



Communications and Claims Policy

Version 2.0

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Responsibility for this policy

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

Version No.	Date	Description of Action or Amendment
1.0	11 February 2021	First publication
1.1	23 July 2021	Clarification – no use of member logo in email signatures
2.0	12 April 2023	Second publication

1.0 Purpose and scope

Through this Communications and Claims Policy, IRMA seeks to ensure that all communications made in relation to the IRMA system and third party-verified performance against its standards adhere to the concepts of truthfulness, clarity, accuracy, and transparency.

This policy applies to use of IRMA Trust Marks (which include visual representations such as logos or labels, and text-based claims), as well as approved messages, straplines and clarifying statements for various situations.

The policy outlines IRMA-approved communications and claims that may be used by IRMA participants¹ in relation to:

- IRMA membership
- Achievement levels reached by mines that have had independent, third-party audits against any of the IRMA Standards
- Use of Mine Measure Self-Assessment Tool)
- The purchase of materials from IRMA-achieving mines (i.e., chain of custody claims), and statements that can be made prior to wide availability of IRMA verified/certified material in the marketplace.

This policy does not address communications related to completion of auditor training courses or attendance at workshops for consultants or other stakeholders on the IRMA system or its Standards. Those who complete IRMA training or workshops are encouraged to communicate about their coursework, but communications are expected to follow the guidance provided to you by your trainer or as listed on any certificate of completion provided at the end of the IRMA-led course. For questions on what you can say when trained by IRMA, or engaging in IRMA working groups and workshops, please write to us at: info@responsiblemining.net.

1.1 Definitions

IRMA 100: A mine, exploration project, or mineral processing operation independently audited against the relevant IRMA Standard and assigned a score of 100 by the audit firm.

IRMA Trust Marks: Visual representations such as logos or labels and text-based claims that convey endorsement by IRMA or assessment against the IRMA Standard(s).

¹ Participant means an entity that has been accepted into the IRMA system and has paid appropriate fees and dues (e.g., an IRMA member from any stakeholder group, a mining company with a mine site that has been or is in the process of being independently audited, an entity that is using the Mine Measure self-assessment, a purchaser of mined materials making Chain of Custody claims of sourcing materials from IRMA-audited mines,).

IRMA-achieving material: Material sourced from an IRMA-achieving project via a purchaser that has been verified as meeting IRMA's Chain-of-Custody Standard (when available).²

IRMA-achieving project: A mining operation, development/exploration project, or mineral processing operation independently assessed against an IRMA Standard by an IRMA trained and approved audit firm and assigned a score of IRMA Transparency, 50, 70, or 100 by the audit firm.

IRMA member in good standing: A member who is current with fees and in compliance with all IRMA qualifications and policies.

Participant: An entity that has been accepted into the IRMA system and has paid appropriate fees and dues (e.g., an IRMA member from any stakeholder group, a mining company with a mine site that has been or is in the process of being independently audited, an entity that is using the Mine Measure self-assessment tool, a purchaser of mined materials making claims of sourcing materials from IRMA-audited mines.

Pending Members: The Pending Member category has been eliminated per the [IRMA membership policy](#). Existing Pending Members are grandfathered under the old policy. Mining companies in this category are considered Pending Members until they publicly announce the commencement of a third-party audit of at least one mine site, which must occur within 12 months following approval of membership application. Development/exploration/processing companies in this category are considered Pending Members until they publicly announce commencement of an IRMA third party audit of at least one site/project within 12 months of the IRMA Standard update that covers their type of project.

Verified or independently assessed: Evaluated against an IRMA Standard by an IRMA approved and trained audit firm.

