

Initiative for Responsible Mining Assurance (IRMA) Standard-Setting Public System Report

Version 2.0

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Summary

This document provides a simplified overview of the key aspects of the standard-setting system of the Initiative for Responsible Mining Assurance (IRMA).

This Public System Report is designed to comply with the <u>ISEAL Alliance Standard Setting Code of Good Practice Version 6.0</u> and <u>ISEAL Alliance Standard-Setting Code System Report Outline</u> and thereby to demonstrate compliance with the applicable requirements of ISO/IEC Guide 59 Code of good practice for standardization, and the WTO Technical Barriers to Trade (TBT) Agreement Annex 3 Code of good practice for the preparation, adoption, and application of standards.

Standard

1. Scope

IRMA Standard 2.0

The IRMA Standard for Responsible Mining and Mineral Processing (hereafter called the "IRMA Standard 2.0") has a broader scope than the IRMA Standard for Responsible Mining Version 1.0 (2018) which only covered operating mines. The IRMA Standard 2.0 encompasses the following:

- **Exploration and Development:** mineral exploration and development, prior to the operational phase of a mine.
- **Extraction:** mining and related activities, such as construction of infrastructure or beneficiation that occur on the mine site, and includes requirements that pertain to different phases of the mining life cycle through post-closure activities.
- Processing: mineral processing operations at the mine site or beyond the mine gate such as smelters, refineries and other operations involved in the processing, separation and purification of minerals and metals derived from ores and concentrates.

The IRMA Standard 2.0 is intended to be applicable to all exploration and development projects, all types of industrial- or large-scale mining operations (including surface, sub-surface and solution mining), all types of mineral processing operations, and all mined materials (e.g., minerals, metals), in any land-based geography in the world.

Audits to the IRMA Standard 2.0 are authorized to take place in all countries, in accordance with the IRMA Assurance System. Operations considered illegal in the country where they take place cannot be audited.

The IRMA Standard 2.0 is not intended for application to oil and gas, thermal coal and uranium. IRMA also has a current <u>policy</u> explaining why the IRMA Standard 2.0 is not fit for application for extraction in the deep sea.

IRMA CoC Standard

The IRMA Chain of Custody Standard for Responsibly Mined Materials (hereafter called the "IRMA CoC Standard") has been developed in response to a need to be able to track and provide assurance about the origin and impacts of mined materials being purchased and sold in the marketplace. IRMA's Chain of Custody Standard is intended to complement and dovetail with existing supply chain tracking programs and norms for mined materials, including those of the International Organization for Standardization, the Responsible Jewellery Council, and Responsible Steel.

Audits to the IRMA CoC Standard are authorized to take place in all countries, in accordance with the IRMA Assurance System. Operations considered illegal in the country where they take place cannot be audited.

The IRMA CoC Standard is not intended for application to supply chains of oil and gas, thermal coal and uranium. IRMA also has a current <u>policy</u> explaining why the IRMA Standards, including the IRMA CoC Standard are not fit for application for extraction in the deep sea.

2. Sustainability outcomes

IRMA Standard 2.0

The IRMA Standard 2.0 focuses on the following sustainability issues and outcomes in the mining industry:

Business Integrity

- Legal compliance
- Community and stakeholder engagement
- Human rights due diligence
- Gender Equality & Gender Protections
- Complaints and grievance mechanisms, and access to remedy
- Revenue and Payments Transparency
- Mineral Supply Chain and Responsible Sourcing

Planning and Managing for Positive Legacies

- Environmental and social impact assessment and management
- Free, Prior and Informed Consent (FPIC)
- Obtaining community support and delivering benefits
- Resettlement
- Emergency preparedness and response
- Planning and financing reclamation and closure

Social Responsibility

- Fair labor and terms of work
- Occupational health and safety
- Community health and safety
- Mining and conflict affected or high-risk areas
- Security arrangements
- Artisanal and small-scale mining
- Cultural heritage

Environmental Responsibility

- Waste and materials management
- Water management
- Management of Physical Stability
- Air quality
- Noise and vibration
- Greenhouse gas emissions
- Biodiversity, ecosystem services and protected areas
- Land and Soil Management

IRMA CoC Standard

The IRMA Coc Standard protects the value of material from IRMA-achieving mines, therefore covering all the above promoted in the IRMA Standard 2.0. The IRMA CoC Standard also focuses on the following sustainability outcomes in the responsible sourcing of mined materials:

Management Systems

- General requirements
- Competence
- Internal Assessment Program
- Complaints Procedure
- Outsourcing
- Communication

