



Initiative for Responsible
Mining Assurance

Assessment Manual for Mines

September 2022

responsiblemining.net

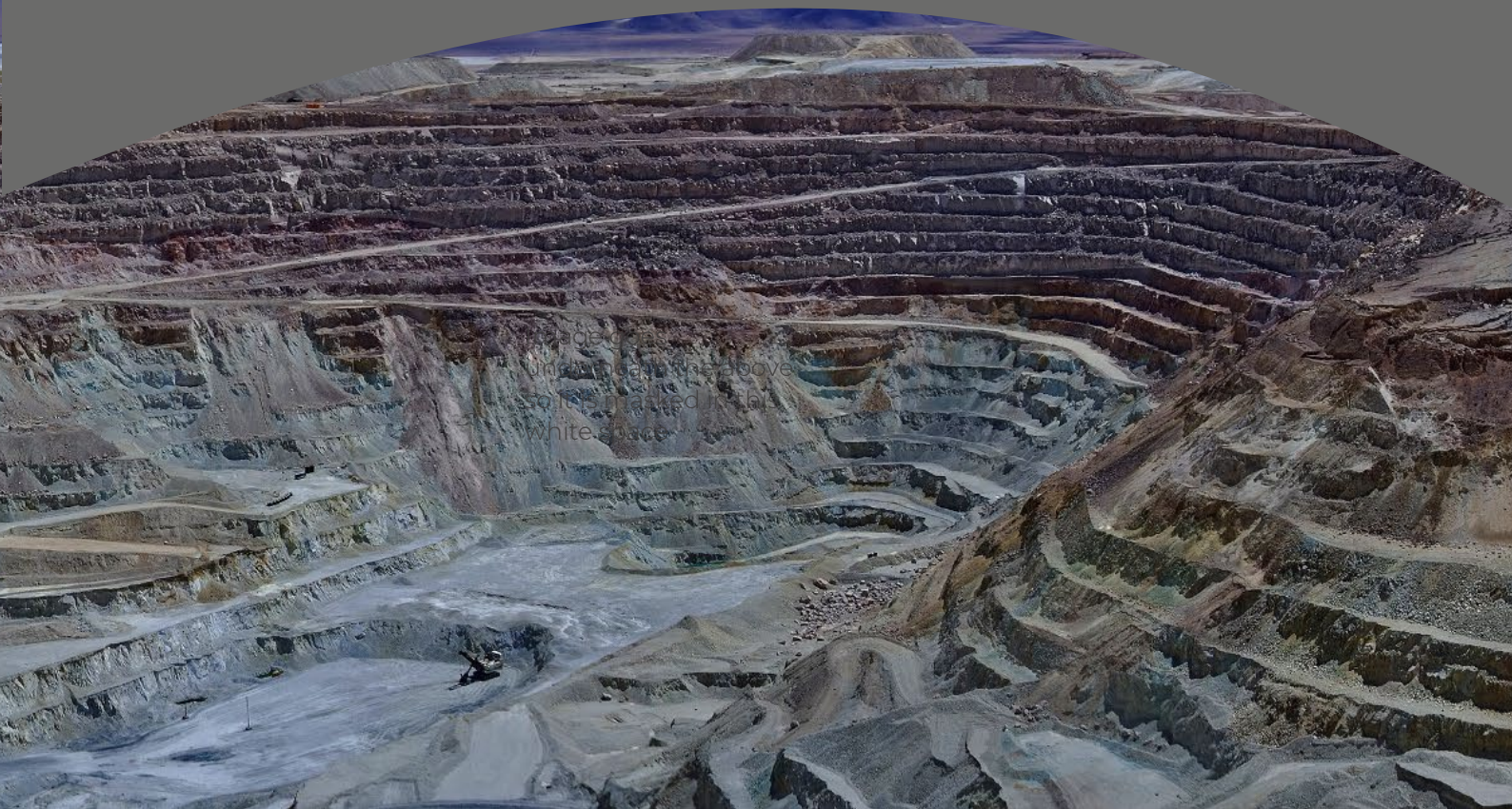


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Revision Updates

In the February 2022 version of the Assessment Manual for Mines, updates included the following:

- On page 9, we have revised the explanation of what is a “new mine”. The IRMA Standard for Responsible Mining released in 2018 defines a new mine as one that becomes operational and applies for IRMA certification after the date that the IRMA Certification system becomes operational (estimated late 2019). That definition has now been reflected in this document.
- On pages 11, 17, 21, 22, 23 and 32, references to the Responsible Mining Map have changed to IRMA Engagement Map. The map was rebranded in February 2022.
- In Annex B, critical requirement 28 incorrectly referenced requirement 4.6.5.2 instead of 4.6.5.3. This has been corrected.

This September 2022 version of the Assessment Manual for Mines has corrections primarily related to the surveillance audit, but also updates references to Certification Body contacts. Updates are as follows:

Under Step 4:

- Specific identification of certification bodies and their contact information has been removed and replaced with a hyperlink to the IRMA website where this information will be kept up to date.

Under Steps 6 and 8:

- Methods of public announcement have been simplified to allow flexibility. References to the Engagement Map have been removed.

Under Step 11:

- In the first paragraph, the word “initial” has been added to clarify that the early corrective action period is only intended to be applied to the initial audit conducted for IRMA achievement.

Under Step 14:

- The previous section entitled “Changes in achievement level” has been replaced/updated with a section entitled “Retaining achievement level.”
- This revised section clarifies what conditions must be met to retain the achievement level previously awarded to the site (either at the initial audit or a recertification audit).
- This revision also removes previous reference to the possibility of fluctuating achievement levels, where an IRMA recognized achievement level could go up or down based on a surveillance audit.
- This revision also clarifies that the previously identified three-month period to correct non-conformities begins with the mine’s receipt of the draft report from the certification body.
- Clarification is provided that a mine can opt to have a fully scoped audit in place of the surveillance audit in order to potentially achieve a revision to their earned achievement level.
- The option to combine the early corrective action review with the surveillance audit has been removed due to incompatible timing.

For Annex D:

- The title has been changed to remove the reference to downgrading achievement levels.
- Throughout Annex D, references to fluctuating or downgraded achievement levels have been removed. Clarification of when the three-month corrective action period for nonconformities identified during a surveillance audit is clarified to begin with the mine’s

receipt of the draft report from the certification body.

- Table 5 reflects corrections to the corrective action period for minor nonconformities of critical requirements. The previous time period indicated was the surveillance audit or next audit, whichever came first. This has been updated to state that minor nonconformities of critical requirements must be corrected by the next recertification audit.

Preamble

The Initiative for Responsible Mining Assurance (IRMA) is the answer to questions posed at its founding in 2006: What does it mean to mine responsibly and how can we best assess operations at a mine site level?

Over the course of a decade, IRMA did the heavy lifting to respond to this query, bringing together a diverse group of stakeholders to craft the world's first shared definition of responsible mining—the IRMA *Standard for Responsible Mining*. IRMA also established a system for independent verification to measure a mine's performance against that standard.

IRMA created this manual to help guide mining company staff and others through IRMA's mine site assessment process.

How IRMA is different than other mining certification systems

Four key components set IRMA apart from other mining standards and certification systems:

- **Applicability:** a comprehensive standard for all geographies and mined materials¹
- **Credibility:** rigorous, independent third-party assessment of mine site performance
- **Equity:** multi-stakeholder governance of the IRMA system and engagement of diverse stakeholders in each audit²
- **Transparency:** public disclosure of audit results detailing achievements and challenges

The Standard for Responsible Mining

The *Standard for Responsible Mining* (the “IRMA Mining Standard” or “Standard”) contains the metrics against which mines in the IRMA system are measured.³

The IRMA Mining Standard is designed to support the achievement of four overarching principles outlined below. Additionally, each chapter of the Standard has an objective that meets one or more of these principles. For organizational purposes, chapters are listed under one core principle. However, most chapters and their objectives are relevant to more than one principle.

Principle 1—Business Integrity

INTENT: Operating companies conduct business in a transparent manner that complies with applicable host country and international laws, respects human rights and builds trust and credibility with workers, communities and stakeholders.

- **Chapter 1.1—Legal Compliance:** To support the application of the laws and regulations of the country in which mining takes place or exceed host country laws in a manner consistent with best practice.
- **Chapter 1.2—Community and Stakeholder Engagement:** To support mining company decision-making and enable communities and stakeholders to participate in mining-related decisions that affect their health, well-being, safety, livelihoods, futures and the environment.

¹ IRMA is not applicable to the mining of energy fuels, including oil, gas, uranium and thermal coal.

² For more information on IRMA's Board of Directors and governance model, visit the IRMA website: <https://responsiblemining.net/about/governance/>

³ Downloaded the Standard from the IRMA website. <https://responsiblemining.net/resources/#resources-standard>

- **Chapter 1.3—Human Rights Due Diligence:** To respect human rights, and identify, prevent, mitigate and remedy infringements of human rights.
- **Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy:** To provide accessible and effective means for affected communities and individuals to raise and resolve mine-related complaints and grievances at the mine operational level, while not limiting their ability to seek remedy through other mechanisms.
- **Chapter 1.5—Revenue and Payments Transparency:** To increase transparency of mining related payments and provide communities and the general public with the information they need to understand and assess the fairness of financial arrangements related to mining operations.

Principle 2—Planning and Managing for Positive Legacies

INTENT: Operating companies engage with stakeholders from the early planning stages and throughout the mine life cycle to ensure that mining projects are planned and managed to deliver positive economic, social and environmental legacies for companies, workers and communities.

