IRMA

Initiative for Responsible Mining Assurance

EXCERPT FROM THE

IRMA Standard

for

Responsible Exploration, Extraction, and Processing of Minerals

⤳ 2nd DRAFT ⤲

for public consultation

IRMA Standard v2.0 DRAFT 2

July 2025

English Version

Disclaimer and Context on this Draft

The 2nd DRAFT Version of the IRMA Standard for Responsible Exploration, Extraction, and Processing of Minerals V2.0 (hereafter referred to as the "2nd DRAFT") is being released for public consultation, inviting the world to join once again in a conversation around expectations that drive value for greater environmental and social responsibility in mining and mineral processing.

The 2nd DRAFT does not represent content that has yet been formally endorsed by IRMA's equally-governed multi-stakeholder Board of Directors. IRMA's Board leaders seek the wisdom and guidance of all readers to inform this through an inclusive revision process one more time, to improve the Standard.

This draft document builds on the 1st DRAFT Version published in October 2023, and invites a global conversation to improve and update the 2018 IRMA Standard for Responsible Mining V1.0. This 2nd DRAFT is intended to provide as final of a look-and-feel as possible, although input from this consultation will result in final edits, and consolidation to reduce overall number of requirements (more on this on page 6), for a version that will be presented to IRMA's equally-governed multi-stakeholder Board of Directors for adoption and implementation.

This 2nd DRAFT has been prepared and updated by the IRMA Secretariat based on:

- learnings from the implementation of the current IRMA Standard (V1.0)
- experience from the first mines independently audited (as of July 2025, 24 sites have completed audits or are in the process of being audited)
- evolving expectations for best practices in mining to reduce harm
- comments and recommendations received from stakeholders and Indigenous rights-holders
- the input of subject-specific Expert Working Groups convened by IRMA between 2022 and 2024
- all comments and contributions received during the public-comment period of the 1st DRAFT version (October 2023-March 2024)

Please note that Expert Working Groups were created to catalyze suggestions for solutions on issues we knew most needed attention in this update process. They were not tasked to come to consensus nor make formal recommendations. Their expertise has made this consultation document wiser and more focused, but work still lies ahead to resolve challenging issues. We encourage all readers to share perspectives to improve how the IRMA system can serve as a tool to promote greater environmental and social responsibility, and create value for improved practices, where exploration, extraction, and processing of minerals happens.

IRMA is dedicated to a participatory process including public consultation with a wide range of affected people globally and seeks feedback, comments, questions, and recommendations for improvement of this Standard. IRMA believes that diverse participation and input is a crucial and determining factor in the effectiveness of a Standard that is used to improve environmental and social performance in a sector. To this end, every submission received will be reviewed and considered.

This current 2nd DRAFT is based on content already in practice in the IRMA Standard for Responsible Mining V1.0 (2018) for mines in production, and its accompanying normative Guidance document and Supplementary Guidance, combined with the content drafted in the IRMA Standard for Responsible Mineral Development and Exploration ('IRMA-Ready' Standard – Draft v1.0 December 2021) and in the IRMA Standard for Responsible Minerals Processing (Draft v1.0 June 2021), and offers an updated version of the 1st DRAFT Version of the IRMA Standard V2.0 that received over 2,500 unique points of comments between 2023 and 2024.

Please note: The IRMA Standard V2.0 is new in its approach in that it now covers more phases of the mining and mineral supply chain, from exploration and development, through mining, closure, and mineral processing. IRMA also, separately, oversees a Chain of Custody Standard for tracking materials through the supply chain from mine-to-market end use products.

Disclaimer on Language and Corrections

For this public consultation, only an English version is available. A Glossary of Terms used in this Standard is provided at the end of the full version of the document (see below). IRMA reserves the right to publish corrigenda on its web page, and readers of this document should consult the corresponding web page for corrections or clarifications.

This document provides only one chapter excerpt from the IRMA Standard v2.0 DRAFT 2.

The full version contains 27 Chapters, click here to view it.