Sales and Shipping

- General Requirements
- Registry Requirements

IRMA Claims

- Claims for Identity Preserved Model IRMA-Achieving Materials
- Claims for Segregated Model IRMA-Achieving Materials
- Claims for Controlled Blending Model IRMA-Achieving Materials
- Claims for Mass Balance Model IRMA-Achieving Materials
- Claims for Book and Claim Model IRMA-Achieving Materials

3. Why is it needed

Industrialized societies rely on mined materials to function. From household electronics to vehicles, from batteries to renewable energy systems, products that are used daily come from material mined from the Earth. Mining provides investment and financial opportunities for host countries, and important employment and income for local communities. However, the exploration, extraction, and processing associated with mined materials also can negatively impact human rights and the environment on which people depend.

The Initiative for Responsible Mining Assurance (IRMA) envisions 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.

The IRMA Standard 2.0 provides an internationally recognized shared definition of what constitutes best practices in social and environmental responsibility for mineral exploration, extraction, and processing. The Standard serves as the basis for a comprehensive system that is intended to create transparency into mining's impacts, and to improve practices across supply chains through independent verification.

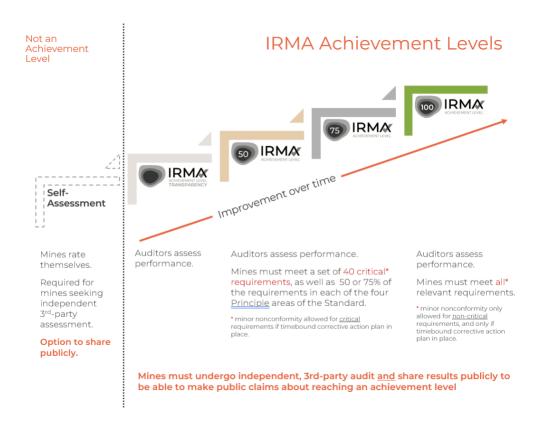
The IRMA CoC Standard sets out specific requirements for tracking material from verified IRMA-achieving mines and mineral processors to market, enabling Entities operating within the supply chain and end users to make credible claims about IRMA-achieving material.

4. Performance levels

IRMA Standard 2.0

The IRMA Standard 2.0 aims to define, recognize, and incentivize best practices for environmental and social responsibility in mining and mineral processing. IRMA recognizes that this is a high standard that has not been described in regulatory frameworks in many countries, and many mining and mineral processing companies may not have seen market value or market differentiation for going beyond a base level of performance. Consequently, IRMA has developed a scoring tool that allows for a richer sense of performance than simply "pass/fail", and furthermore allows for in-depth understanding of performance in each chapter of the IRMA Standard.

The graphic below shows the ladder of recognized achievement levels in IRMA:



IRMA CoC Standard

The process for achieving IRMA Chain of Custody verification is summarized as follows:

- **1. Application** An Entity wishing to pass on an IRMA claim to their customers, completes an application for an IRMA Chain of Custody verification audit with an IRMA-approved Audit Firm (AF).
- **2. Proposal and Agreement** The Entity provides documents requested by the AF for the development of the proposal and, if agreed by the Entity, the AF will enter into an agreement with the Entity to provide assessment services.
- **3. Assessment** The Entity undergoes an audit of its management system and relevant documentation and records, to evaluate the Organization's conformance with the IRMA Chain of Custody Standard to source and/or supply IRMA-achieving material.
- **4. Chain of Custody Verification** Once the AF is satisfied that the Entity has met requirements for verification, including the resolution of all major nonconformances (if any), the Entity will be awarded **IRMA Chain of Custody verification**. (this is the only performance level, equivalent to a standard 'pass/fail' model)
- **5. Surveillance Audit** Surveillance audits are required to ensure the Entity's continued conformance with the CoC Standard.
- **6. Verification Renewal** IRMA Chain of Custody verifications are valid for 3 years, pending successful completion of surveillance audits.

5. Adaptations

IRMA Standard 2.0

Application for all Phases of Mineral Development

One significant change from the 2018 IRMA Standard 1.0 to the 2023 proposed revisions for version 2.0 is that the requirements are meant to apply at any phase of the mineral development life cycle (e.g., exploration, project development, permitting, construction, mining and processing operations, reclamation and closure, post-closure). The Standard recognizes that different aspects of some requirements will be assessed at different phases of the life cycle (for example, while requirements related to the planning of mine closure may be assessed even during the construction phase, effective implementation of those requirements cannot be assessed until closure is under way or completed).