- **Chapter 2.1—Environmental and Social Impact Assessment and Management:** To proactively anticipate and assess environmental and social impacts; manage them in accordance with the mitigation hierarchy; and monitor and adapt environmental and social management systems in a manner that protects affected communities, workers and the environment throughout the entire mine life cycle.
- **Chapter 2.2—Free, Prior and Informed Consent (FPIC):** To demonstrate respect for the rights, dignity, aspirations, culture, and livelihoods of indigenous peoples, participate in ongoing dialogue and engagement and collaborate to minimize impacts and create benefits for indigenous peoples, thereby creating conditions that allow for indigenous peoples' free, prior and informed consent and decision-making regarding mining development.
- **Chapter 2.3—Obtaining Community Support and Delivering Benefits:** To obtain and maintain credible broad support from affected communities and produce tangible and equitable benefits that are in alignment with community needs and aspirations and are sustainable over the long term.
- **Chapter 2.4—Resettlement:** To avoid involuntary resettlement, and when that is not possible, equitably compensate affected persons and improve the livelihoods and living standards of displaced persons.
- **Chapter 2.5—Emergency Preparedness and Response:** To plan for and be prepared to respond effectively to industrial emergency situations that may affect offsite resources or communities, and to minimize the likelihood of accidents, loss of life, injuries, and damage to property, environment, health and social well-being.
- **Chapter 2.6—Planning and Financing Reclamation and Closure:** To protect long-term environmental and social values and ensure that the costs of site reclamation and closure are not borne by affected communities or the wider public.

Principle 3—Social Responsibility

INTENT: Operating companies engage with workers, stakeholders and rights holders to maintain or enhance the health, safety, cultural values, quality of life and livelihoods of workers and communities.

- **Chapter 3.1—Fair Labor and Terms of Work:** To maintain or enhance the social and economic well-being of mine workers and respect internationally recognized workers' rights.
- **Chapter 3.2—Occupational Health and Safety:** To identify and avoid or mitigate occupational health and safety hazards, maintain working environments that protect workers' health and working capacity, and promote workplace safety and health.

- **Chapter 3.3—Community Health and Safety:** To protect and improve the health and safety of individuals, families, and communities affected by mining projects.
- **Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas:** To prevent contribution to conflict or the perpetration of serious human rights abuses in conflict-affected or high-risk areas.
- **Chapter 3.5—Security Arrangements:** To manage security in a manner that protects mining operations and products without infringing on human rights.
- **Chapter 3.6—Artisanal and Small-Scale Mining:** To avoid conflict and, where possible within the scope of national law, foster positive relationships between large-scale mines and artisanal and small-scale mining (ASM) entities, and support the development of ASM that provides positive livelihood opportunities and is protective of human rights, health, safety and the environment.
- **Chapter 3.7—Cultural Heritage:** To protect and respect the cultural heritage of communities and indigenous peoples.

Principle 4—Environmental Responsibility

INTENT: Operating companies engage with stakeholders to ensure that mining is planned and carried out in a manner that maintains or enhances environmental values and avoids or minimizes impacts to the environment and communities.

- **Chapter 4.1—Waste and Materials Management:** To eliminate off-site contamination, minimize short- and long-term risks to the health and safety of communities and the environment, and protect future land and water uses.
- **Chapter 4.2—Water Management:** To manage water resources in a manner that strives to protect current and future uses of water.
- **Chapter 4.3—Air Quality:** To protect human health and the environment from airborne contaminants.
- **Chapter 4.4—Noise and Vibration:** To preserve the health and well-being of nearby noise receptors and the amenity of properties and community values, and to protect offset structures from vibration impacts.
- **Chapter 4.5—Greenhouse Gas Emissions:** To minimize climate change impacts through increased energy efficiency, reduced energy consumption and reduced emissions of greenhouse gases.
- **Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas:** To protect biodiversity, maintain the benefits of ecosystem services and respect the values being safeguarded in protected areas.
- **Chapter 4.7—Cyanide:** To protect human health and the environment through the responsible management of cyanide.
- **Chapter 4.8—Mercury Management:** To protect human health and the environment through the responsible management of mercury.

Introduction to IRMA Certification / Verification

What mines are eligible for IRMA certification?

Types of Mines: The IRMA Mining Standard is applicable to all types of industrial- or large-scale mining (including surface, sub-surface, and solution mining), and all mined materials (e.g., minerals, metals) with the exception of energy fuels. Operations involved in the extraction of energy fuels may, of course, use the IRMA Mining Standard as a benchmark for performance, but IRMA does not certify oil, gas, uranium, or thermal coal operations.

Size of Mine: There is no defined minimum cut-off point for the scale of mine that can apply for IRMA certification. The IRMA Mining Standard, however, wasn't specifically designed to be applicable to artisanal or small-scale mining (ASM). Consequently, IRMA does not certify ASM operations. However, IRMA is committed to collaboration with other standards systems focused on ASM that address improved practices and greater protection of environmental and social values.⁴

What is included in the scope of an IRMA assessment and certificate?

An IRMA certificate or verified statement of achievement applies to a single mine site. If mines are interested in an exception to the standard audit scope, they will be required to submit a formal, written request to the IRMA Secretariat (for more information, see [Step 2](#)).

- **Mining-related activities included in scope:** The IRMA Mining Standard covers mining and related activities including preliminary ore processing that occurs on the mine site. Currently, the Standard also applies to mining related activities such as refining, smelting and additional processing if those facilities are co-located with the mine (i.e., are located within the mining concession/lease area or are immediately adjacent to the mine site). If mineral processing activities take place at stand-alone facilities distant from the mining activities, those facilities will not be assessed using the *Standard for Responsible Mining*. IRMA is in the process of creating a standard that will apply to these facilities, and interested companies are encouraged to contact IRMA to find out about that certification process. (info@responsiblemining.net)
- **Associated operations or facilities included in scope:** In limited cases the Standard refers to infrastructure, such as transportation routes, or associated facilities located off the mine site (e.g., resettlement requirements apply even if displacement occurs only in relation to a facility not located with the mining concession area, if that facility would not have been built except for the development of the mine).⁵
- **Mining phases included in scope:** The IRMA *Standard for Responsible Mining* includes requirements that pertain to different phases of the mine life cycle; however, the Standard was designed to be applied to operating mines.⁶ Projects in exploration or development will not be assessed against the Mining Standard. IRMA is in the process of developing an "IRMA Ready" Standard that will apply to pre-operational phases such as exploration and development, and mining projects in those phases are encouraged to contact IRMA to find out about that certification process. (info@responsiblemining.net)

⁴ The IRMA Mining Standard also contains a chapter that aims to reduce conflict and foster positive relationships between large-scale mines and ASM entities, and produce positive livelihood, environmental and social outcomes for ASM when operating in close proximity to large-scale mines in the IRMA system (Chapter 3.6).

⁵ For example, if off-site housing for mine workers or a transport route for moving ore or concentrate to market lead to the physical or economic displacement of people, then the requirements in Chapter 2.4 apply.

⁶ There are a very small number of requirements that mention exploration, and numerous requirements related to reclamation and closure. These can be found in Chapter 2.6-Planning and Financing Reclamation and Closure.

- **Contractors/subcontractors included in scope:** Compliance with IRMA Mining Standard requirements extends to others working on the mining project. For example, as required in Chapter 1.1—Legal Compliance, the operating company is responsible for ensuring that when work related to the mining project is implemented by contractors or subcontractors, those entities operate in a manner that is consistent with the Standard’s requirements. As part of verification activities, auditors may include a sample of contractors in interviews.
- **Some supply chain activities included in scope:** The *Standard for Responsible Mining* does not apply to the manufacturing and assembly of products, or end product use and disposal. There are, however, a limited number of IRMA Mining Standard requirements that outline expectations for mines to carry out due diligence related to supply chain actors.⁷
- **Corporate certification out of scope:** Mining companies cannot be IRMA certified, but a corporate entity can put all of the mines in its portfolio into the IRMA system and make public statements about doing so.

Does IRMA apply to new mines as well as existing mines?

IRMA assessments can be carried out at new mines (which are mines that became operational after the date that the IRMA Certification system became operational, i.e., September 2019) and existing mines.

IRMA acknowledges that there are some requirements that cannot be met once a mining operation has reached a certain stage—in other words, an operator cannot go back in time to meet requirements that apply to specific mining phases. Consequently, in several chapters in the *Standard for Responsible Mining*, readers will notice that the Scope of Application section has information on “New versus Existing Mines.” Where present, that section clarifies how IRMA expects existing mines to demonstrate that they still meet the intent of the social and environmental objectives of the chapter.

How expensive is an IRMA audit?

Audit costs include fees paid by the mine to the certification body (see [Step 4](#)) and a minimal fee paid to IRMA to support its operation and further development of the system (see [Step 3](#)).

Depending on a range of factors (e.g., geography, location, scope of applicable chapters, mine type, complexity of the operation, etc.) the initial certification audit is likely to cost between USD 80,000 – USD 150,000, which is on par with similar certification systems. However, as per [Step 11](#), mines may choose to undertake some corrective actions as part of the initial certification audit. If mines choose to do so, there will be additional costs involved, as auditors will need to verify that corrective actions have been implemented.

As mentioned above, the scope of the audit (number of applicable chapters and requirements) affects audit cost. Mine site assessments typically include all relevant IRMA Mining Standard chapters and requirements. However, mines can choose to not have certain chapters or requirements audited to reduce audit costs. For example, if a mine knows it does not meet certain requirements it can request that auditors skip those requirements. Any requirements or chapters not audited, however, will lead to a score of zero on that requirement/chapter. (See [Annex C](#))

Mining companies can also decrease costs by preparing thoroughly for the audit, thus reducing the number of days an auditing firm is directly engaged. IRMA helps companies prepare for the audit through the IRMA self-assessment tool, as well as through trainings and technical support.

Costs for surveillance audits should be considerably lower due to a smaller scope of review (see [Step 14](#)), and reduced number of auditors days on site (if required at all). Similarly, even though

⁷ For example, specific requirements in Chapter 1.3-Human Rights Due Diligence and Chapter 3.1-Fair Labor and Terms of Work.

recertification audits include the full scope of chapters, it is likely that costs will be lower than initial audits because some documentation will already be in the Mine Measure system. This older information will have already been reviewed by auditors, so the audit team may be able to do a more cursory review of the older information and focused more on reviewing any changes to systems and more recent monitoring and other relevant data.

What is IRMA certification, and how difficult is it to achieve?

Engaging in IRMA is not difficult in and of itself. It is a decision to commit to be assessed against the most rigorous requirements for responsible mining currently available.

