



Initiative for Responsible
Mining Assurance
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Steven Cornish
ANSI Senior Director of International Policy and Strategy
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Dear Mr. Cornish,

Thank you and your colleagues at the American National Standards Institute (ANSI) for the opportunity to submit comments on the [DIN ISO Sustainable Raw Materials Proposal](#).

We do not think the ISO Sustainable Raw Materials standard as outlined in this proposal is needed because the Initiative for Responsible Mining Assurance (IRMA) is already addressing the gaps identified in the proposal.

The IRMA *Standard for Responsible Mining* and system are available for global application and are relevant across materials. The IRMA Standard was developed based on over a decade of input from a broad cross-section of stakeholders representing mining companies, purchasing companies, civil society, affected communities, labor unions, governments, investors, and academia. The resulting IRMA Standard provides comprehensive coverage of the wide range of impacts of industrial scale mining. We are currently expanding this widely trusted standard to incorporate our draft mineral exploration and draft mineral processing standards. Both draft standards have already undergone initial rounds of public engagement and have been tested in company and civil society-led self-assessments and pilots. An integrated and updated IRMA Standard will soon undergo a robust public engagement process and will be available for third-party audits in 2024. We will also release an updated draft Chain of Custody Standard this year for public engagement, with updates based on an initial round of public comments and pilot tests. The final Chain of Custody Standard will be available for third-party audits in 2024.

IRMA's independent third-party audit system is also widely trusted and respected. Our system is based on the ISO 17021 standard and is valued for its level of rigor in accrediting independent audit bodies, the depth of requirements for the audit process, including site level interviews with site managers, regulators, labor unions, workers, impacted communities, and other stakeholders and rights holders, and transparent public audit reports, currently covering 26 topics and over 400 requirements.

IRMA has been recognized by multiple governments as a tool to advance responsible management of the mining sector and mineral supply chains. In 2021, the White House referenced IRMA in its 100-Day Review on Building Resilient Supply Chains, noting that IRMA is a possible “method for U.S. companies and the Federal Government to ensure that minerals are being sourced from mines with robust environmental, social, and financial responsibility policies.”¹ The Government of Australia called IRMA a “no regrets approach” in its 2020 study of certifications and strategies to increase competitiveness of Australian battery materials for use in the EV sector in Europe.² The European Parliament referenced the IRMA Standard in its recent strategy for critical raw materials.³ IRMA is also referenced as a globally recognized framework for responsible mining in the United Kingdom’s 2022 Critical Mineral Strategy.⁴

These and other governments are responding to decades of demands from civil society, organized labor, and purchasing companies for responsibly sourced materials. Such demands from civil society were demonstrated in 2021 when over 170 NGOs signed the “Declaration on Mining and the Energy Transition for the United Nations Framework Convention on Climate Change (UNFCCC) 26th Conference of the Parties (COP26).”⁵ The Declaration called for “a just and rapid transition away from fossil fuels and towards a renewable energy system” expressing concern for “the impacts of extracting materials such as lithium, cobalt, nickel and copper for renewable energy technologies on communities, workers and ecosystems around the world.”⁶ It called for ensuring responsible minerals sourcing through legally binding regulations and stringent international environmental and human rights standards with independent, third-party verification of compliance, like IRMA.⁷

¹ The White House, Building Resilient Supply Chains, Revitalizing American Manufacturing, and Fostering Broad-Based Growth: 100-Day Reviews Under Executive Order 14017, June 2021, <https://www.whitehouse.gov/wp-content/uploads/2021/06/100-day-supply-chain-review-report.pdf>.

² UTS Institute for Sustainable Futures and the University of Melbourne, Certification and LCA of Australian Batter Materials – Drivers and Options: Scene Setting Project Prepared for Future Battery Industries CRC, Future Battery Industries CRC, Australian Government Department of Industry, Innovation and Science Business Cooperative Research Centres Program, August 2020, <https://fbicrc.com.au/wp-content/uploads/2020/10/Certification-of-Au-Battery-Materials-WEBINTERACTIVE-SEPT-2020.pdf>.

³ European Parliament, A European Strategy for Critical Raw Materials, November 24, 2021, https://www.europarl.europa.eu/doceo/document/TA-9-2021-0468_EN.html.

⁴ United Kingdom Department for Business, Energy & Industrial Strategy, Resilience for the Future: The UK’s Critical Minerals Strategy, July 22, 2022, <https://www.gov.uk/government/publications/uk-criticalmineral-strategy/resilience-for-the-future-the-uks-critical-minerals-strategy>.

