



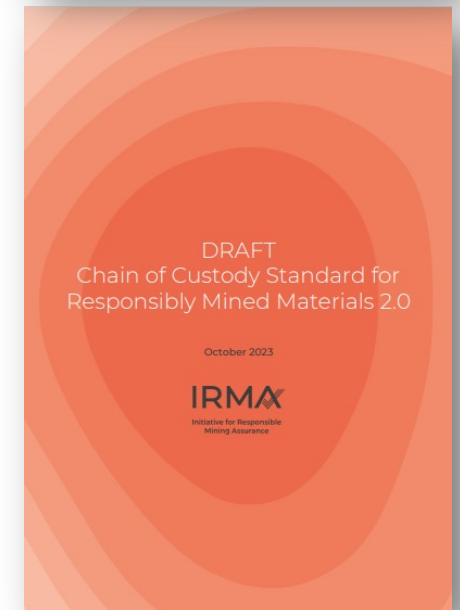
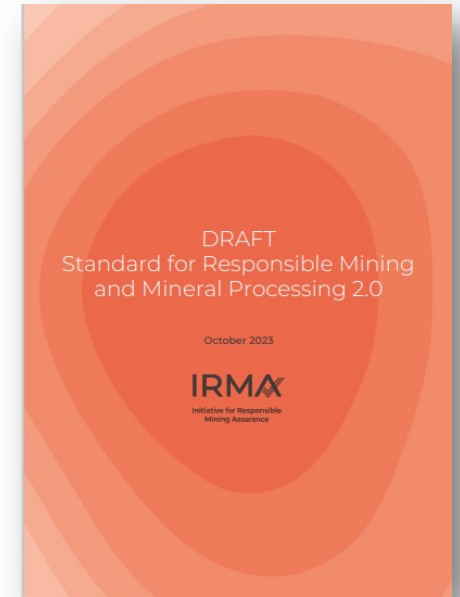
IRMA Standard Revision

Stakeholder Feedback Webinar

Live consultation for Mining Companies

Reason For today's **Live consultation**

- IRMA released in October 2023 two important draft standards for public comment:
 - Draft Standard for Responsible Mining and Mineral Processing V2.0
 - Draft Chain of Custody Standard 2.0
- Between Dec 2023 and Jan 2024, IRMA is hosting a series of live consultations as one of the many ways for stakeholders to contribute to the revision process
- These live consultations address either specific topics/chapters or types of projects and operations



1. House rules

- This event is hosted by **IRMA, the Initiative for Responsible Mining Assurance.**
- This event is being recorded and the recording will be made publicly available on the IRMA website.
- Participants may not post any unlawful, offensive, threatening, libelous, defamatory, obscene or otherwise objectionable content.
- Participants may not post, or send, or link to hateful, degrading, criminal or sensitive imagery or content, or to any content or material that violates laws, violates third party's privacy rights, advocates intolerance or hate against other people on the basis of actual or perceived ethnicity, national origin, caste, sexual orientation, gender, gender identity, religious affiliation, age, disability, or disease.
- Participants may not post or send or link to Spam content or mass unsolicited or aggressive activity that attempts to drive traffic or attention to unrelated accounts, products, services, or initiatives.

2. Ways to contribute today

- This event represents one of the many opportunities and channels available to contribute to the IRMA Standard Revision Process (incl. a dedicated online platform: www.responsiblemining.net/comments2)

Chat function

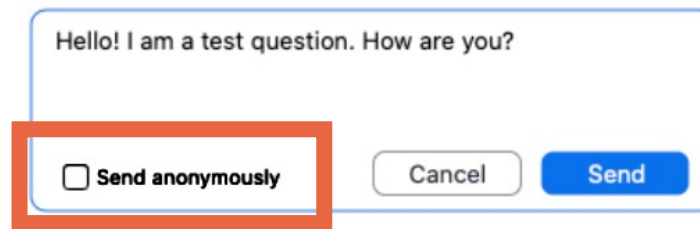
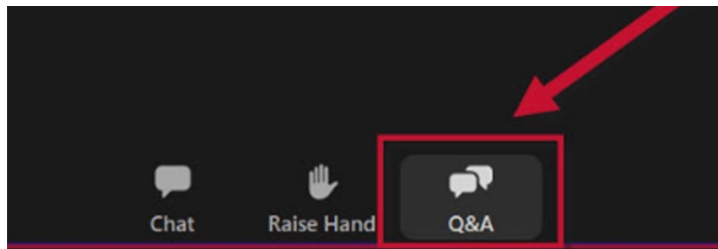
- Participants can also use the Chat function of zoom to share content with the whole audience
- Please note that the chat cannot be used in an anonymous way