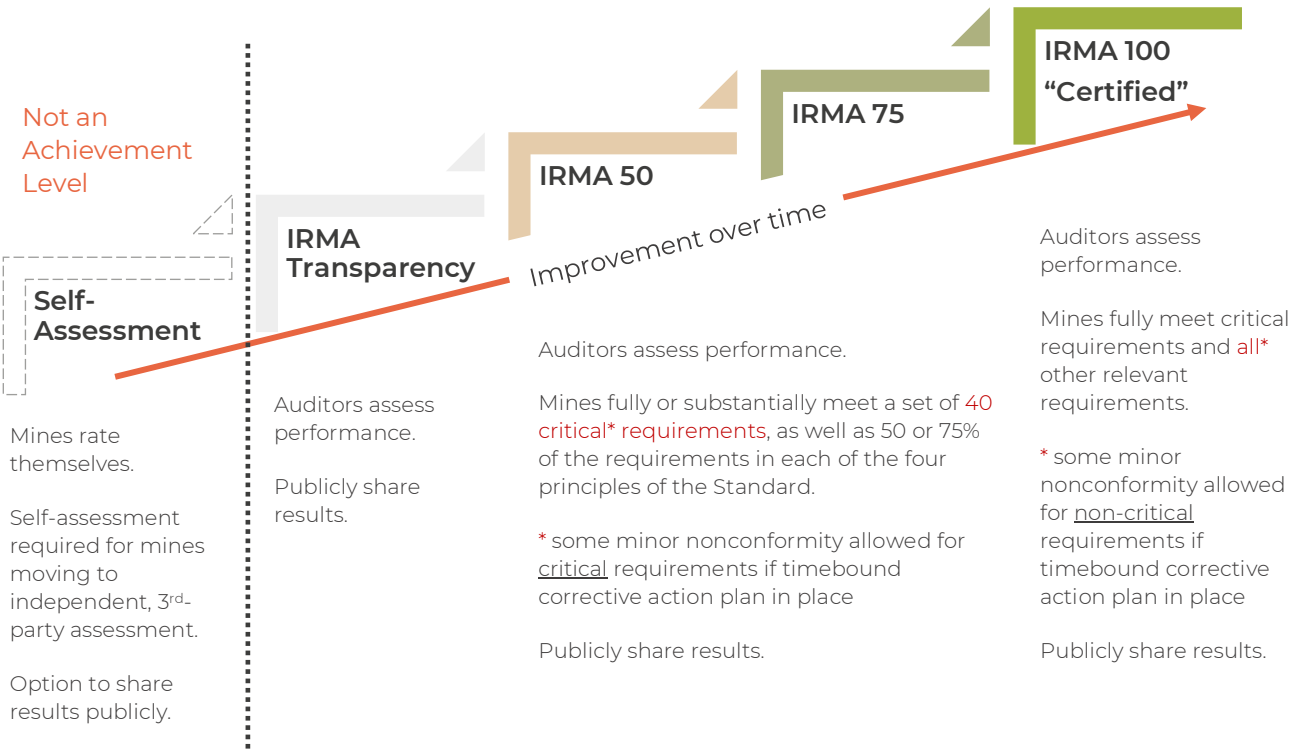
IRMA leaders recognize that in the past there may not have been incentives for mines to go beyond host country laws, and that some mines may currently have unique circumstances that pose particular challenges to implementing certain best practices.

Rather than only rewarding the small group of mines that are already achieving best practices, IRMA leaders have developed a system to also recognize lower tiers of achievement to encourage more mines to enter the IRMA system and gain some market benefits. The decision to give each mine a score—rather than taking a pass-fail approach—was deliberate, as scoring allows a mine to demonstrate current performance and then show progress toward meeting IRMA’s comprehensive set of best practices over time.

Requirements for Certification and Verified Achievement Levels

Four levels of achievement are recognized within the IRMA system. (See [Annex A](#) for more details.)

Figure 1. IRMA Achievement Levels



IRMA 100 is an enormous achievement, given that no other standard, policy, or guidance system requires the level of detail or rigor required by IRMA. Reaching **IRMA 50** or **IRMA 75** also represents a significant accomplishment, given the depth and breadth of issues assessed. **IRMA Transparency**, which involves being audited and sharing results publicly, is an achievement level as well. The

engagement of stakeholders in the IRMA assurance process, and the publication of audit results provide more reliable and accessible information that previously available about a mine's performance. Transparency provides a starting point for more authentic conversations between mines and stakeholders and can help prioritize areas for improvement.

What are “Critical Requirements” in the IRMA Mining Standard?

A total of 40 requirements have been identified by the IRMA Board of Directors as being critical requirements that any mine site claiming to follow good mining practices should meet. [Annex B](#) contains the list of critical requirements. Not all critical requirements will be relevant at all mine sites. For example, if there was no resettlement, or if a mine is not located in conflict-affected or high-risk areas, those critical requirements will not be evaluated or included in the mine's score.

As seen in [Figure 1](#) above, certified mines must fully meet all relevant critical requirements, and mines achieving IRMA 50 or IRMA 75 must at least substantially meet critical requirements and develop corrective action plans to fully meet them within specified time frames (see [Step 10](#)).

Is IRMA addressing barriers to certification?

IRMA leaders understand that smaller companies and mines producing lower value commodities may have fewer resources to spend on planning, monitoring, reporting and other formal processes than larger companies or mines producing higher value minerals and metals. IRMA is also aware that mines operating in certain challenging contexts (e.g., fragile states or in regions experiencing conflict or geopolitical instability) may not have been exposed to the supporting regulatory structures that can incentivize strong environmental and social practices.

IRMA desires to create a certification system that is accessible to all mines wishing to demonstrate their commitment to greater social and environmental performance. As a result, IRMA is evaluating potential barriers to participation and is considering ways to reduce barriers while still maintaining a Standard that is protective of social and environmental values. Possible strategies being considered include adjusted fees for participation in IRMA, longer timelines to accomplish some tasks, and pilot projects and technical and financial resources to support capacity building and training opportunities for mines.

Where does IRMA publish audit results?

Audit results are published on the IRMA website, with a dedicated page for each mine engaged in an IRMA assessment.⁸ Results are also published on the IRMA Engagement Map, a platform that allows all IRMA stakeholder sectors to share their interest in responsible mining.⁹ (See [Step 12](#))

What if mines or stakeholders disagree with audit findings?

During audits, mine site staff can review draft audit reports before they are finalized and made public. This provides them with the opportunity to point out factual errors that may have led to an inappropriate rating or score.

After the audit report has been finalized and a summary of the report has been released publicly, both mines that have been assessed and stakeholders of the mine have the opportunity to file

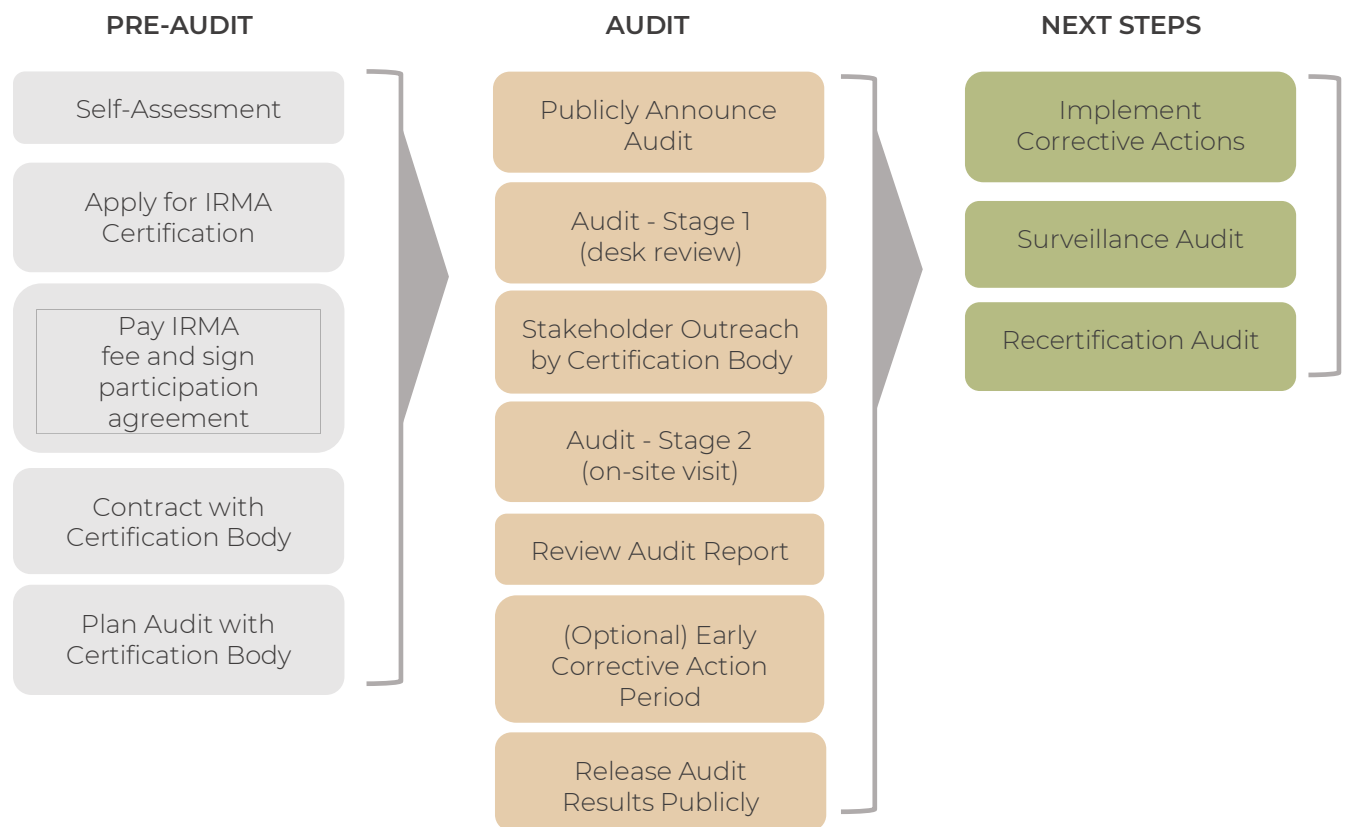
⁸ IRMA website: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/>

⁹ IRMA Engagement Map site: <https://map.responsiblemining.net/>

complaints related to the mine site assessment, ratings, scores or any information contained in the audit report. For more information on the complaints process, see [Annex E](#).