² The IRMA Chain of Custody Standard is currently in draft form. (IRMA. 15 October, 2020. Draft Chain of Custody Standard. <https://responsiblemining.net/wp-content/uploads/2020/11/IRMA-Chain-of-Custody-Standard-DRAFTv1.0-October2020.pdf>)

2.0 Rules on communications related to use of IRMA Trust Marks

The following sections give a detailed overview of the communication rules that apply in the IRMA system. [Annex 1](#) and [Annex 2](#) provide additional information regarding the use of the IRMA family of Trust Marks (i.e., IRMA's logos, labels and related text claims), and approved messages, straplines and clarifying statements for various situations. [Annex 3](#) provides additional approved language to add context to IRMA achievement levels.

2.1. Use of the IRMA logo

IRMA's logo may be approved for use by various members, partners, funders and others as long as its use is not misconstrued as an endorsement by IRMA. Clarifying statements will be required to reduce the possibility of misleading statements and all IRMA logo requests must be approved by IRMA in writing and follow the [IRMA branding guidelines](#). Send logo requests and requests for information on IRMA branding guidelines to: info@responsiblemining.net.

2.2. Use of the IRMA member logo

IRMA's member logo may be used by IRMA members who are in good standing. Table 2.2.1 includes other approved communications associated with IRMA membership.

Table 2.2.1. Communications by IRMA Members

Communications Channels	Communications by IRMA members
<ul style="list-style-type: none"> • Member website • Annual reports, sustainability reports • Communication materials (e.g., letters, PowerPoint presentations) • Promotional materials 	<ul style="list-style-type: none"> • Members are encouraged to use the IRMA member logo to communicate their commitment to IRMA's mission of forwarding more responsible mining. • Pending members are not allowed to use the title "IRMA Member" or the IRMA member logo.³ • Membership is distinct from independently assessed project performance. The Member logo and text claims shall not be used to imply that IRMA achievement has occurred. • Members are encouraged to add explanations regarding what IRMA membership entails. Standard explanations are available in Annex 2. • Members are expected to follow the general communications rules (Annex 1). • Members in the purchasing and finance sector are expected to encourage mining companies to engage in IRMA through third-party assessment and communicate an interest in sourcing materials from, or investing in, mines independently audited in the IRMA system. The IRMA Member logo may be used in these communications, which could include: sourcing guidelines; public commitments to source from and invest in IRMA-assessed mines, and direct outreach. • IRMA members from other sectors are expected to make statements that engaging in IRMA is an active way for mining companies and purchasers of mined materials to improve environmental and social responsibility in the mining supply chain and that audit reports are valued for providing key information to support more informative dialogue between stakeholders. IRMA members may use the IRMA logo in these communications.
<ul style="list-style-type: none"> • Email signature • Products (finished or raw) and their packaging • Product inserts • Product invoices or other documents related to sales 	<ul style="list-style-type: none"> • Neither the IRMA member logo nor clarifying texts (see Annex 3) related to IRMA membership are allowed to be added to email signatures. • Neither the IRMA member logo nor clarifying texts (see Annex 3) related to IRMA membership are allowed to be used on products or packaging.

2.3. Mines sites that have undergone independent, third-party audits

Communications for mines that have been independently assessed against the IRMA Standard for Responsible Mining vary based on the level of achievement that has been reached by the mine (i.e., IRMA Transparency, IRMA 50, IRMA 75 or IRMA 100).