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Q&A function

- Participants can use the Q&A function of zoom to submit any comment, suggestion, feedback, question, concern, recommendation to IRMA.
- Participants can decide to submit content via the Q&A function in an **anonymous** way

A screenshot of the Zoom Q&A submission form. It shows a text input field with the text 'Hello! I am a test question. How are you?'. Below the input field, there is a checkbox labeled 'Send anonymously' which is highlighted with an orange rectangular box. To the right of the checkbox are two buttons: 'Cancel' and 'Send'.

2. Ways to contribute today

- This event represents one of the many opportunities and channels available to contribute to the IRMA Standard Revision Process (incl. a dedicated online platform: www.responsiblemining.net/comments2)

=> All content shared with us today will be saved and considered by IRMA as part of the Standard revision process

3. What is IRMA?

A voluntary assessment and verification system for large-scale mines



1. The IRMA Standard for Responsible Mining

- **Best practice** requirements on 26 topics – a comprehensive and rigorous mining standard
- Standard was developed through a robust **equally-governed multi-stakeholder** process

2. A third-party, independent Assurance System

- Auditors external to the mining company evaluate whether a mine is meeting the IRMA requirements
- The **audits include site visits** and **input from rights holders**, mine workers and stakeholders

IRMA's system is unique in hosting a standard and a performance verification system
governed by six houses
with equal voting rights (and veto power).

A house cannot be left behind in decisions.

Mining	Purchasing	NGOs	Organized Labor	Affected Communities	Investors and Finance
Jon Samuel (Anglo American)	Claudia Becker (BMW.)	Payal Sampat (Earthworks)	Meg Gingrich (United Steelworkers)	Pavel Sulyandziga (Batani Fund)	Ashley Hamilton Claxton (Royal London Asset Management)
Grace Barasso (ArcelorMittal)	J.J. Messner de Latour (Microsoft)	Jim Wormington (Human Rights Watch)	Glen Mpufane (IndustriALL Global Union)	Meschack Mbangula (Mining Affected Communities United in Action, South Africa)	Jamie Bonham (NEI Investments)

Business Integrity

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

Social Responsibility

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

Planning for Positive Legacies

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

Environmental Responsibility

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

4. IRMA revision process

A comprehensive revision of our standards allows us to:



Ensure our system **remains accountable** to all sectors and is aligned with our mission and vision



Remain up-to-date: Reflect the latest scientific understanding in our standard; learning from other standards, policies, laws



Add clarity: Make the standard clearer, more accessible for all stakeholders; learning from first audits



Add consistency: Better align the structure and flow of chapters that are similar; embedding good management systems practice and models



Fill gaps: Address the most significant environmental and social issues

Holistic and integrated approach

IRMA is evolving to address key phases of the mineral supply chain.