Independent Third-Party Assessment Process

Independent, third-party assessment is a process by which mines are assessed against the IRMA Mining Standard by external auditors who are neither mining company employees nor employed by IRMA. The typical process followed by mines is as follows (click on a topic in the flow chart to jump to the corresponding section):



	Step in Process	Timeline
Pre-Audit	Self-Assessment	—
	Apply for IRMA certification	IRMA typically responds within 5 days of application
	Pay IRMA fee, sign agreement	Prior to commencement of audit
	Contract with Certification Body (CB)	—
	Plan audit with CB	—
Audit	Publicly announce audit	—
	Audit Stage 1 - desk review	Optional: Mines take up to 12 months to make improvements
	Stakeholder outreach by CB	At least 30 days prior to Stage 2
	Audit Stage 2 - on-site visit	Within 12 months of Stage 1 closing meeting.
	Review audit report	Mines have 30 days to review draft for factual errors
	Optional: Early corrective action period	Corrective actions must be verified within 12 months
	Release audit results publicly	Within 15 days of finalization of audit report
Next	Implement corrective actions	As necessary, between audits
	Surveillance audit	12 to 18 months from public release of audit report
	Recertification audit	3 years from public release of audit report

Step 1. Self-Assessment

Self-Assessment using the Mine Measure on-line tool is mandatory for mines that plan to undergo independent, third-party assessment. There is a USD 2,500 fee for use of the IRMA Mine Measure tool, however, in 2021 all mining companies are granted one free use of the tool.

IRMA's early-phase learning has demonstrated that use of the self-assessment tool helps to identify issues that may require work prior to an audit, and helps the mine organize its information and evidence prior to the audit. Without this up-front work mines will not be sufficiently prepared for audits, and the desk review undertaken by the auditors will be much longer and more costly.

To expedite the auditors' desk review of a mine's information (see [Step 7](#), below) mines should endeavor to fill in the self-assessment as accurately and thoroughly as possible, by providing a rationale for each rating and uploading supporting evidence (with specific pages numbers or other instructions for where the relevant information can be found).

Currently, the on-line Mine Measure tool is available in English and Portuguese. Other languages may be added in the future.

Mining companies may use their preferred language when providing information (responses or evidence) in the tool. It is important to bear in mind, however, that when a mine moves on to third-party, independent assessment the company will need to discuss and agree on the primary language of correspondence with the certification body and audit team. It is possible that not all audit team members will be fluent in the mining company's preferred language, and in such cases arrangements for covering translation costs will need to be negotiated.

IMPORTANT TIMELINES: There is no set timeline for this step.

FOR MORE INFORMATION: Apply for a self-assessment account: self-assess@responsiblemining.net

Mine Measure Instruction Manual (in English, Spanish and Portuguese) available on the IRMA website.¹⁰

Achievement level calculator (an Excel spreadsheet) to determine potential achievement level based on self-assessment is available upon request: self-assess@responsiblemining.net

Step 2. Submit Mine Site Assessment Application Form to IRMA

This step may be carried out concurrently with self-assessment.

The application process informs IRMA that a mine site is interested in independent, third-party assessment. The Mine Site Assessment Application form includes:

- Details about the mine site and operation
- Information to help estimate the time required to carry out the audit, such as the chapters relevant at the site, the scope of requirements to be audited, and the achievement level being pursued by the mine
- Contact information for mine site personnel responsible for the audit

¹⁰ Resources for Mines > Self-Assessment: <https://responsiblemining.net/resources/#resources-mines>

Variations in Audit Scope

- Some mining operations are more complex than others. In some cases, there may be several mines run by the same company that are accessing a single ore body, more than one mine that feeds a single concentrator, or other scenarios that would make it more efficient to combine several mine sites and operations in one audit. Additionally, there are some sites where mining operations are integrated with smelting and further processing activities, making it difficult to separate the potential impacts of the various facilities/activities, and creating a situation where the cumulative impacts of all activities become important to consider and assess.
- IRMA is willing to explore expansions to audit scope, or phasing of audits over time to cover all facilities associated with large, complex or integrated mining operations. What is most important is that the full range of mining-related activities and potential impacts related to mining activities be assessed, that audits are transparent about what has been included, and that the information publicly reported be comprehensive and provide site-specific details on issues of concern.

If a mining company wishes to request a variation in audit scope, it should contact the IRMA Secretariat or include a letter with its application outlining the requested variation.

IMPORTANT TIMELINES: IRMA reviews applications for completeness and strives to respond to applicants within 5 business days of receipt.

If variations in audit scope are being requested, this timeline will be longer.

FOR MORE INFORMATION: Download the Mine Site Assessment Application form¹¹ or contact the IRMA Secretariat: info@responsiblemining.net.

Email completed forms to the IRMA Secretariat at: info@responsiblemining.net.

Step 3. Pay IRMA fee and agree to participation terms

A certification fee must be paid to IRMA by all mine sites that undergo independent, third-party assessment in the IRMA system. The fee, which varies based on annual mine site revenue, supports the operations and development of the IRMA system. It is an annual fee, but mines may pay for three years and receive a 5% discount. In exceptional cases, fee reductions or waivers are possible.

Along with the fee, mines will be required to sign a participation agreement with IRMA.

IMPORTANT TIMELINES: IRMA will invoice for the fee and require mines to sign participation agreement after mine site applications are approved for completeness.

FOR MORE INFORMATION: Download the IRMA Certification Fee Policy,¹² or contact the IRMA Secretariat: info@responsiblemining.net.

¹¹ IRMA website > Resources for Mines > Independent 3rd-Party Assessment: <https://responsiblemining.net/resources/#resources-mines>

¹² IRMA website > Resources for Mines > Independent 3rd-Party Assessment: <https://responsiblemining.net/resources/#resources-mines>

Step 4. Contract with certification body

A mine contracts directly with a certification body (CB) to carry out third-party, independent mine site assessments. Agreements or contracts signed between the two entities will include issues such as payment terms (amounts, timing, contingencies) and other issues agreed by the CB and mine.

From IRMA's perspective, agreements/contracts must contain (or must not prohibit):

- Permissions for the audit team and select members of the IRMA Secretariat (unless otherwise specified, this would be the Director of Standards and Assurance) to review documentation and records and have access to relevant facilities, equipment, location(s), area(s), personnel, and mine subcontractors. The mine may request that IRMA representatives sign confidentiality or non-disclosure agreements.
- Agreement that the mine will use only approved communications, claims and trust marks related to IRMA certification or verification of achievement levels.
- Agreement to allow a summary of audit results to be published by IRMA.

Currently, there are two CBs approved by IRMA to carry out audits and issue certificates and verified statements of achievement based on the findings from mine site assessments. It is possible that more firms may be approved to carry out assessment activities later in 2022 or beyond. Approved certification bodies including contact information can be found on the IRMA website at <https://responsiblemining.net/resources/#independent-3rd-party-assessment>.

All firms that work with IRMA are required to meet IRMA's Requirements for Certification Bodies, which include organizational requirements, auditor competencies, and rules for IRMA audits.

IMPORTANT TIMELINES: There is no set timeline for this step.

FOR MORE INFORMATION: See Section 4.1 of IRMA's Certification Body Requirements.¹³

Download IRMA's Communications and Claims Policy.¹⁴

[Annex F](#) has information on how to file a complaint related to a certification body or a particular mine site assessment.

Step 5. Plan audit with certification body

Audit planning is a collaborative, interactive process between a certification body's (CB) audit team and a mine. It involves discussions about the assessment process, scope of audit, access to information and facilities, interpretation and translation needs (if required), protection of confidential information, and other relevant issues. The process culminates in the signing of a contract between the mine and CB for assessment services.

A typical process will start with the audit team review of the Mine Site Assessment Application form, and then the mine and audit team (or lead auditor) will have discussion(s) on proposed scope of the audit, audit plan, estimated costs and proposed timeline for audit Stages 1 and 2.

Determine Audit Scope

As mentioned in [Step 2](#), IRMA is open to considering variations related to audit scope. The mine's application form provides a first opportunity for mines to identify whether they wish to limit or

¹³ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

¹⁴ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

expand the audit scope. Mines may also adjust the audit scope based on discussions with the audit team during the audit planning process. There are two ways the audit scope can be narrowed:

- First, any chapters of the IRMA Mining Standard that are not applicable at the mine site can be marked as “not relevant” on the application form. An applicant must provide a credible, supported rationale. For example, if a mine claims that the mercury chapter is not relevant, the company can provide sufficient evidence to show that mercury is not contained in any material that will undergo thermal processing at the site.
- Second, when establishing audit scope, mines that know they will not reach full certification (i.e., IRMA 100) may opt to limit the scope of the assessment to the number of requirements that they believe will allow them to reach a lower achievement level (e.g., IRMA 75 or IRMA 50). The scope, however, must include all critical requirements (see [Annex B](#)). This allowance is being made to help reduce the costs of an audit for those mines that know they are not yet at the highest achievement level. If the scope of an audit has been narrowed at the request of the mine, the public summary of the audit will clearly list the requirements that were not assessed.

IMPORTANT TIMELINES: There is no set timeline for this step.

FOR MORE INFORMATION: IRMA’s Certification Body Requirements contain more details on planning audits (Section 9.2).¹⁵

Step 6. Publicly announce commencement of assessment

IRMA publishes notices for all independent, third-party assessments, so that stakeholders are aware of the audit and have the opportunity to participate in the assessment process. This information is shared publicly by IRMA, typically on the IRMA website and may include other outreach methods.

A mine is welcome to publish press releases or announce assessment audits on its website or in other materials. Any announcements must adhere to IRMA’s Communications and Claims Policy.

IMPORTANT TIMELINES: Announcement occurs when assessments commence.