Table 2.3.1. Communications by IRMA-achieving mines

Communications Channels	Communications by IRMA-achieving Mines
<ul style="list-style-type: none"> • Mine or Mining Company website • Company annual reports, sustainability reports • Communication materials (e.g., letters, PowerPoint presentations) • Promotional materials • Point of Sale materials (e.g., invoices, other sales-related documents) • Products • Product packaging, product invoices, product inserts 	<ul style="list-style-type: none"> • No claims related to a mine's performance in IRMA can be made until the public summary of the mine's audit report has been released. At that time, mines are encouraged to use the IRMA family of Trust Marks to communicate their achievement (i.e., IRMA Transparency, IRMA 50, IRMA 75 or IRMA 100). Trust Marks may be used on mined materials or materials related to sales of their mineral products to first buyers (e.g., from the gate of the achieving mine). • Mining companies must add clarifying text to denote which specific mine was verified as reaching the achievement level (see Annex 2 for clarifying statements related to Achievement Levels and Annex 3 for additional approved context) and the stated achievement level must match the achievement level documented by the Certification Body (see Annex 1, rule 1.11). • All mines must follow the general communications rules (Annex 1). In particular, note that most uses of the IRMA family of Trust Marks will require a clarifying statement. Usage of the Trust Marks and their clarifying statements require generic approval (i.e., mines may automatically use language described in the IRMA Communications and Claims Policy) or, if not covered in this policy, case-specific approval prior to use. • IRMA does not allow the word “certified” to describe achievement in IRMA; rather mining companies should speak to the achievement level of specific mines audited against the IRMA Standard and encourages mining companies to make commitments around plans for continued improvement. • The word ‘sustainable’ is not allowed in any claims related to engagement in, or achievement levels in the IRMA system.

2.4. Mines sites that are using the Mine Measure Tool

Communications by mines that have not been audited but that have completed or are in the process of self-assessing using the IRMA Mine Measure Self-Assessment Tool⁴ are found below.

Table 2.4.1. Communications by mines using the Mine Measure self-assessment tool

Communications Channels	Communications by Mines Using the Mine Measure Self-Assessment and Audit Preparation Tool
<ul style="list-style-type: none"> • Mine or Mining Company website • Company annual reports, sustainability reports • Communication materials (e.g., letters, PowerPoint presentations) • Promotional materials 	<ul style="list-style-type: none"> • Owners/operators are encouraged to communicate that they used or are using the Mine Measure self-assessment tool to better understand how their practices compare with the IRMA Standard for Responsible Mining. • No claims of IRMA achievement (i.e., IRMA Transparency, IRMA 50, IRMA 75 or IRMA 100 Certified) may be made when using the IRMA Mine Measure tool for self-assessment purposes nor may claims be made when using auditors and/or a process outside the formal IRMA-approved independent audit process. • A company using the tool may share a mine site's self-assessment results publicly or with third parties, as long as the company is clear that results reflect a self-assessment or self-evaluation, and the company neither states nor implies that the mine site's scores or performance have been verified by an independent, third-party.

⁴ The Mine Measure Tool is available at: <https://tools.responsiblemining.net/self-assess>

2.5. Purchasers that are interested in sourcing from IRMA-achieving mines

Companies that have made public commitments to source IRMA-achieving material, or that are purchasing materials from mines that have undergone independent, third-party audits may use the approved communications found below.

Table 2.5.1. Communications by purchasers sourcing from IRMA-achieving mines

Communications Channels	Communications by Purchasers
<ul style="list-style-type: none"> • Your website • Annual reports, sustainability reports • Communication materials (e.g., PowerPoint presentations) • Promotional materials • Point of sale materials • Products 	<ul style="list-style-type: none"> • Purchasers are encouraged to communicate their desire/intention to buy material from mines that have been independently audited against the IRMA Standard for Responsible Mining. • IRMA encourages purchasers to become IRMA members and invest in IRMA's programs to increase the number of mines engaged and, as a result, increase the opportunity to access materials from IRMA-verified mines. • IRMA Members from the purchasing sector may use the IRMA membership logo alongside their demand/commitment to buy materials from IRMA-achieving mines, but other IRMA Trust Marks may only be used in relation to the purchase of IRMA-achieving materials.

3.0 Monitoring the use of IRMA Trust Marks

There are several means through which IRMA monitors the use of Trust Marks. The IRMA Secretariat:

- Reviews advance drafts of press releases which members, mines that have successfully completed an IRMA audit, and entities purchasing from (or investing in) IRMA-assessed mines are planning to issue to ensure that any claims are accurate prior to publishing the press release.
- Periodically monitors use of approved Trust Marks, e.g., prior to and following surveillance and 3-year re-assessment audits, prior to the annual renewal of membership, and annually for participants using the Mine Measure. Monitoring includes review of participants' websites and other online sources that mention both the participant and IRMA.
- May request information from a participant on where and how IRMA claims have been made and Trust Marks have been used.