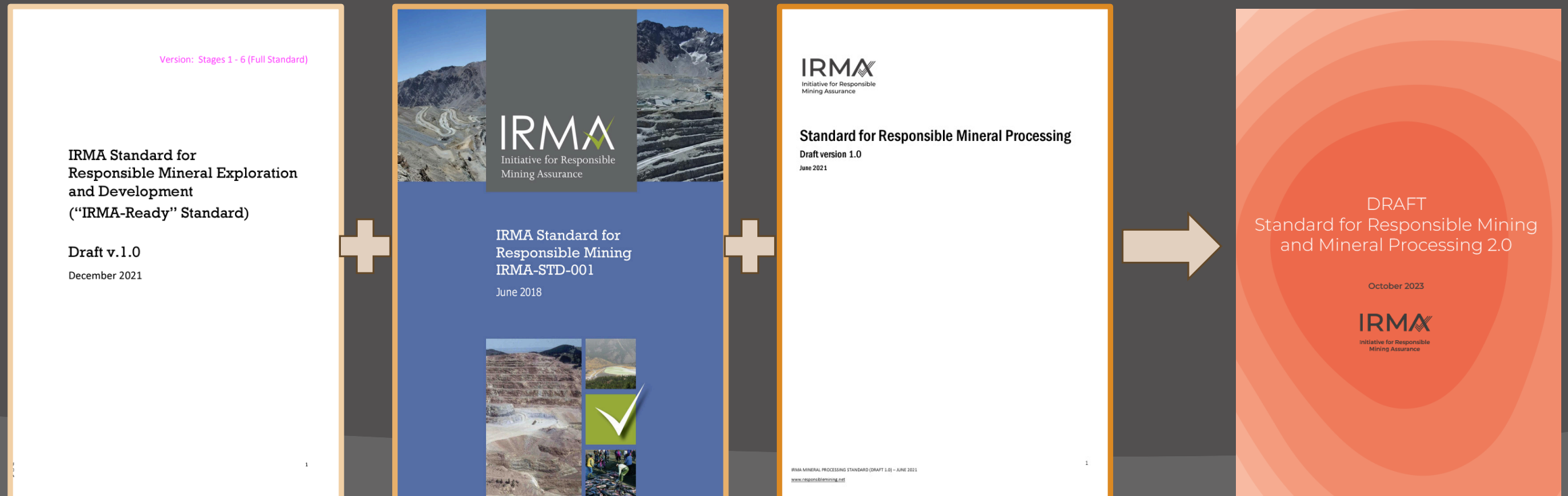
■ Mining



Holistic and integrated approach

IRMA is evolving to address key phases of the mineral supply chain.

- Exploration & Development
- Mining
- Mineral processing



What is in the new consultation draft?

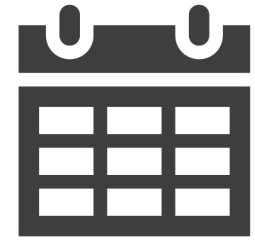
- **Transmittal Letter:** **Not Board approved**; invitation for comments on all content; reflection of IRMA principles (best practice, sound science, efficiency, equal stakeholder value, etc.), the context for proposed changes and questions
- **Drafters' Notes:** Indicate divergence with the 2018 Mining Standard, why the change is being proposed.
 - **NOTES** at the beginning of each chapter (summary of changes proposed)
 - **NOTES** under requirements that are proposed to change and why (e.g., previous requirement wording was unclear, or we had a gap with other standards, international norms, regulatory bodies. Indicates **NEW** or **REVISED** or unchanged.)
 - **CONSULTATION QUESTIONS** lay out the challenging issues that have been raised and ask for feedback to help resolve them
- An **Excel version**, as some prefer to read and comment back in Excel. It contained consultation questions and NOTES.

Consultation draft informed by:

- Experiences from initial IRMA audits
- Review of other standards
- Increased public awareness and evolving expectations of best practice
- Review of emerging issues garnering international discussions
- Comments on DRAFT IRMA-Ready and **Mineral Processing**
- Ongoing input from stakeholders on particular content
- Expert working group discussions

Public Consultation period is open

From Oct 26 – Jan 26: **90 days**



End date:
January 26, 2024

Online platform

<https://www.responsiblemining.net/comments2>

Other channels

- Via email

comments@responsiblemining.net

- Via WhatsApp

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- Via postal mail to: IRMA Std Comments; 113 Cherry St, #74985; Seattle, Washington, 98104; USA

5. Proposed changes

Structural changes to the Standard

- Integrated 3 standards, which required changes in some terms
(e.g., *operating company* is now **entity**; *mine site* is now **project** or **operation** depending on stage of development)
- Reorganization of content to have a consistent flow in similar chapters
- More clarity where there are multiple sub-requirements
- Filling gaps where certain elements were overlooked
(e.g., some chapters required assessment of risks/impacts, but didn't require a management plan outlining how impacts were to be mitigated/managed)
- More consistency on terminology and on similar criteria
- Removed language referring to **new mines** vs. **existing mines** => **'entities'**
that distinction made auditing challenging, and produced inconsistent expectations for different sites
(based solely on the date they came into operation)

Proposed new Chapters

- **Gender Equality & Gender Protections**

To achieve and maintain gender equality, gender mainstreaming, and gender protections in the workplace and communities where mining and mineral processing takes place.