Objectives of this 2nd public consultation

Following the release of a 1st DRAFT of the IRMA Standard V2.0 in October 2023 for a 90-day public consultation, the IRMA Secretariat received more than 2,500 points of comments from 82 organizations, then organized additional engagement with stakeholders and Indigenous rights-holders, and solicited complementary guidance from multiple topic-specific Expert Working Groups.

We anticipated release of this 2nd DRAFT for a second round of public consultation as early as Q3 2024, then subsequently announced that more time was needed to support engagement of diverse stakeholders; the revised release date was July 2025. We provided more detailed explanation for the extended process here and here.

IRMA Mining Standard: a journey

2012/2013	2014	2015/2016	2018	2019/2020	2021	2022	2023/2024	2025

Zero Draft
- ☑ Literature review
- ☑ Workshops

1st Draft Standard V1
- ☑ Global survey
- ☑ Public Consultation

Pilots, and 2nd Draft Standard V1
- ☑ **Pilots** in USA & Zimbabwe
- ☑ Public Consultation
- ☑ Expert WGs

Approval and launch of IRMA Standard V1.0
- ☑ in force

Pilots, and First audit report
- ☑ **Unki** report
- ☑ Community workshops

Draft Standards for Exploration (IRMA-Ready) & Mineral Processing
- ☑ Public Consultation

Expert Working Groups
- ☑ 10 topics
- ☑ Informed review and new draft

1st Draft Standard V2.0
- ☑ Public consultation
- ☑ Expert Working Groups
- ☑ Indigenous roundtable

2nd Draft Standard V2.0
- ☐ Public consultation
- ☐ Expert Advisors
- ☐ Cross-stakeholder working group
- ☐ And more

The release of this 2nd DRAFT marks a significant milestone on the road to the revision of the IRMA Standard: this public consultation will be the last of this revision cycle on V2.0.

Informed by the outcomes of this public consultation, along with guidance from Expert Advisors and IRMA Working Groups (see more below), and additional engagement with Indigenous rights-holders and stakeholders as requested, the IRMA Secretariat will prepare a final version. This final version will be discussed by the IRMA Board and refined to reach consensus for adoption by all six governing houses of IRMA: Affected Communities including Indigenous Rightsholders; Environmental and Social NGOs; Organized Labor; Finance and Investment Professionals; Mining Companies; Purchasers of Mined Materials.

In IRMA's strategic decision-making, Board members work to achieve consensus. IRMA believes a majority vote is not a model of equal governance. Instead, any motion that results in both of the two representatives from the same governing house voting "no" must go back to the full group for further discussion. In other words, a proposed course of action cannot proceed if both representatives from one of our six governing houses are opposed. Board members will keep talking until a resolution that works for all groups is found. It is a model that has worked for IRMA for nearly two decades and is fundamental to IRMA's credibility, accountability and service to all six houses of governance.

What is IRMA seeking guidance on?

Comments, feedback, and suggestions are welcome on any aspect of this 2nd DRAFT version (including intent and text of the requirements, endnotes, annexes, format and structure, design, readability, etc.).

IRMA is particularly interested in hearing the views of rights-holders and stakeholders on **the provisions in the Standard that are substantially new compared to the IRMA Standard for Responsible Mining V1.0.** These provisions (requirements or at a sub-requirement level) are highlighted in yellow throughout this Draft, to ensure they are easily identifiable.

We ask readers to assist us in weighing these potential new provisions, and also hold awareness that, prior to adoption of the final version, many of these will be consolidated and reduced in overall number.

Although these new requirements have each been drafted in response to lessons learned, the current state of best practices, emerging expectations, and/or in response to requests and suggestions made during the previous public consultation, collectively they represent substantive increased expectations for both implementing entities and audit firms. The IRMA Board of Directors seeks to ensure that the IRMA Standard, while recognized the world's most rigorous and comprehensive mining standard, continue to welcome and support uptake of newcomer companies engaging from the mineral supply chain around the world.

Thus, in this consultation, we seek guidance from all on **the new provisions that seem most urgent** to be integrated in the final version of the Standard V2.0, so that the revised Standard's expectations are paced at a realistic level to support engagement of mineral operations of a range of sizes, materials and global contexts.