IRMA requires Audit Firms to monitor the use of IRMA Trust Marks by its clients (mine sites) that undergo independent, third-party audits in the IRMA system. Audit Firms are required to notify the IRMA Secretariat within seven days of detecting any incorrect use of Trust Marks.⁵

Additionally, any stakeholder may file a complaint with IRMA against a member or other entity participating in the IRMA system (e.g., those using the IRMA self-assessment tool, mines (whether operated by a member or nonmember company) that have undergone independent, third-party assessment) alleging that the entity has made false, inaccurate or misleading claims related to the IRMA system or has inappropriately used an IRMA Trust Mark. Complaints related to claims will be handled according to IRMA's Issues Resolution Procedures.

⁵ IRMA. November 2019. IRMA Audit Firm Requirements. p. 24. (See requirements 28 and 29). https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

4.0 Penalties for misuse of Trust Marks

When false, inaccurate, misleading or inappropriate use of IRMA Trust Marks—including visual representations such as logos, labels, and text-based claims—have been identified through monitoring, complaints or other means, the IRMA Secretariat will:

- Notify the IRMA participant of the breach of IRMA's Communications and Claims Policy, including details on the particular false, inaccurate, misleading or inappropriate use of any Trust Marks
- Seek immediate corrective action(s) from the participant
- Verify the implementation of the corrective action(s)
- Document the breach and corrective actions sought and implemented
- If not corrected in a timely manner IRMA reserves the right to cease its association with the IRMA participant.

In cases where breach of the Communications and Claims Policy is serious enough to create potential harm to the credibility or reputation of the IRMA system (e.g., the breach of claims is clearly deliberately fraudulent, a participant does not implement corrective actions in a timely manner, or a participant repeatedly violates the policy), IRMA reserves the right to cease its association with the participant (e.g., Membership could be revoked, certificates/levels of achievement canceled), or initiate probation pending corrective actions.

Annex 1: General communications rules

Participants in the IRMA System (members, IRMA-achieving mines, purchasing companies sourcing materials from IRMA-achieving mines, users of the Mine Measure self-assessment and audit preparation tool) shall abide by the following communications rules.

IRMA participants are encouraged to communicate about their engagement with IRMA:

- **Members are encouraged to use the IRMA membership logo** and to issue clarifying statements, as well as additional explanations regarding their participation in IRMA,
- **IRMA-achieving mines** are encouraged to use the appropriate IRMA Trust Mark and required clarifying statement for communications about their mine and its materials,
- **Mine Measure users are encouraged to communicate that they are using the self-assessment tool** to get a sense of how their practices compare with the IRMA Standard for Responsible Mining and to improve practices,
- **Purchasing companies seeking to source or sourcing IRMA materials are to promote their supportive actions in compliance with [section 2.5](#).**

In doing so, IRMA participants shall respect the following rules:

1. The name, logos and marks of IRMA shall always be used in a way that safeguards the reputation of IRMA, its members and its certificate holders.
2. The name, logos and marks of IRMA shall in no instance be used in a way that could induce a misunderstanding about the practices of the organization in question. All communications must adhere to credibility concepts of truthfulness, clarity, accuracy, and transparency.
3. The name, logos and marks of IRMA shall not be used in a way that could mislead other parties regarding IRMA, the organization in question, or IRMA's association with or endorsement of anything produced with mined materials – in particular regarding whether a product is 100% segregated or mixed with other materials.
4. IRMA is not a mining company, manufacturer or distributor of any final or intermediate products. The name, logos and marks of IRMA shall never be used in a way that could give the impression that IRMA is a supply chain actor.
5. Prior to use, all entities must have generic approval (as described in this IRMA Communications and Claims Policy) or, if not covered in this policy, obtain case-specific prior approval for the use of the IRMA Trust Marks (i.e., logos, labels and text claims).
6. Organizations are not allowed to use any IRMA Trust Marks or clarifying statements regarding IRMA except those in the [Annex 2](#) without written permission from IRMA.