- **Management of Physical Stability**

To manage wastes, materials and facilities in a manner that minimizes their short- and long-term physical risks, and protects workers as well as the human rights, health and safety of communities and future land and water uses.

- **Land and Soil Management**

To prevent contamination, mitigate and remediate soil pollution, and address degradation of land and soil to enable current and future beneficial uses of soil and land resources.

- **Mineral Supply Chain and Responsible Sourcing**

Applicable only to Mineral Processing: processing operations know and engage with suppliers, and increasingly source input materials from suppliers that have strong environmental, social and governance performance.

Consolidated Chapters

- **Cyanide and Mercury Management**

are now integrated within existing chapters, especially **Waste, Materials, Water, and Air Quality** management

Draft Standard 2.0: Proposed Changes (summary)

Business Integrity

Legal Compliance

- System to identify and track compliance
- Provision of regulatory compliance information to stakeholders included in policy
- *More details on contractor compliance*

Gender Equality & Gender Protections

NEW

- Gender policy
- Assessment of gender-related risks and opportunities
- Management plan to address issues and opportunities
- Monitoring of progress
- Reporting on progress

Stakeholder Engagement

- "Access to information" policy
- Informing stakeholders that they can request and obtain information (VS 'upon request' requirements)
- Mapping + Analysis VS identification
- *Strengthened engagement plan + gender analysis*

Grievance Mechanism and Access to Remedy

- Staff training (VS information)
- *Clarification on reporting (to complainants + stakeholders in general)*
- *Clarification on scope*

Financial Transparency and Anti-Corruption

(*name changed* from 'Revenue and Payments Transparency')

- Communication of procedures
- Reporting on bribery and corruption
- *More detail on anti-corruption procedures.*

Human Rights Due Diligence

- Management plan
- Effectiveness review

Mineral Supply Chain & Responsible Sourcing

- Not yet opened for public comment
- Expert Group to be convened

Draft Standard 2.0: Proposed Changes (summary)

Planning for Positive Legacies

ESIA and Management

- Exploration-specific criteria
- Gap analysis between IRMA and government requirements (if any)
- Nature-based solutions
- Circularity
- Climate change and adaptation
- *Stakeholder engagement consolidated throughout*

Community Support & Delivering Benefits

- Procurement policy
- Support for local suppliers and businesses needs to be evidenced

Indigenous Peoples and FPIC

(name changed from 'FPIC')

- Remediating past (or present) impacts on Indigenous Peoples
- Indigenous Peoples' Development Plan
- Specific grievance mechanism
- *Clarification on the rights of uncontacted peoples*
- *Clarification on FPIC or remedy agreements, and community approval*

Community Emergency Preparedness and Response

(name changed from 'Emergency Preparedness and Response')

- Specific requirements to VS general reference to UN APELL
- *Worker-related emergency response moved to H&S*

Land Acquisition, Displacement, and Resettlement

- Documenting circumstances of past land acquisition and displacement
- Assess and remedy for past impacts related to historical resettlement
- Gender equity
- Avoidance of temporary displacement
- *Clarification on voluntary displacement*

Planning and Financing Reclamation and Closure

- *Clarification where no gov' assurance mechanism*
- Concurrent reclamation
- *Closure and post-closure consolidated*
- *Extensive restructuration to consolidate chapter*

Draft Standard 2.0: Proposed Changes (summary)

Social Responsibility

Fair Labor and Terms of Work

- Policies on Child & Forced Labor
- Anti-harassment
- Training on more procedures
- *Clarification on whistleblowers*
- *Clarification on retrenchment planning*
- *Consolidated freedom of association and collective bargaining*