FOR MORE INFORMATION: IRMA’s Communications and Claims Policy.¹⁶

Step 7. Audit Stage 1 – desk review

Stage 1 of the audit is typically carried out remotely, and includes the following:

Opening meeting: Mines and auditors discuss IRMA and certification body requirements, review audit scope and audit plan, discuss confidentiality, public summary of audit results, conformance evaluation methods, and management of nonconformities and corrective actions.

Provision of evidence: Mine provides auditors with documentary evidence to demonstrate conformance with the IRMA requirements. The initial data transfer will occur through the IRMA Mine Measure self-assessment tool (see [Step 1](#)). When ready, a mine provides auditors with permission to access the information entered in the tool.

- The more information that can be provided during Stage 1 (e.g., narrative explanations of how the mine is meeting the requirements, references to page numbers in documents),

¹⁵ Available from IRMA’s website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

¹⁶ Available from IRMA’s website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

the less time auditors will need to spend reviewing the documentation, which will help reduce the time needed to carry out the desktop audit.

- Mines may withhold information they believe is too sensitive or confidential to share electronically. This material can be reviewed when auditors are on-site during Stage 2.

Auditor review of materials: Auditors review the mine's self-assessment and use the Mine Measure tool to document their own initial ratings of the mine's performance. Auditors identify areas where additional information or clarification on certain issues is needed. Auditors then contact mine staff to follow-up and, if necessary, obtain more information.

Closing meeting: Review findings from Stage 1 of the audit, highlight any areas and potential nonconformities the mine may want to address prior to the Stage 2 of the audit, review the audit plan for Stage 2, and determine if any adjustment to the audit schedule is needed.

IMPORTANT TIMELINES: There is no set timeline for this step. The length of time required to carry out Stage 1 will vary from mine to mine. The mine and CB, however, may want to agree on a general timeframe for completion of Stage 1 review.

FOR MORE INFORMATION: See Section 9.3 of IRMA's Certification Body Requirements.¹⁷

Step 8. Stakeholder outreach by certification body

This may be done concurrently with Steps 6 or 7. As mentioned in [Step 6](#), IRMA publicly announces the commencement of each independent, third-party assessment. Additionally, the CB and IRMA publicly announce the planned dates for on-site audits to inform and invite stakeholders to participate. This includes online announcement as well as appropriate, local announcement to maximize communication to relevant stakeholders.

Audit teams are required to conduct outreach to potential stakeholders prior to their onsite audits. The purpose of this outreach is to solicit input from affected and interested parties regarding the mine's environmental and social management and performance as it relates to the requirements in the IRMA Mining Standard. Input may be received in writing, via electronic communications, or through phone interviews. Also, during the onsite visit audit teams will carry out in-person interviews with interested stakeholders. Stakeholders who engage in IRMA audits are not identified by name in any publicly available materials.

Audits always include interviews with mine workers, and if present, mine contractors and workers' organizations such as trade unions. Other stakeholder groups that should be consulted during audits include:

- rights holders such as indigenous peoples, property owners and water rights holders
- leaders and affected community members, including, artisanal and small-scale miners
- local, regional, and national civil society organizations that have an interest in environmental, social, economic, revenue transparency, community development, health and other issues that may intersect with the mining operation
- local, state, and federal regulatory agency personnel
- other relevant groups identified by the certification body

The mine may assist the audit team by providing a list of stakeholders. Audit teams will also carry out their own research to determine other stakeholders who should be consulted in the audit.

¹⁷ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

IMPORTANT TIMELINES: Outreach and posting of Stage 2 announcement must occur at least 30 days before Stage 2 commences.

FOR MORE INFORMATION: Sections 9.2, 9.3, 9.4 and 9.10 of IRMA's CB Requirements.¹⁸

Step 9. Audit Stage 2 – on-site visit

Stage 2 of an audit consists of the following:

Opening meeting: Introductions, review of audit scope and onsite audit plan, updates from the mine on activities since completion of Stage 1 of the audit, review of conformance evaluation methods, review of how major and minor nonconformities and corrective actions are managed, and onsite emergency and security procedures for the audit team.

Observations: Auditors tour mine site facilities and any relevant off-site locations to obtain observational evidence.

Interviews: Auditors conduct interviews, as necessary, to obtain additional information. Interviews may be conducted one-on-one, or with groups where appropriate considering the potential need to protect identities of stakeholders and create a safe and open environment for candid sharing. Interviews include the following:

- Mine management and relevant departmental staff.
- Workers and workers' representatives. (These may be done on site or off site. Mine management cannot be present.)
- Stakeholders – see [Step 8](#). (These may be done on site or off site. Mine management cannot be present, and stakeholders may request other limitations and protections.)

Review of documentary evidence: Auditors review any relevant documents or data not provided by the mine during the Stage 1 desk review.

Closing meeting: Discuss, in a general manner, preliminary findings (potential nonconformities and observations) and next steps.

IMPORTANT TIMELINES: Stage 2 must take place within 12 months of the Stage 1 closing meeting. Time spent on-site will be determined through discussions between the mine and audit team.

FOR MORE INFORMATION: See Sections 9.3 and 9.4 of IRMA's Certification Body requirements.¹⁹

Step 10. Review audit results and develop corrective actions

Within 30 days of the Stage 2 closing meeting, a draft audit report is developed by the audit team and reviewed by the certification body (CB) before being sent to the operating company for review.

The draft report contains information on the mine, lists of interviews conducted by auditors, ratings on each requirement and a narrative from auditors to support their findings, scores for each chapter and the four principles in the IRMA Mining Standard (Business Integrity, Positive Legacies, Social Responsibility and Environmental Responsibility). It will also include any proposed achievement level (i.e., IRMA 100, 75 or 50 or IRMA Transparency) based on the audit results.

¹⁸ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

¹⁹ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

The operating company will have 30 days to point out errors of fact. Additionally:

- If a mine is seeking full certification (IRMA 100), the company must also draft a corrective action plan to address all minor nonconformities with non-critical requirements (mines cannot achieve IRMA 100 with any major nonconformities).
- If a mine is seeking IRMA 50 or IRMA 75, the company must draft a corrective action plan for critical requirements that were not fully met.
- If a mine is seeking IRMA Transparency, no corrective action plan is required.

During this period, the mine also decides if it would like to take up to 12 months to make some corrective actions before a certification decision is made and audit results are publicly released. This may be especially attractive to mines that are on the cusp of reaching IRMA 50, IRMA 75 or IRMA 100.

- **If a mine decides to use the corrective action period** – [go to Step 11](#).
- **If a mine decides not to use the corrective action period** – then upon receipt of the mine's comments the CB has 15 days to make revisions to the draft audit, finalize scores and make a decision on the appropriate achievement level.

The revised draft report is then sent to the IRMA Director of Standards and Assurance for a 15-day review. This review is conducted to ensure the audit report is complete prior to public release, and it is also part of IRMA's oversight of its CBs.²⁰ The report is returned to the CB, which then has 7 days to finalize the report.

IMPORTANT TIMELINES: The audit team/CB has 30 days from closing meeting to prepare, review and send draft audit report to the mine.

The mine then has 30 days to review report and suggest corrective actions. Extensions may be requested²¹ — contact the IRMA Secretariat info@responsiblemining.net

The CB then has 15 days to make revisions.

IRMA's Director of Standards and Assurance then has 15 days to review.

Report is finalized by CB within 7 days of receipt of feedback from IRMA's Director of Standards and Assurance.

FOR MORE INFORMATION: See Sections 9.2, Table 2 of IRMA's Certification Body requirements.²²

Step 11. (Optional) Early corrective action period

A mine may postpone release of its initial audit results for up to 12 months while it implements corrective actions.

The most likely reason that a mine will take advantage of this early corrective action period is if the mine has a major nonconformity with one or more critical requirements (i.e., partially meets or does not meet them), but otherwise has scored well enough on the IRMA requirements to meet IRMA 50 or a higher achievement level. Mines can take up to 12 months to make necessary changes to bring ratings on critical requirements up to the substantially or fully meets level, thus

²⁰ At the present time, IRMA conducts oversight of the competency of its Certification Bodies. Reviewing audit reports provides insight into how well the auditors follow IRMA requirements, and the rigor, completeness and soundness of their assessments.

²¹ Extensions may be granted. IRMA is still a new system and recognizes that this period may take longer than anticipated because auditors, CBs and mines are still developing familiarity with the IRMA Standard and system.

²² Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

enabling them to receive a higher IRMA achievement level. If mines have made improvements to other requirements during this time, they may request that auditors also assess those requirements and determine if a higher rating is warranted.

Depending on the nature of the nonconformity and the particular requirements in question, auditors may or may not need to visit the site to carry out their assessment.

If mines opt to use this 12-month corrective action period, it is important to realize that any improvements or changes must be verified by auditors within that 12-month period.

- If a mine site fails to have the changes verified during the 12-month period, the original audit report would be considered the final report, that version would go to the IRMA Director of Standards and Assurance for review, and then a summary of the report would be released publicly.
- If a mine site has changes verified during the 12-month period, the auditors will revise the audit report accordingly, and relevant parts of [Step 10](#) will be followed again (i.e., mines will have up to 30 days to review the changes, the CB revises the report, IRMA's Director of Standard and Assurance reviews the report, and the report is made public).

IMPORTANT TIMELINES: Implementation of corrective actions must be verified within 12 months of the CB's receipt of the mine's comments on the draft audit report (see [Step 10](#)).

FOR MORE INFORMATION: View critical requirements in [Annex B](#).

Step 12. Public disclosure of audit summary

A summary of the mine's final audit report will be made public on the IRMA website. If a mine has a profile on the IRMA Engagement Map it will be posted there as well.

Public summaries will include information such as scores on a principle and chapter basis, and a section on Areas for Improvement that includes requirements that received "substantially meets," "partially meets" and "does not meet" ratings. A company will be provided an opportunity to include information on planned corrective actions, as well as comments in its public summaries.

Following the decision on whether certification or a verified level of achievement will be awarded, the mine will receive a copy of the public summary audit report.

A mine has the option to:

- Request that confidential information be redacted prior to the summary report's public release. This is expected to be a quick review and should not exceed 5 business days.²³
- Publish its full audit report (e.g., include all auditor comments and information on corrective actions) or distribute the full report to any of its stakeholders if it so wishes.