7. No written approval is required for the use of the clarifying statements as described in [Annex 2](#) of this claims policy. However, written permission is required for any modification of these statements. Modifications are not encouraged and will only be approved in special cases.
8. No written approval is required for an organization's additional explanations regarding its own value/interest to engage in IRMA or its sourcing of IRMA-achieving materials, providing it complies with this policy and stays accurate/consistent with the straplines and statements as described in [Annex 2](#).
9. Organizations shall inform IRMA when they plan to communicate about their affiliation with IRMA in writing, including but not limited to the use of IRMA Trust Marks, clarifying statements and additional explanations (i.e., the text used and the type of communication materials to which the text is applied).
10. Members may only communicate about their membership in case of continued good-standing with regard to membership agreements and fees.
11. IRMA-achieving mines may only communicate about their scoring (IRMA 100, 75, 50 or Transparency) if they possess a valid up-to-date IRMA statement of achievement from an IRMA-approved Audit Firm.
12. IRMA encourages purchasers to explain their commitments to purchase or source responsibly mined materials from IRMA-achieving mines but may not use the IRMA Trust Marks in relation to these commitments or targets.
13. No IRMA Trust Marks or logos are allowed related to general use of the IRMA Mine Measure self-assessment tool. Companies are allowed to communicate that they are using the self-assessment tool.
14. The word 'certified' is generally not used in IRMA and instead companies should speak to the achievement level of specific mines.
15. The word 'sustainable' is not allowed in any claims related to engagement in, or achievement levels in the IRMA system.

Annex 2: Approved messages and clarifying statements for entities associated with IRMA

IRMA Members (Entities – Companies, Organizations, Individuals – in any sector that are members of IRMA)

- [Entity] is a member of IRMA, the Initiative for Responsible Mining Assurance. We support the vision of a world where the mining industry respects the human rights and aspirations of affected communities, provides safe, healthy and supportive workplaces, minimizes harm to the environment, and leaves positive legacies.
- ABC Company (or Organization or Individual or etc.) is a member of IRMA, the Initiative for Responsible Mining Assurance. This means we support credible independent third-party verification of performance against a comprehensive best-practice standard that addresses the full range of environmental and social issues related to industrial-scale mines.
- Specifics of the organization's participation or engagement can be added by the member

Mine Sites Using the Mine Measure Self-Assessment and Audit Preparation Tool

- We are using IRMA's Mine Measure self-assessment tool to self-evaluate (or carry out an internal assessment of) our performance against the IRMA Standard for Responsible Mining.

IRMA Transparency Mines

- ABC's Galaxy Mine has achieved the level of IRMA Transparency, which means that the mine has undergone an independent, third-party audit of its performance relative to the IRMA Standard, and the mine has publicly released its results.

IRMA-achieving Mines at 50, 75 and 100

- **50 Level Only:** ABC's Galaxy Mine has been independently assessed by the audit firm as achieving the level of IRMA 50, which means the mine achieved an average score of 50% or higher in all four principle areas of the IRMA Standard (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility). Verified within this score is that the mine fully meets, or substantially meets and has an approved timebound plan to fully meet, a set of critical requirements for protecting social and environmental values.
- **75 Level Only:** ABC's Galaxy Mine has been independently assessed by the audit firm as achieving the level of IRMA 75, which means the mine achieved a score of at least 75% in all four principle areas of the IRMA Standard (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility). Verified within this score is that the mine fully meets, or substantially meets and has an approved timebound plan to fully meet, a set of critical requirements for protecting social and environmental values.
- **100 Level Only:** ABC's Galaxy Mine has been independently assessed by the audit firm as achieving as the "IRMA 100" level of performance against the Standard for Responsible Mining. This means Galaxy has met a set of critical requirements and has fully met, or substantially meets and has an approved timebound plan to fully meet, all other relevant requirements in the *Standard for Responsible Mining*.