Historic mines and mining operations

IRMA seeks to make its system available to any proposed or existing mining or mineral processing operation that is committed to improving environmental and social responsibility, using the Standard's principles and objectives as a guide. The fact that an existing operation did not fully comply with all requirements of the IRMA Standard during an early stage of its development should not exclude it from assessment, nor from reaching higher levels of achievement in IRMA's scoring system.

Artisanal and small-scale mining operations

While artisanal and small-scale mining (ASM) is not in the scope of the IRMA Standard 2.0, we do have a chapter in the Standard that has requirements for large-scale mines who interact with, or have the potential to interact with, artisanal and small-scale mining due to proximity or through commercial relationships such as sourcing ore or minerals from these smaller entities. The chapter focuses on fostering positive relationships between large-scale mines and ASM and to support the development of ASM that provides positive livelihood opportunities and that is protective of human rights, health, safety and the environment.

Adaptation – IRMA CoC Standard

The IRMA CoC Standard will, as needed, be supplemented by Appendices specifying normative requirements and/or guidance for specific mineral supply chains. The latest version of the draft IRMA CoC Standard includes normative guidance in Appendix 1 for graphite, iron, lithium, nickel, and platinum group metals. Although recycled materials are not presently available for IRMA certification, they are an important part of the metals supply chain; Appendix 1 also contains normative

guidance for recycled materials accounting when mixed with IRMA achieving materials.

Standard-Setting and Revision Process

6. When standard was first written and by whom IRMA Standard 2.0

Version 1.0 of the IRMA Standard was written by the IRMA Secretariat and released in 2018 after a robust public consultation process that took place in 2014 and again in 2016 that resulted in more than 2,100 comments and recommendations that informed its content. The 2018 release of version 1.0 also was based on two field tests of the Standard, in Zimbabwe and in the United States.

The IRMA Standard 2.0 is being developed by the IRMA Secretariat through a similar, although shorter, public consultation process that seeks to engage diverse stakeholders and Indigenous rights holders around the world. In preparing for this review and revision process, more than 20 different companies have already been piloting the draft requirements for exploration and development and also for mineral processing. Several others have been assisting with testing the draft expectations in a new draft Chain of Custody Standard that will support verification of responsible sourcing claims, from mine to end product. In addition, 139 diverse experts from 23 countries have engaged in 10 topical working groups to provide suggestions to inform and catalyze this revision process that now opens for broad public review and input.

IRMA CoC Standard

IRMA released an initial draft CoC standard in 2020 for public review and comment.

A revised draft was published in October 2023, in order to respond to comments on the 2020 version, including the addition of controlled blending and book-and-claim accounting models to align with practical realities of complex supply chains. The revised draft also includes expanded normative guidance, including examples of supply chains for multiple materials that have or are currently undergoing independent third-party IRMA audits.

7. Stakeholder categorization and geography IRMA Standard 2.0

IRMA identified stakeholders in six core sectors for outreach when developing the Standard. Those groups are:

- Mining industry (mines, exploration projects, mineral processing activities)
 with a focus on those companies who had expressed some interest in corporate social responsibility, improve practices, sustainability, etc.
- 2. **Downstream purchasing companies** across key sectors such as automotive, jewelry, high-tech, energy, infrastructures; with a renewed emphasis on companies affected by or participating in the low-carbon energy transition.
- 3. **Mining-affected communities** both with formal organizational representatives and those underserved but likely affected by mining, including both local and indigenous peoples.
- 4. **Non-governmental organizations** both environmental and social/human rights focus, as well as NGO working in the field of responsible value chains and good governance of mineral resources.
- **5.** Labor unions / Workers a focus on workers at mine sites, exploration fields, and mineral processing facilities, e.g. steel workers, etc.
- **6. Finance / Banking / Investors** with a focus on those institutions who are already engaged in responsible finance, responsible investment and/or impact investment, in particular around mining and mineral value chains issues (including institutions that directly finance or invest exploration, mining, and processing companies or projects).

IRMA identified the key organizations and individuals from these groups around the globe. IRMA also identified other stakeholder groups that may be interested in the IRMA standard including governmental entities, corporate responsibility consultants; academics who work on mining; individuals and organizations with expertise in standard-setting/certification systems; and insurance companies. Outreach is done in a range of formats: web site announcements and downloads, press releases, enewsletters, one-on-one outreach within a stakeholder group (e.g. mine to mine), webinar series with 12 hour time zone difference repeats to cover all parts of the globe, in-person workshops, and phone calls. For the development of the standard launched in June 2018, a total of more than 100 organizations gave input, and more than 1,400 comments were collected and responded to. For the development of the

IRMA Standard 2.0, it is hoped to engage with at least as many commentors and contributors, from an even wider and more diverse audience.