Any communications made in relation to the public audit report and mine site achievement level must comply with IRMA's Communications and Claims Policy.

IMPORTANT TIMELINES: The company has 5 business days to review the final audit report and make requests for redaction of confidential information.

FOR MORE INFORMATION: [Annex E](#) has a sample table of contents for the audit report.

²³ There may need to be some back and forth between the auditors and mine to determine what are reasonable redactions. The purpose is not to remove information that may present a negative view of a mine's performance, but rather, information that is confidential business information, or that may pose a risk to the safety of individuals.

Visit the IRMA website to see public audit summary reports from other mines.²⁴

View mines on the IRMA Engagement Map.²⁵

Read IRMA's Communications and Claims Policy.²⁶

Step 13. Implement corrective actions

As outlined in [Step 10](#), some mines will have been required to develop a corrective action plan.

- For mines at the IRMA 100 level, corrective action plans are required to address all minor nonconformities with non-critical requirements (mines cannot achieve IRMA 100 with major nonconformities).
- For mines at the IRMA 50 or IRMA 75 level corrective action plans must be developed for critical requirements with minor nonconformities (mines cannot achieve IRMA 50 or 75 if critical requirements have major nonconformities). Implementation of corrective actions for major or minor nonconformities with non-critical requirements is option.
- If a mine is at the IRMA Transparency level, no corrective action plan is required.

To maintain an achievement level, implementation of corrective actions must occur within the timeframes indicated in Important Timelines below. If corrective actions are not successfully verified, the achievement level may be suspended (as explained in [Step 14](#)).

IMPORTANT TIMELINES: To maintain IRMA 100, minor nonconformities with non-critical requirements must be closed at the surveillance audit.

To maintain IRMA 50 or IRMA 75, minor nonconformities with critical requirements must be closed at the surveillance audit.

FOR MORE INFORMATION: See Section 9.6 of IRMA's Certification Body Requirements.²⁷
See [Annex D](#) for more information on suspensions and withdrawal of certificates/achievement levels.

Step 14. Surveillance audit

Surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the initial audit does not need to be re-established. Typically, surveillance audits involve a review of the operating company's management systems, status of compliance with host country laws, review of any changes to host country regulations (if applicable), status of conformity with IRMA critical requirements, status of progress in closing nonconformities (if applicable), and review of performance related to issues identified by the auditors, the operating company or stakeholders as being high-risk issues (i.e., those with high potential to cause significant impacts to the environment, communities or worker health and safety if not managed well).

If there have been any material changes to the mining operation or new stakeholder complaints between the initial certification audit and the surveillance audit, these must be disclosed to the CB

²⁴ IRMA website: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/>

²⁵ IRMA Engagement Map site: <https://map.responsiblemining.net/>

²⁶ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

²⁷ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

prior to the surveillance audit, as requirements affected by the changes may need to be reviewed as part of the surveillance audit.

Mines must undergo one surveillance audit during each certification cycle, and that audit must occur between 12 and 18 months after an initial or recertification audit report has been finalized and the certificate (achievement level) issued.

Corrective action plans will need to be developed (or updated) if new nonconformities are found during surveillance audits (see Tables 4 and 5 of [Annex D](#)).

Retaining achievement level

For IRMA 100 sites

Sites that have achieved IRMA 100 will retain their certification at the surveillance audit provided that the following criteria are met:

- All critical requirements are fully met.
- For non-critical requirements, no new major non-conformities are identified.
- For non-critical requirements, where minor non-conformities were previously identified, corrective actions have been executed, successful completion is confirmed by the certification body, and full conformity is confirmed.
- For non-critical requirements where new minor non-conformities are identified, a corrective action plan is prepared and approved by the certification body.

For IRMA 50 or IRMA 75 sites

Sites that have achieved IRMA 50 or IRMA 75 will retain their achievement decision at the surveillance audit provided that the following criteria are met:

- For the first surveillance audit following the initial certification audit, all critical requirements substantially or fully conform.
- For surveillance audits that occur after subsequent recertification audits, all critical requirements fully conform, unless a formal exception has been approved and progress towards full conformance is in accordance with agreed conditions.

For IRMA 50, 75 or 100 sites

In addition to the above criteria, sites will retain their achievement decision or certification, as applicable, at the surveillance audit provided that the following additional criteria are met:

- The site continues to maintain operations in compliance with government regulations.
- Site performance evaluated within the scope of the surveillance audit does not indicate that the site has persistently or seriously failed to deliver the previously identified achievement or certification level.
- Material changes to operations have been successfully accounted for in the site's management systems. Material changes include but are not limited to capital projects, site or operational expansions, changes to the produced materials, or changes in ownership. Additional criteria for material changes will be determined by the certification body.
- The site has not experienced major incidents that could impact the credibility of the IRMA standard if continued recognition of achievement is allowed.

If any of the above criteria are not met, the site is expected to resolve the nonconformity or other issue, with confirmation by the certification firm, within 3 months of delivering the draft report to the site. If adequate resolution does not occur, the certificate or achievement level will be suspended, as described in [Annex D](#).

If such a suspension occurs, a mine will be expected to remove claims of achievement or certification in communications to the public (e.g., if an achievement level is listed on a website) and customers (e.g., sales invoices). IRMA will update achievement levels on its website.

If a site wishes to have their score re-evaluated, then the limited scope surveillance assessment can be replaced with a fully scoped assessment (e.g., follows the requirements of a recertification assessment) at the mid-cycle time period. The outcome of this audit will result in new chapter and principle scores and the associated earned achievement level. Additionally, the certification cycle will be reset based on the completion of this assessment.

IMPORTANT TIMELINES: Surveillance audits occur 12 to 18 months after finalization of the initial or each subsequent recertification audit report.

Resolution of nonconformities or other issues identified in the surveillance audit that are tied to retaining certification or achievement level must be resolved within three months of issuance of the draft report to avoid suspension of certification or achievement level.

FOR MORE INFORMATION: See Section 9.6 of IRMA's Certification Body Requirements.²⁸

Achievement status of mines can be found on IRMA's website²⁹ and the IRMA Engagement Map.³⁰

Step 15. Recertification audit

Certificates and verified statements of achievement are valid for a period of three years (i.e., the certification cycle). Within 3 years (36 months) from the date that the initial audit report is finalized and the certificate (achievement level) issued, a recertification audit must be completed and new audit report published to maintain or upgrade a certificate/achievement level. Recertification audits then occur every three years (36 months) thereafter.

Recertification audits include Steps 1, 4 through 10, 12 and 13, above. During audit planning ([Step 5](#)) the scope and extent of the desktop review will be determined. For example, any changes or updates to policies, assessments, management plans, mitigation plans, monitoring results, and documentation related to changes in legal compliance, information on stakeholder engagement, and stakeholder complaints, should undergo desktop review.

IMPORTANT TIMELINES: A recertification audit must be completed within 36 months of the finalization and publication of the previous audit report.

FOR MORE INFORMATION: See Section 9.6 of IRMA's Certification Body Requirements.³¹

²⁸ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

²⁹ Information on mines in the IRMA system can be found on the IRMA website: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/>

³⁰ IRMA Engagement Map – search by mine site name or search by sector “mine sites”. <https://map.responsiblemining.net/>

³¹ Available from IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>

Annex A – Details on Basis for Certification

Basis for Certification (IRMA 100)

The highest level of achievement within the IRMA system is “certification” or IRMA 100. The basis for IRMA certification is that all critical requirements are fully met, and all other relevant requirements of the IRMA Mining Standard are fully or substantially met (i.e., there are only minor nonconformities) by the applicant mine.

The number of requirements that may have minor nonconformities is limited, and for those requirements it is expected that appropriate actions will be taken within specified timeframes to address problems and analyze issues contributing to the nonconformities so that they can be avoided in the future (See [Table 4](#)).

IRMA is allowing certification even with some level of minor nonconformity because it is recognized that occasional, temporary failures of conformity are inevitable when managing large, complex mining operations. Consequently, and in line with other comparable voluntary certification schemes, IRMA is allowing certificates to be issued despite the existence of minor nonconformities with the requirements of the IRMA Mining Standard.

Basis for Verified Achievement Levels (IRMA 50 and 75)

The basis for IRMA 50 or IRMA 75 is that mines must demonstrate that they have reached a score of 50% or 75% of the total possible score, respectively, for each of the four principles in the IRMA Mining Standard (i.e., Business Integrity, Positive Legacies, Social Responsibility and Environmental Responsibility). See [Annex C](#) for more details on the scoring system.

The rationale for calculating the score for each principle, rather than the Standard as a whole, is to ensure that mines that receive an IRMA achievement level of 50 or 75 are able to demonstrate a level of competency across each of the four primary areas of the IRMA Mining Standard.

Additionally, all critical requirements must at least be substantially met (i.e., there are only minor nonconformities), and have in place a corrective action plan to fully meet those requirements by the following surveillance or recertification audit (whichever comes first). (See [Table 5](#)).

Basis for Verified IRMA Transparency Level

The IRMA Mining Standard is a high-bar standard, and for some mines the process of working toward meeting such a comprehensive set of best practices will take more time. While the IRMA system primarily aims to recognize and reward mines that are achieving best practices in social and environmental performance, IRMA leaders also recognize the value and importance of supporting mines wherever they happen to be on their journey to improve their practices.

Within IRMA, the act of transparency is recognized as a form of leadership in and of itself, as increased transparency can lead to more meaningful engagement and dialogue with a mine’s stakeholders about particular strengths and challenges with the mining project.

The IRMA Board of Directors has therefore decided that mines not yet achieving 50% of the requirements in each of the four IRMA principles can still be recognized by IRMA by setting a baseline of performance through a third-party audit and sharing their results publicly. Mines will receive a letter from the certification body that acknowledges the scores achieved by the mine (as verified through an independent third-party audit).

Through follow-up audits these mines can demonstrate publicly that they are improving over time. These mines may decide to set a goal to achieve a certain IRMA level with a certain timeframe, but this is not required by IRMA.