⁵ Earthworks. Declaration on Mining and the Energy Transition for COP26. 2021, <https://earthworks.org/campaigns/making-clean-energy-clean/declaration-on-mining-and-the-energytransition-for-cop26/>.

⁶ *Id.*

⁷ *Id.*

IRMA's comprehensive coverage and the rigor and transparency of the IRMA system have been recognized in recent assessments of mining sector standards conducted by [BGR](#),⁸ [Germanwatch](#),⁹ the [Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development \(IGF\)](#),¹⁰ and others.

Below please find more detailed comments on the proposal.

- Mine closure and mine reclamation are ongoing processes that should be implemented over the course of the life of a mine. These actions are inherently linked to sustainability of raw material production and are integral parts of the value chain. Mine closure and mine reclamation should be included in the scope of this proposal and in coordination with ISO efforts on mine closure and reclamation under ISO Technical Committee 22 (Mining) Subcommittee 7 (Mine Closure and Reclamation Management). It is critical that interested parties in the supply chain recognize that even when a site is no longer actively producing material, the legacy it leaves behind is still directly linked to the demands of the downstream user.
- The [Initiative for Responsible Mining Assurance \(IRMA\) Standard for Responsible Mining](#)¹¹ is a globally recognized voluntary standard that has been available for industry implementation since 2018. It covers a wide range of sustainability factors—over 400 requirements across 26 topics. These topics and requirements were developed based on over a decade of discussions across a wide range of sectors including mining companies, investors, purchasing companies, affected communities, civil society, and organized labor. There is no need to reinvent the wheel if seeking holistic coverage of the wide range of risks and impacts of industrial scale mining. Mining companies have praised the IRMA Standard for its specificity, noting that IRMA provides a detailed roadmap for implementation of internationally recognized best practices.
- IRMA is governed by a multistakeholder board with equal representation and decision-making authority across six sectors: mining companies, purchasing companies, investors, affected communities, civil society, and organized labor, resulting in a standard and third-party audit and reporting system that are widely respected and trusted.

⁸ BGR, Sustainability Standard Systems for Mineral Resources: A Comparative Overview – 2022, https://www.bgr.bund.de/DE/Themen/Min_rohstoffe/Downloads/studie_sustainability_standard_systems_2022.pdf?__blob=publicationFile&v=14.

⁹ Germanwatch, An Examination of Industry Standards in the Raw Materials Sector: How Standards Contribute to Companies' Fulfilment of their Human Rights and Environmental Due Diligence Obligations, and How They Ensure Effectiveness on Site, 2022, https://www.germanwatch.org/sites/default/files/germanwatch_an_examination_of_industry_standards_in_the_raw_materials_sector_2022-09.pdf.

¹⁰ IGF and IISD, State of Sustainability Initiatives Review: Standards and the Extractive Economy, 2019, <https://www.iisd.org/system/files/publications/igf-ssi-review-extractive-economy.pdf>.

¹¹ IRMA Standard for Responsible Mining IRMA-STD-001, June 2018, <https://responsiblemining.net/resources/#full-documentation-and-guidance>.

- IRMA has developed a [draft IRMA-Ready Standard](#) for Responsible Mineral Exploration and Development¹² as well as a [draft Mineral Processing Standard](#).¹³ These drafts have undergone public engagement and are being integrated into [an updated IRMA Standard](#)¹⁴ that will be released for public engagement this year. The final integrated IRMA Standard will be available for industry implementation in 2024. Entities can begin implementation of IRMA-Ready and the IRMA Mineral Processing standard now through self-assessment through our [Mine Measure](#)¹⁵ tool that is available for free for an entity's first use and is a first step in any IRMA audit. Entities may undergo independent third-party audits under the final integrated standard in 2024.
- IRMA released a [draft Chain of Custody Standard](#)¹⁶ in 2020 that has been revised based on public engagement and pilot tests. The revised draft Chain of Custody Standard will be released for a second round of public engagement this year. The Chain of Custody Standard will also be available for independent third-party audits in 2024.
- These IRMA Standards fill the noted gap referenced in the proposal regarding standards for industry implementation of “sustainable mining, processing and refining operations with accepted criteria for sustainable raw materials.” The IRMA Standard is applicable for industrial-scale mines across materials and has global applicability across jurisdictions. It provides a common standard for all raw materials with few exceptions—IRMA does not currently provide independent third-party assessments of thermal coal, uranium, or deep seabed mining projects due to their unique impacts and risks.
- The IRMA Standard incorporates key ISO Standards and a wide range of best practice international frameworks, including ISO 14001, ISO 45001, and ISO 50001. IRMA's certification body requirements also align with ISO 17021 and incorporate additional requirements to enhance the rigor of the audit program, customized to unique mining sector needs, and engaging with stakeholders and rights holders at the site level to ensure representation of all affected parties. Where relevant, IRMA also refers to the International Accreditation Forum (IAF) mandatory documents to inform the assurance process.
- Implementation of the best practices detailed in the IRMA Standard are assessed at the site level through independent third-party audits

¹² IRMA, Draft IRMA-Ready Standard, 2021, <https://responsiblemining.net/what-we-do/standard/draft-irma-ready-standard/>.