IRMA CoC Standard

IRMA identified stakeholders in seven core sectors for outreach when developing the CoC Standard. Those groups are:

- 1. **Downstream purchasing companies** across key sectors such as automotive, jewelry, high-tech, energy, infrastructures; especially for public-facing brands and companies.
- 2. **Supply chain actors** such as commodity traders, brokers, and intermediaries.
- 3. **Mining industry (mines, mineral processing activities)** with a focus on those companies who had expressed some interest in corporate social responsibility, improve practices, sustainability, etc.
- 4. **End-users and consumer associations** as everyday clients for the end-products sold or provided by companies seeking to assure their Chain of Custody.
- 5. **Mining-affected communities** both with formal organizational representatives and those underserved but likely affected by mining, including both local and indigenous peoples.
- 6. **Non-governmental organizations** both environmental and social/human rights focus, as well as NGO working in the field of responsible value chains and good governance of mineral resources.
- **7. Finance / Banking / Investors** with a focus on those institutions who are already engaged in responsible finance, responsible investment and/or impact investment, in particular around mining and mineral value chains issues.

Similar to the Standard 2.0, IRMA identified the key organizations and individuals from these groups around the globe for the development of the *IRMA CoC Standard*, as well as additional stakeholder groups, and conducted outreach in a variety of formats.

8. Summary of the revision process

The IRMA Standard 2.0 will be revised at least every five years (first revision: 2023; next date: 2028).

For the IRMA CoC Standard, once finalized it will also be revised at least every five years (next tentative date: 2029).

IRMA's Standards Development Procedure requires that within five years after the approval date of the IRMA Standard for Responsible Mining (or five years of any substantive revisions to the approved standard) IRMA shall carry out a formal, publicized comment period of sixty days. However, as world events happen, society's expectations and best practices evolve, the Standard can be partially revised or have some addenda added into the chapters as we learn and improve the standard in real time. For example, when the Brazil mine tailings disaster occurred in January 2019, IRMA re-convened the committee for that chapter (waste and materials management) to re-assess the criteria considering the tragedy and what was being learned at the time. For the 2023 revision process, a period of ninety days is provided, given the integration of three standards into one, and to accommodate holiday seasons across different regions and continents.

IRMA will continue to offer a range of ways to reach stakeholders including electronic newsletters, direct one-to-one emails, phone calls, web site announcements, webinars and in-person workshops. We will proactively approach disadvantaged stakeholders, with a focus on underserved mining-affected communities and Indigenous Peoples

9. Equitable governance

IRMA's multistakeholder Board of Directors is made up of two seats each in the following categories 1) NGOs, 2) labor unions, 3) mining-affected communities, 4) mining companies, 5) companies who purchase mined materials, and 6) companies who finance and invest in the mining sector (at company or project level). The <u>current Board composition</u> can be found on our web site. IRMA is the only mining standard with equal governing authority for each individual sector.

Each sector has equal voting power, and no single organization, company, or stakeholder sector has authority to make decisions on IRMA Standards that do not work for other stakeholder groups. Our governance structure makes IRMA unique as most standards for mining are governed predominantly or exclusively by mining companies.

10. Decision-making process

Decisions to approve the release of the draft of the IRMA Standards for public consultation has been made by the IRMA multistakeholder Board of Directors. Decisions to approve a final version of the IRMA Standards will be made by the IRMA Board of Directors. Decision-making does and will follow IRMA Bylaws.

On completion of the final period for public consultation the IRMA, and after submission of a report by the IRMA secretariat to the IRMA Board of Directors, the IRMA Board of Directors shall:

- a) approve and adopt the standard if it affirms that the standard development process was adequate and the standard is consistent with the specifications that the IRMA Board of Directors approved when the standard development or revision process was initiated; or
- b) not approve the standard if it deems otherwise.

If the new standard or revised standard receives the approval of the IRMA Board of Directors, the standard shall be published within 30 days on the IRMA website. Details of the standard effective dates and transition periods¹, where applicable, will be included in the published standard.

11. Review and Revision process

Comments, complaints and concerns can also be received anytime by sending inputs to <u>info@responsiblemining.net</u> or via the web site <u>here</u>.

Specific comments to the IRMA Standard 2.0 can also be sent to comments@responsiblemining.net

¹ Transition periods are a period of time during which users of a standard must transition from a previous version to the most recent version of the standard. Transition periods will take into account existing certification cycles to ensure a smooth transition.