It is important to note that all new requirements and sub-requirements, including those not retained in the final V2.0, will serve as the basis for the ongoing review process once the V2.0 is approved and released by our Board, and will provide fodder for future revisions, when it is decided that a V2.1 or V3.0 is needed.

Chapter 1.2
Community and Stakeholder Engagement

SECOND DRAFT (JULY 2025): SUMMARY OF CHANGES

- Removed proposed requirement for an information-sharing policy, and included similar clauses in Section 1.2.3, as well as related monitoring requirements (1.2.6.2).
- Tweaks to language to incorporate requests for more explicit attention to underserved and/or marginalized people, both direct and indirect stakeholders, inclusion of community representatives.
- Added additional language to clarify and strengthen requirements relating to decision-making structures and the role of communities in determining engagement agendas.
- Ensure identification of (potentially) affected Indigenous Peoples take place upfront within this Chapter (including to help determine whether Chapter 2.2 will be applicable or not) (see 1.2.1.1.d. and e.).
- Added a new sub-requirement to ensure identification of artisanal and small-scale miners and/or mining operations take place upfront within this Chapter (including to help determine whether Chapter 3.5 will be applicable or not) (1.2.1.1.f).
- Strengthened visibility and explicit expectations regarding inclusion of, and accessibility for, affected rights-holders and stakeholders with sensory disability and/or impairment.
- Added language to specify the point at which entities are expected to have begun engagement.
- Major structural changes to increase consistency with other chapters, including inclusion of new requirements related to Monitoring and Evaluation, and Continuous Improvement. Since these tow dimensions were not covered in the Standard V1.0, we suggest adding an 'eye icon" to these two Sections (1.2.6 and 1.2.7).
- Other minor changes to language to ensure consistency or clarity.

RESPONSE TO CONSULTATION QUESTIONS OUTLINED IN FIRST DRAFT

No consultation question for this chapter

BACKGROUND

Industrial mining developments, and mineral processing operations, have the potential to last for decades over their life cycle. Often mines and mineral processing facilities are built in locations where existing communities live, work, and/or depend on the land and other natural resources; in other cases, new communities emerge because of mining or processing activities. Mining and mineral processing projects and operations have the potential to significantly impact the lives of people in those communities. Some changes may be beneficial, for example, through the provision of jobs, or through corporate investment in community development projects. But these projects and operations also have the potential to create adverse impacts and even be a source of social conflict within communities.

Increasingly, mining and mineral processing companies, governments, and financial institutions are recognizing that building strong, lasting relationships with those affected by mining activities can improve the identification and management of risks, as well as the long-term viability of operations.[1]

In line with the Open Data Charter, and consistent with the spirit of the 2018 ECLAC Escazú Agreement and the 1998 UNECE Aarhus Convention, companies can adapt their processes to identify the most appropriate and effective ways to communicate and share information with stakeholders. Timeliness, comprehensiveness, usability, comparability, accessibility, and cultural appropriateness criteria for the sharing of information and data are best defined when identified, and reviewed on a regular basis, in collaboration with stakeholders.

To be meaningful, stakeholder engagement must be proactive, accessible, inclusive, accountable, and transparent. As such, it increases the potential for optimal outcomes for both communities and stakeholders, and mining and mineral processing companies.[2]

KEY REFERENCES

This chapter strongly builds on, or aligns with, the following international or multilateral frameworks, conventions, and guidance:

- UN Guiding Principles on Business and Human Rights, 2011
- UN ECLAC Escazú Agreement, 2018
- UNECE Aarhus Convention, 1998
- International Open Data Charter, 2015

OBJECTIVES OF THIS CHAPTER

To support collaborative and inclusive decision-making processes by enabling community members, individual and collective rights-holders, and other stakeholders to participate in decisions that affect their health, wellbeing, safety, livelihoods, futures, and the environment.