Conflict-Affected and High-Risk Area Due Diligence

(*name changed* from 'Mining and Conflict-Affected or High-Risk Areas')

- Revision to align with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Occupational Health and Safety

- 16 more requirements to reflect 2022 ILO Convention's resolution to include a safe and healthy working environment as its 5th principle (incl. Policies, senior accountability, contractor management, reporting procedures, training, housing, reporting)
- *Clarification on covid/diseases*

Cultural Heritage

- Cultural heritage due diligence
- Assessment and remediation plan if past impacts are found
- Effectiveness review of mitigation measures
- *Consolidated mitigation expectations and requirements*
- *Requirement related to uncontacted peoples moved to Principle 2*

Community Health and Safety

- Baseline data
- Monitoring and evaluation
- Periodic updates
- *Clarification on health surveillance*

Security Arrangements

- *Clarification on security risk + risks from security*
- *Consolidated management plan and monitoring*

Artisanal and Small-Scale Mining

- *Enhancements for entities that source from ASM*

Draft Standard 2.0: Proposed Changes (summary)

Environmental Responsibility

Waste and Materials Mgmt.

- Broader scope (beyond tailings and waste rock)
- *Enhanced documentation, identification and mitigation, as well as storage and transportation*
- *Integrate some Cyanide and Mercury criteria*

Biodiversity, Ecosystem services and Protected Areas

- Separated out some biodiversity/ecosystems/protected areas
- Specific references to fungi
- *Structural changes and additions to increase consistency*

Water Management

- Liquids/brines contaminant analysis
- Enhanced concepts like conceptual site models and water balance
- *Clarification on sequence and language*
- *Revised data reporting*
- *Integrate some Cyanide and Mercury criteria*

Air Quality

- New step to characterize air emission sources
- Operation of air emissions control equipment
- Emergency situations
- Integrate some Cyanide and Mercury criteria

Land and Soil Management

NEW

- Requirements from the 1st Mineral Processing draft
- *Similar flow to the Water Management chapter*

GHG and Energy Consumption

- Energy measurement
- Emission and energy reduction targets + renewables targets (both absolute and relative)
- Scope 3 emissions
- Third-party verification
- Criteria for carbon offsets (when applicable)
- Effectiveness tracking