Annex B – Critical Requirements

Note that there is a list of 30 elements, containing a total of 40 specific requirements, referenced in the table below.

Table 1. IRMA's Critical Requirements from the Standard for Responsible Mining

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).

Annex C – IRMA Rating and Scoring System

IRMA Rating System

All requirements under assessment will be rated on their level of conformity. The following rating system will be used, and the general criteria for differentiating between ratings are as follows:

Fully meets:

- Relevant policies, procedures, methodologies, training programs, or work plans, etc. and performance meet the requirement as written or fully meet its intent.
- Stated performance for all elements or sub-requirements is evident with extremely rare exceptions (and exceptions do not affect consistency with the objective(s) of the chapter).

Substantially meets:

- Relevant policies, procedures, methodologies, training programs, or work plans, etc. have sufficient detail or require only minor augmentation. For example:
 - o Many, but perhaps not all relevant personnel are informed of policies and procedures. Work plans are developed, and implementation is under way.
 - o Training programs are being implemented, though perhaps not fully or to maximum efficacy.
- Where requirements are performance-based, mine has implemented appropriate actions to meet the performance measure but is not fully meeting it. Some augmentation or modification required.
- Where sub-requirements exist, the majority of the sub-requirements are being met, but one or a few factors need clarification, augmentation or complete implementation.

Partially meets:

- Relevant procedures, methodologies, training programs, or work plans, etc. are under development; or policies, procedures, etc. are in place but do not have sufficient detail and need significant augmentation; or they are in place but are not being implemented or are inconsistently applied; or implementation is in early stages so difficult to gauge its effectiveness/successful implementation.
- Where requirements are performance-based, mine has taken some actions to meet the performance measure, but there is considerable additional work necessary.
- Where sub-requirements exist, the majority or all of the sub-requirements need clarification, augmentation or implementation.

Does not meet:

- Relevant policies, procedures not developed, actions have not been taken to meet performance measures, or requirements are not being met despite efforts being made by the company.

Not relevant

- Requirements are not applicable at the mine site. Mines will be expected to provide rationale for why requirements are not relevant.

Not assessed

- Mines choose to exclude certain requirements from the assessment.

IRMA Scoring System

All requirements, except for those deemed “not relevant,” will be scored. The following scoring system will be used:

Table 2. Relationship between Assessed Ratings and Scores.

Rating	Score
Fully meets	2
Substantially meets	1.5
Partially meets	1
Does not meet	0
Not assessed	0

As mentioned above, mines may opt to exclude requirements from an assessment in order to reduce audit costs, e.g., when they know for sure that they are not meeting the requirement. Mines should be aware, however, that all relevant requirements factor into the score for a particular chapter.

Consequently, if a mine chooses to not have a relevant requirement assessed it will receive a score of zero (0) for that requirement (because if a requirement is not assessed there is no evidence that the mine is partially, substantially or fully meeting the requirement).

Table 3. How Major and Minor Nonconformities Relate to Ratings and Scores.

Fully meets	Substantially Meets	Partially meets	Does not meet
No nonconformity with the requirement.	Minor nonconformity with the requirement.	Major nonconformity with the requirement.	Major nonconformity with the requirement.

Rules for Calculating Scores

A simple method is being employed for calculating audit scores.

1. Requirements receive a score as in [Table 2](#), above:
2. Chapters are scored by:
 - Determining if the chapter is relevant at the mine site
 - Determining the maximum possible score for the chapter (= total number of relevant requirements in the chapter x 2 points if all requirements were fully met)
 - Determining the actual scores achieved by the mine for all of the relevant requirements in the chapter
 - Creating a numerical score (= total actual score achieved for a relevant chapter and requirements ÷ maximum possible score for the chapter)
 - Creating a percentage score (= total actual score achieved ÷ maximum possible score x 100)
3. Each of the four principles (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility) in the IRMA Mining Standard receive a score as follows:

- Determine the relevant chapters within that principle that apply at the mine
- Determine the maximum possible score for each relevant chapter (based on the relevant requirements within each relevant chapter)
- Determine the total maximum score for the principle (based on adding up the scores for all relevant chapters)
- Determine the total actual scores achieved in the relevant chapters of the principle
- Create a numerical score (= total actual score for all relevant chapters in the principle ÷ maximum possible score for relevant chapters in the principle)
- Create a percentage score (= total actual score achieved for all relevant chapters in the principle ÷ maximum possible score x 100)

Example of Scoring

<ul style="list-style-type: none"> Principle 2 of the IRMA Mining Standard is Planning and Managing for Positive Legacies. The 6 chapters included in that principle are: 2.1. Environmental and Social Impact Assessment and Management; 2.2. Free, Prior and Informed Consent; 2.3. Obtaining Community Support and Delivering Benefits; 2.4. Resettlement; 2.5. Emergency Preparedness and Response; 2.6. Planning and Financing Reclamation and Closure. In this example, we are assuming there was no resettlement associated with mine development, so only 5 of the 6 chapters in Principle 2 are relevant at the site. 	# of relevant chapters in Principle 2	5
<ul style="list-style-type: none"> There are 91 requirements in the 5 relevant chapters. In this example, all 91 requirements are relevant at the mine site. 	# of relevant requirements in Principle 2	91
<ul style="list-style-type: none"> According to IRMA's scoring system, when a site fully meets a requirement it scores 2 points, for substantially meeting it scores 1.5, for partially meeting it scores 1, and if the mine does not meet a requirement it scores 0. Consequently, the maximum possible score for the site, if all requirements are fully met, is: <p>91 requirements x 2 points = 182 points</p>	Total possible score for Principle 2	182
<ul style="list-style-type: none"> In this example, the mine site fully meets 45 requirements, substantially meets 18, partially meets 22 and does not meet 6 requirements. As a result, its score for the relevant chapters in Principle 2 is: <p>$(45 \times 2) + (18 \times 1.5) + (22 \times 1) + (6 \times 0) = 90 + 27 + 22 + 0 = 139$ points.</p>	# of relevant req'ts fully met # of relevant req'ts subst. met # of relevant req'ts partially met	45 18 22
<ul style="list-style-type: none"> The percentage score for Principle 2 is: <p>$\frac{\text{Total Score Achieved for Principle 2}}{\text{Total Possible Score for Principle 2}} \times 100 = \frac{139}{182} \times 100 = 76.4\%$</p>	Total score for Principle 2 % for Principle 2	139 76.4%
<ul style="list-style-type: none"> Because the mine exceeded 75% in this principle, it is eligible for IRMA 75, as long as the site also scores 75% or higher in the other three principles of the Standard, and also at least substantially meets all critical requirements. 	Eligible for IRMA 75 if scores for other principles are 75% or above and substantially meets all critical requirements.	

Annex D – Suspension or Withdrawal of Achievement

Addressing Nonconformities

If nonconformities have been identified during the audit they are noted in the draft and final audit report. Mines will have the opportunity to point out errors of fact prior to a certification decision (see [Step 10](#)), and the option to address nonconformities prior to releasing public audit report summaries (see [Step 11](#)).

There are two types of nonconformities:

- If a requirement receives a rating of “does not meet” or “partially meets” it has a **major** nonconformity.
- If a requirement is rated “substantially meets” it is considered a **minor** nonconformity.

Nonconformities are addressed in different ways depending on the status a mine is hoping to achieve:

- If a mine is seeking **Certification (IRMA 100)**, certification will not be granted if there are any major or minor nonconformities with critical requirements. Certificates may be granted if there are minor nonconformities with non-critical requirements as long as a corrective action plan in place (see [Table 4](#), below). If corrective actions are not implemented within prescribed timeframes the certificate may be suspended or withdrawn (see next section on Failure to Address Nonconformities, below).
- If a mine is seeking **IRMA 50 or IRMA 75**, those achievement levels will not be granted if there are any major nonconformities with critical requirements. Achievement levels may be granted if there are minor nonconformities with critical requirements, but the mine must develop a corrective action plan to address them (see [Table 5](#), below). If corrective actions are not implemented within prescribed timeframes the achievement level may be withdrawn (see those sections, below).

For mines seeking **IRMA 50 or IRMA 75**, minor nonconformities with non-critical requirements are allowed. Development of corrective actions is encouraged, but not required. However, in cases where a mine is striving to progress to a higher achievement level with its next audit cycle, development of corrective actions for non-critical requirements is strongly recommended.

- If a mine is seeking **IRMA Transparency**, it is not required to develop a corrective action plan to address nonconformities. Mines may, of course, do so voluntarily to demonstrate that they have a plan in place for continuing improvement.

Failure to Address Nonconformities

Depending on whether or not nonconformities are addressed in the appropriate timeframes, the following may occur:

Suspension or withdrawal of certificates or verified achievement levels

Certificates and verified statements of achievement will be suspended by a certification body if there is evidence that the operating company has failed to satisfactorily address nonconformities as required in [Table 4](#) and [Table 5](#), below. When suspensions are issued mines may not make any claims related to the suspended achievement level. Certificates and verified statements of achievement may also be withdrawn by a certification body (CB) if there is evidence that the operating company has failed to meet contractual obligations.

Additionally, any mine site holding a certificate or verification statement may voluntarily cancel its certification/verification at any time by notifying the CB.

Suspensions will be lifted if nonconformities are satisfactorily addressed within 6 months. When lifted, the certification or verified statement of achievement will be reinstated.

If the nonconformities that led to suspension are not satisfactorily addressed within 6 months, the certificate or the verified statements of achievement will be withdrawn. There is the potential to have the suspension extended for an additional 6 months if progress is being made but there are extenuating circumstances that prevented fulfillment of corrective actions within the allotted time frame.

If the nonconformities that led to the suspension are satisfactorily addressed in the appropriate timeframe, the certificate or the verified statements of achievement can be reinstated. If the nonconformities that led to the suspension are not satisfactorily addressed in the appropriate timeframe, the original certificate or verified statement of achievement will be withdrawn.

Any change to a mine's achievement level will be updated in the mine's information on the IRMA website and IRMA Engagement Map.

Table 4. Timelines for closing nonconformities for mines seeking IRMA 100.

