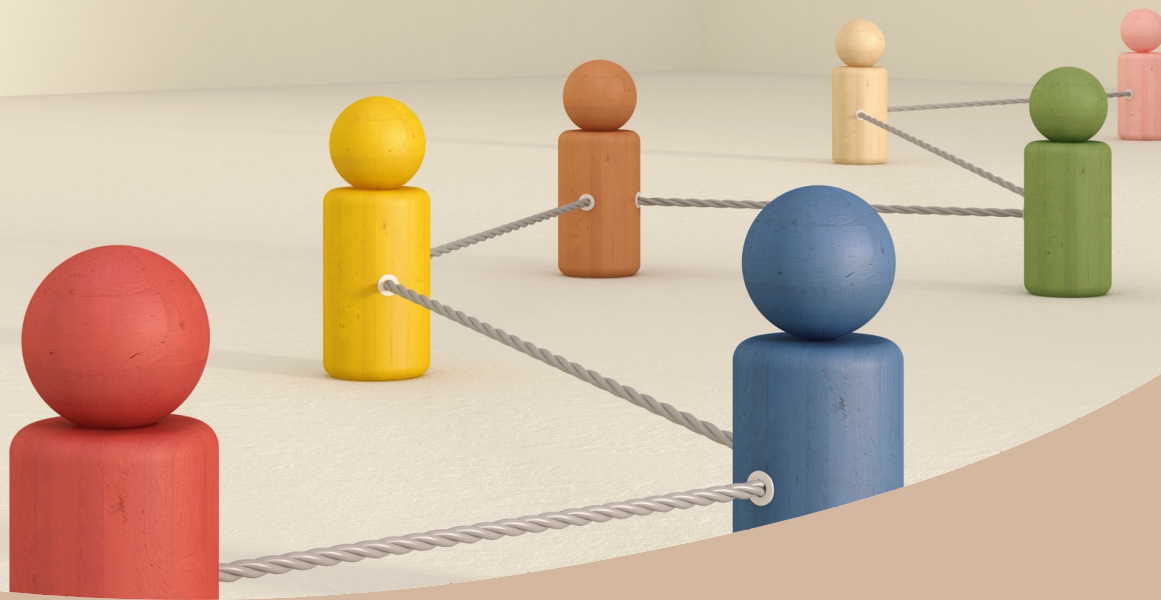
## Conflicts of Interest

**All individuals involved in investigation or decision-making on an issue shall declare any actual or potential conflicts of interest** (e.g. that may compromise impartiality) and disqualify themselves accordingly.

## Assistance Raising Issues

- **You may appoint a representative or advisor** to accompany you in raising your issue with IRMA.
- **You may request translation support from the IRMA Secretariat if necessary** to issue your complaint in English. Send a request via email to [issues@responsiblemining.net](mailto:issues@responsiblemining.net).





Contact us

[info@responsiblemining.net](mailto:info@responsiblemining.net)

<https://responsiblemining.net/>