¹³ IRMA Draft Mineral Processing Standard, 2021, <https://responsiblemining.net/resources/#irma-draft-mineral-processing-standard>.

¹⁴ IRMA Standard Development Process, 2023, <https://responsiblemining.net/what-we-do/standard/standard-development/>.

¹⁵ IRMA Mine Measure: Responsible Mining Self-Assessment, <https://tools.responsiblemining.net/self-assess#:~:text=Welcome%20to%20MINE%20MEASURE%2C%20the,on%20metrics%20in%20the%20standard>.

¹⁶ IRMA Draft Chain of Custody Standard, 2020, <https://responsiblemining.net/resources/#irma-draft-chain-of-custody-standard>.

undertaken by IRMA-approved Certification Bodies. IRMA's assurance process is based on the ISO 17021 standard. Our process requires accredited independent audit bodies and stipulates practices related to audit firms, auditors, audit planning and execution, audit reporting, subsequent auditing, and corrective action. We require each audit to include interviews with local site managers, regulators, labor unions, workers, affected communities, civil society, and other stakeholders and rights holders regarding their experience of a site's performance.

- Assessment outcomes are transparently reported to the public, including free public access to audit reports with scores on each requirement and rationale for scores, allowing all stakeholders, rights holders, and interested parties to have access to the outcome of the assessments. This enables accountability and efficiency for stakeholders seeking to promote responsible practices across supply chains.
- IRMA assessments do not result in "exceptions reporting" but rather report performance for each requirement at four levels (does not meet, partially meets, substantially meets, and fully meets), allowing sites to be measured against a best practice standard and improve their performance over time. IRMA has also identified 40 [critical requirements](#)¹⁷ that must be met for a site to be formally recognized with an IRMA achievement level (IRMA 50 or higher).
- IRMA audits are not pass/fail but instead result in an achievement level that serves as an important metric across sectors and encourages continuous improvement. The level of detail in the IRMA Standard and IRMA's tiered achievement levels enable benchmarking across sites.
- As is common in ISO standards related to sustainability, IRMA audits are conducted every three years with surveillance audits conducted and surveillance audit reports published between those three-year intervals. This system enhances transparency and drives continuous improvement at the site level.
- IRMA does not use the term "sustainable mining" or "sustainable raw materials" as mining involves production of non-renewable resources. We do recognize that, when responsibly managed, the mining sector can significantly contribute to sustainable development outcomes across all 17 UN Sustainable Development Goals (SDGs).¹⁸ Implementation of the IRMA Standard contributes to all SDGs and our updates to the standard this year will advance further alignment.

¹⁷ IRMA, What are "Critical Requirements" in the IRMA Standard?," 2022, <https://responsiblemining.net/wp-content/uploads/2022/02/What-are-Critical-Requirements-in-the-IRMA-Standard-Updated2022.pdf>.

¹⁸ See Columbia Center on Sustainable Investment (CCSI), World Economic Forum, United Nations Development Programme (UNDP), and UN Sustainable Development Solutions Network (SDSN), Mapping Mining to the Sustainable Development Goals: A Preliminary Atlas, 2016 and CCSI and Responsible Mining Foundation, Mining and the SDGs: a 2020 Status Update, both available at <https://ccsi.columbia.edu/content/mining-and-sustainable-development-goals>.

See [A Comparative Analysis of the SDGs and the Initiative for Responsible Mining Assurance Standard for Responsible Mining](#)¹⁹ for further details on alignment. We recommend not using the term “sustainable raw materials” for the reasons noted above, and in addition to focusing on the UN SDGs, to place a primary focus on impacts and benefits of operations at the local level, aligned with objectives of local communities and the local workforce.

Please be in touch if we may provide additional information regarding any of the above comments or any aspect of the IRMA Standard and system.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristi Disney Bruckner". The signature is fluid and cursive.

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¹⁹ IRMA, IRMA and the UN Sustainable Development Goals,
<https://responsiblemining.net/about/unsdgs/>.