	Time frame for corrective actions	Failure to fulfill corrective actions in time
Initial audit		
Critical Requirements	<p>Critical requirements rated substantially or partially met must be fully met <u>before</u> an IRMA 100 certificate is issued.</p> <p>If the draft initial audit report shows that not all critical requirements have been fully met, then as per Step 11 mines can take an optional 12 months from the completion of the initial audit to develop a corrective action plan, implement changes and have auditors verify that critical-requirements are fully met.</p>	<p>If a mine decides not to follow Step 11, then if it does not fully meet all critical requirements it will be awarded the appropriate lower achievement level.</p> <p>If a mine opts to follow Step 11, but corrective actions are not successful, and all critical requirements are not being fully met within 12 months of the completion of the initial audit, the mine will be awarded the appropriate lower achievement level.</p>
Non-Critical Requirements with Major Nonconformities	<p>All non-critical requirements must be rated fully or substantially met <u>before</u> an IRMA 100 certificate is issued.</p> <p>If the draft initial audit report shows that not all non-critical requirements have been fully or substantially met, then as per Step 11 a mine can take an optional 12 months from the completion of the initial audit to develop a corrective action plan, implement changes and have auditors verify that all non-critical requirements are at least being substantially met.</p>	<p>If a mine decides not to follow Step 11, then if it does not fully or substantially meet all non-critical requirements it will be awarded the appropriate lower achievement level.</p> <p>If a mine opts to follow Step 11, but corrective actions are not successful, and all non-critical requirements are not being fully or substantially met within 12 months of the completion of the initial audit, the mine will be awarded the appropriate lower achievement level.</p>
Initial audit, continued. . .		
Non-Critical Requirements with Minor Nonconformities	<p>An IRMA 100 certificate may be issued if all ratings on all non-critical requirements are substantially met or higher (i.e., there are only minor nonconformities, and the number of minor nonconformities does not cause the score in any one principle to be below 90%).</p> <p>If there are too many minor nonconformities, then as per Step 11 a mine can take an optional 12 months from the completion of the initial audit to develop a corrective action plan, implement changes and have auditors verify that the remaining number of minor nonconformities is low enough to enable a score of 90% or higher in each principle of the Standard.</p>	<p>If a mine decides not to follow Step 11, then if it does not fully or substantially meet all non-critical requirements it will be awarded the appropriate lower achievement level.</p> <p>If a mine opts to follow Step 11, but not enough corrective actions are implemented within 12 months of the completion of the initial audit to enable a score of 90% or higher in each principle,</p>

	Time frame for corrective actions	Failure to fulfill corrective actions in time
		the mine will be awarded the appropriate lower achievement level.
Surveillance and recertification audits		
Critical Requirements	Pre-existing nonconformities (major or minor) with critical requirements: If an IRMA 100 certificate was previously issued, it means that all critical requirements were being fully met. There are no pre-existing major or minor nonconformities with critical requirements.	Not applicable
	New nonconformity (major or minor) with a critical requirement: If a certificate was previously issued but a new nonconformity with a critical requirement is found during a surveillance or recertification audit, the mine has 3 months from receipt of the certification body's draft report to make changes and have critical-requirement ratings verified as being fully met.	If a new nonconformity with a critical requirement is not being fully met within 3 months of receipt of the certification body's draft report the IRMA 100 certificate will be suspended.*
Non-Critical Requirements with Major Nonconformities	Pre-existing major nonconformities with critical requirements: If an IRMA 100 certificate was previously issued, it means that all non-critical requirements were being substantially or fully met. There are no pre-existing major nonconformities with non-critical requirements.	Not applicable
	New major nonconformities with non-critical requirements: If a certificate was previously issued, but a new major nonconformity with a non-critical requirement is found during a surveillance or recertification audit, the mine has 3 months from receipt of the certification body's draft report to make changes and bring the non-critical requirement rating up to substantially met.	If a new major nonconformity is not satisfactorily addressed within 3 months from receipt of the certification body's draft report (i.e., does not achieve at least a substantially met rating) the IRMA 100 certificate will be suspended.*
Non-Critical Requirements with Minor Nonconformities	Pre-existing minor nonconformities with non-critical requirements: If there were minor nonconformities with noncritical requirements during the initial audit and some or all were not addressed as per Step 11 (i.e., the optional 12 months was not taken, or sufficient corrective actions were not implemented during the optional period) then a mine must demonstrate at the surveillance audit that these requirements are being fully met.	If pre-existing minor nonconformities from the initial audit are not fully met by the surveillance audit or recertification audit (whichever comes first) the IRMA 100 certificate will be suspended.*
	New minor nonconformities with non-critical requirements: If a certificate was previously issued, but one or more new minor nonconformities are found for non-critical requirements during a surveillance or recertification audit, the mine must develop a corrective action plan, and has until the next recertification or surveillance audit (whichever comes first) to correct the nonconformity.	If new minor NCs are not fully met by the next audit (surveillance or recertification, whichever comes first) the IRMA 100 certificate will be suspended.*

* In the event of a suspension the IRMA 100 certificate may be reissued if the nonconformity is resolved within 6 months of the suspension date. If not satisfactorily addressed within 6 months, the IRMA 100 certificate will be withdrawn.

Table 5. Timelines for closing nonconformities for mines seeking IRMA 50 and IRMA 75.

	Time frame for corrective actions	Failure to fulfill corrective actions in time
Initial audit		
Critical Requirements	Critical requirements rated partially met or not met during the initial audit must be at least substantially met <u>before</u> an IRMA 50 and 75 certificate is issued. If the draft initial audit report shows that not all critical requirements have been fully or substantially met, then as per Step 11 a mine can take an optional 12 months from the	If a mine decides not to follow Step 11 , then if it does not substantially or fully meet all critical requirements, it will be awarded the IRMA Transparency achievement level. If a mine opts to follow Step 11 , but corrective actions are not successful, and all

	completion of the initial audit to develop a corrective action plan, implement changes and have auditors verify that all critical requirements are being at least substantially met.	critical requirements are not substantially or fully met within 12 months of the completion of the initial audit, the mine will be awarded the IRMA Transparency achievement level.
Non-Critical Requirements	Not applicable. A mine is not required by IRMA to develop corrective action plans for non-critical requirements. The mine is encouraged to voluntarily set goals for addressing nonconformities with non-critical requirements over time, especially if it wishes to demonstrate to stakeholders that it is committed to continual improvement.	Not applicable. Even if a mine voluntarily develops corrective action plans with timelines, there is no penalty in the IRMA system for not achieving the stated goals.
Surveillance and recertification audits		
Critical Requirements	Pre-existing major nonconformities with critical requirements If an IRMA 50 or 75 certificate was previously issued, it means that all critical requirements were being substantially met or fully met (i.e., there were no major nonconformities).	Not applicable
	New major nonconformities: If a new major nonconformity with a critical requirement is found during the surveillance or recertification audit, the mine has 3 months from receipt of the certification body's draft report to implement corrective actions to bring it to at least a substantially met rating.	If a new major nonconformity is not closed within 3 months from receipt of the certification body's draft report the mine's IRMA 50 or 75 achievement level will be suspended.*
	Pre-existing minor nonconformities with critical requirements: If there were minor nonconformities with critical requirements during the initial audit and some or all were not addressed as per Step 11 (i.e., the optional 12 months was not taken, or sufficient corrective actions were not implemented during the optional period) then mines must demonstrate at the next recertification audit that these requirements are being fully met.	If pre-existing minor nonconformities from the initial audit are not fully met by the next recertification audit, then the mine's IRMA 50 or 75 achievement level will be suspended.*
	New minor nonconformities with critical requirements: If a new minor nonconformity with a critical requirement is found during a surveillance or recertification audit, the mine has until the next recertification audit (whichever comes first) to demonstrate that the critical requirement is being fully met.	If new minor nonconformities are not fully met by the next recertification audit, the mine's IRMA 50 or 75 achievement level will be suspended.*
Non-Critical Requirements with Major or Minor Nonconformities	Not applicable. A mine is not required by IRMA to develop corrective action plans for non-critical requirements. The mine is encouraged to voluntarily set goals for addressing nonconformities with non-critical requirements over time, especially if it wishes to demonstrate to stakeholders that it is committed to continual improvement.	Not applicable Even if a mine voluntarily develops corrective action plans with timelines, there is no penalty in the IRMA system for not achieving the stated goals.

* In all cases, a suspended achievement level may be reinstated if the nonconformity is resolved within six (6) months of the suspension. If not satisfactorily addressed within 6 months, the verification statement for the achievement level will be withdrawn.

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To view actual audit reports, go to: Mines Under Assessment on the IRMA website.³²

³² <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/>

Annex F – Mine Site Assessment Complaints Process

What is a mine site assessment complaint?

A complaint is an expression of dissatisfaction by any person or organization, in this case, relating to the activities or lack of activities of a certificate holder or a certification body (CB). Complaints may be filed, for example:

- If a mining company or stakeholder takes issue with the assessment process, the competency of auditors or other assessment-related services
- If a mine believes that a CB has failed to grant a certification or verified level of achievement even though the mine's performance warranted a certain achievement level
- If a stakeholder believes that a mine has wrongly been granted certification, IRMA 50 or IRMA 75, i.e., the mine is not meeting the requirements needed to achieve those levels

How to file complaints related to a mine site assessment

Each CB is required to have procedures in place to accept and respond to complaints. Procedures will be publicly available or available to mines and stakeholder upon request. Contact information for the CBs will be provided on a web page devoted to each the mine site assessment listing on the IRMA website.³³

How to file complaints related to IRMA

If complaints are related to the IRMA Mining Standard and its requirements (e.g., stakeholders believe IRMA has the wrong metrics) or other issues related to the IRMA certification system (e.g., procedures outlined in this manual or in other policy documents) any stakeholder including mining companies may file a complaint with IRMA through its Issues Resolution Procedure.³⁴

³³ The listing of mines and links to their pages can be found at: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/>

³⁴ For more about filing a complaint with IRMA, visit IRMA's website: <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

IRMA's Issues Resolution Procedure is available on the Resources page of IRMA's website, under IRMA Policies and Procedures. <https://responsiblemining.net/resources/#resources-irma>