Caution:

Use of the phrase 'responsible mine.'

In communicating your achievement level in IRMA, we encourage you to use the score the mine has received, and specific aspects of achievement in lieu of the phrase 'responsible mine' in your communications.

For example:

- ABC's Galaxy mine was independently verified as achieving IRMA 75, and we are proud that the mine reached scores of greater than 90% in seven chapters.

The phrase responsible mining can be used in terms of the concept itself, progress towards, or related to the IRMA Standard for Responsible Mining and IRMA's mission to further responsible mining.

Annex 3: Additional approved language related to mine achievement and sourcing from IRMA-achieving mines

IRMA Background Language for Context on Mine Achievement and Sourcing

The following language may be paired with language specific to the achievement of a mine or the purchase of IRMA-verified mined materials, to provide context on the IRMA system and the commitment/achievement associated by engaging in this system:

1. Mines that engage in IRMA's independent mine site audits are assessed against the most comprehensive and rigorous mining standard in the world – a standard that has 26 chapters and more than 400 requirements related to the environmental, social and business integrity issues most relevant at mine sites.
2. No other sustainability standards system in the mining sector conducts its audits as rigorously nor has as much credibility among stakeholders. The IRMA audit is conducted by an independent, third-party audit firm and takes place at the site of the mine over days, not hours. No other mineral sourcing standards system publicly notices audits, and reaches out as extensively to the mine's various stakeholders to ensure they are aware of the audit. IRMA also requires interviews of both affected communities and mine workers.
3. IRMA's public audit summary reports provide more detailed information about a mine's performance against a wide range of social and environmental issues than any other system. This includes chapter-by-chapter scores, as well as information on the mine performance on every relevant requirement. Transparency at this level allows diverse stakeholders – the mining company itself, customers, investors, workers, and nearby communities – to see where both achievements and risks exist. This also allows the mining company to speak both to strengths and challenges, and make commitments to improve.
4. No other industrial mining standard has been developed through such a comprehensive, multi-stakeholder and public process, and no other system has the sort of equal governance where decision making is shared equally among all stakeholders groups – mining companies, purchasers, investors, affected communities, labor, and civil society groups.
5. Mines that engage in IRMA are signaling to investors and purchasers that they are willing to step into the world's most rigorous review and to share publicly their achievements as well as their challenges. Most modern societies use mined materials, and we know that the extraction, use, and reuse/recycling/disposal come with impacts. A world of informed diverse stakeholders can create incentives, innovation and market value for more responsible practices. Mines which engage in IRMA are demonstrating a willingness to be transparent about performance – both achievements of which they're proud and challenges they face. This provides them also with a platform to make commitments for improvement over time.

6. Regardless of a mine's achievement score against the IRMA Standard for Responsible Mining, mines independently assessed within the IRMA program offer a greater quantity of information about their practices, are more robustly verified, and are measured against a more rigorous definition of best practices in mining than if measured by other current voluntary responsible mining programs.

Purchasers and investors who encourage and incentivize mining companies to engage in IRMA's independent third party assessment and transparent sharing of results, support responsible sourcing/investing goals by using a system (as described using the text above) to create market value for more responsible mining. This can be described to align with a purchaser/investor commitment on key topics such as forwarding human rights, reducing greenhouse gas emissions, protecting water resources, respecting indigenous people's free, prior and informed consent, protecting biodiversity, forwarding safe management of mine waste (tailings and more), supporting community engagement, etc.⁶

⁶ NOTE: You may contact IRMA about other topics covered in the IRMA Standard for Responsible Mining. info@responsiblemining.net