Mgmt. of Physical Stability

NEW

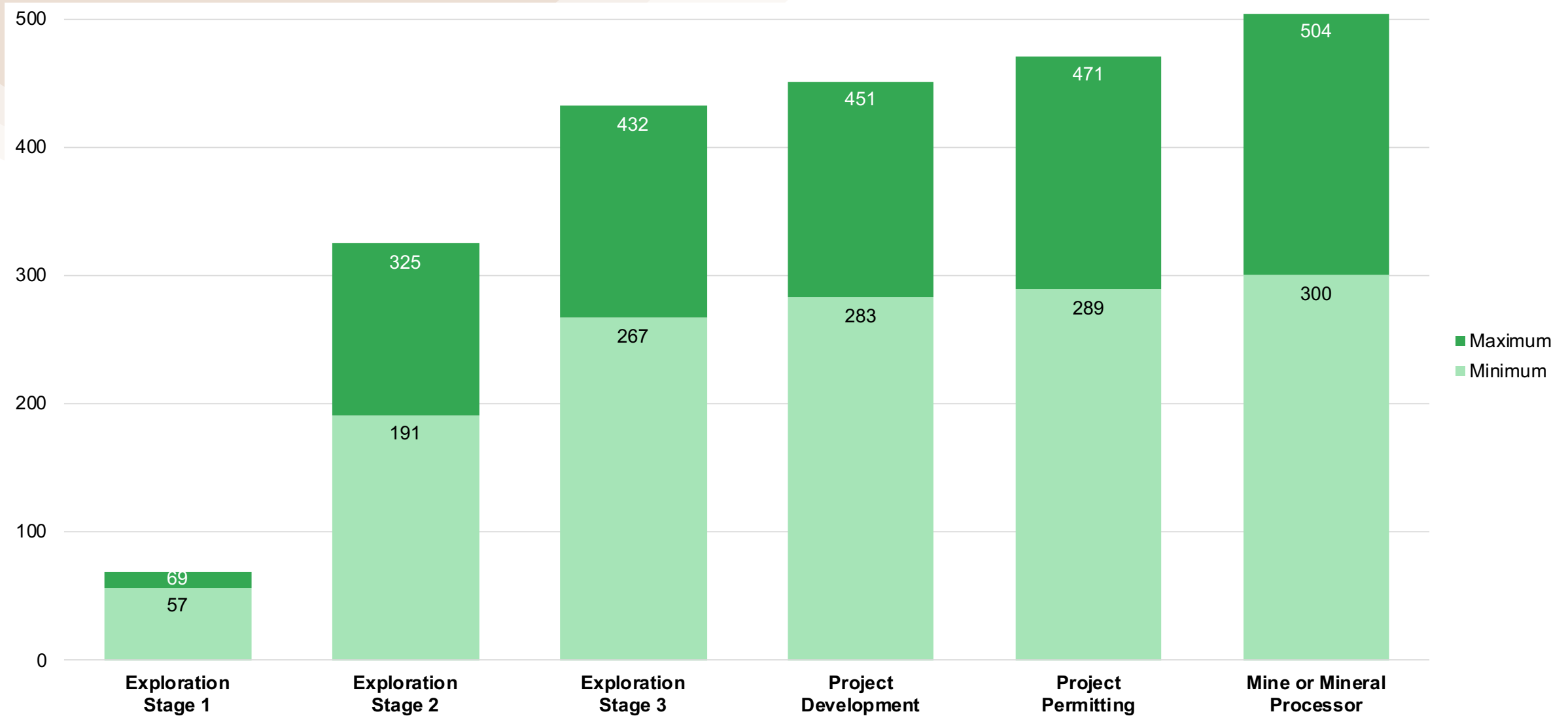
- *Physical stability of: waste facilities (e.g., tailings, waste rock); other major facilities (e.g., water dams, large brine ponds, etc.); pits highwalls and ground*
- *Consequence-based risk assessment*
- *Best practice mitigation and design criteria*
- *Enhanced requirements for high-risk/critical facilities*

Noise and Vibration

- Scoping step
- Scoping of noise impacts on wildlife
- *Consolidated management plan*

Number of IRMA requirements applicable per stage

from Minimum (all exemptions granted) to Maximum (no exemption scenario)



How decisions
will be made?

Decisions will be made
Through equitable
Multi-stakeholder governance

Decisions about changes and improvements made to the IRMA standard will be taken by our **equally-governed multi-stakeholder Board of Directors**

The IRMA Board ensures that decisions:

- 1) Consider the **views of all relevant stakeholders**
- 2) Follow a **clear and comprehensive public consultation** process
- 3) Are **in line with the IRMA mission** and vision

Next steps for final draft review

- Pending Responsible Sourcing chapter will be informed in coming weeks by expert working group then revised and released for public consultation for at least 30 days
- Full standard will be revised, integrating public feedback
(if changes are substantive or if unresolved issues remain, a second round of public consultation will occur)
- Public report with a summary of all comments and recommendations, and proposed way to address/integrate them

Preparing Entities and Audit Firms From V.1 to V.2

PROPOSED DRAFT Transition Plan

Managing the Process

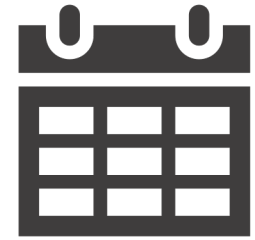
- Final V.2 Standard, once finalized and adopted, will trigger **transition period**
 - **Already engaged sites** = may choose V.1 or V.2 for assessments planned during transition period
 - **New participants** = measured against V.2
 - Audits underway to V.1 to be **completed within timeframe (TBD)**
- After transition period, all audits will use V.2
- Version will be identified on IRMA website and on verification statements

Supporting the Process

- Draft V.2 tools include **spreadsheet crosswalk** and **guidance notes**
- **MineMeasure will transition**
self-assessment data from V.1 to V.2
- **Auditor/site re-training**
- **Stakeholder info sessions**
(purchasers, communities, etc)

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