SCOPE OF APPLICATION

This chapter is applicable to all exploration, mining and mineral processing projects and operations. For each requirement, the following colors are displayed in the margin to indicate the phases for which it is required:

E1	Exploration – Stage 1
E2	Exploration – Stage 2
E3	Exploration – Stage 3
D	Project Development and Permitting
M	Operating Mine
P	Operating Mineral Processor

CRITICAL REQUIREMENTS IN THIS CHAPTER

Throughout the Standard, critical requirements are identified using a red frame.
There is one (1) **critical requirement** in this Chapter.

OPTIONAL IRMA+ REQUIREMENTS IN THIS CHAPTER

Throughout the Standard, optional IRMA+ requirements are identified using a dotted blue frame. There is no (0) optional IRMA+ requirement in this Chapter.

> In this second draft, IRMA introduces a new category of requirements: IRMA+. These requirements are aspirational and forward-looking. They reflect emerging expectations and recommendations from stakeholders, but currently go above and beyond existing and established best practice. IRMA+ requirements are entirely optional, and they will not affect the scores and achievement levels obtained by the entities choosing to be assessed against them.

👁 ISSUES UNDER CLOSE WATCH (EYE ICON)

Monitoring, Evaluation, and Continuous Improvement:
While there is no evidence that requirements related to Monitoring and Evaluation, and the review of performance to feed in continuous improvement, would not be best practice and/or would go above and beyond current best practice, these two dimensions were not covered with regard to Community and Stakeholder Engagement in the IRMA Standard V1.0. Their corresponding requirements (1.2.6.1, 1.2.6.2, and 1.2.7.1) have therefore been signaled with an 'eye icon' to ensure that IRMA closely monitor their relevance, and their implementation as the Standard V2.0 is applied. This is also intended to ensure IRMA will review associated challenges and needed decision more quickly if necessary. Note that these requirements are not 'optional' (unlike IRMA+).

IRMA Requirements

1.2.1   Stakeholder Mapping and Analysis

1.2.1.1   A process has been conducted and documented by competent professionals to identify and map[3] all affected and potentially-affected relevant rights-holders and stakeholders (referred to as "**affected rights-holders and stakeholders**" throughout the Standard), including:

a.   The range of groups and individuals, including community members, rights-holders, representative organizations and institutions, and others, who are or may be directly affected by the site and its associated facilities, including those who may be opposed to the Entity's activities;

b.   Those who are or may be indirectly affected too;

c.   Potentially underserved and/or marginalized people for whom special outreach may be necessary[4];

d.   Whether **Indigenous Peoples** may be affected or potentially-affected, directly or indirectly, by the site and its associated facilities, directly and/or indirectly;

e.   Whether there is more than one **distinct group of Indigenous Peoples**[5];

f.   Whether **Artisanal and/or Small-scale Mining** (ASM) activities are occurring in the project/operation's area of influence[6], and of which form/s[7]; and

g.   <mark>Whether any group or individual identified present sensory disabilities and/or sensory impairment that require specific accessibility measures to ensure meaningful access to communication and information-sharing[8].</mark>

h.   Whether there are **other relevant stakeholders** who are not directly or indirectly affected by the project/operation but are interested in being engaged and having access to information.

1.2.1.2   A process has been conducted and documented by competent professionals to analyze community and stakeholder dynamics, and their implications for the ENTITY's engagement strategy. This process:

a.   Has analyzed the relative interests and influence of each category/group of affected rights-holders and stakeholders with regard to the site and its associated facilities;

b.   Has analyzed <mark>gendered roles</mark> and power dynamics within households and communities;

c.   Has analyzed the implications of these relative interests, influence<mark>, gendered roles</mark>, and power dynamics for inclusive engagement; and

d.   Included evaluation of pre-existing community dynamics[9], to understand if other natural resource-related projects/operations have created oppositions, tensions, and/or divisions, and if the ENTITY's activities may create, or has created, intra-community, inter-community or interpersonal tensions, divisions or conflicts that warrant special engagement strategies.

1.2.2   Engagement Plan

1.2.2.1   The ENTITY has a stakeholder engagement plan (or equivalent) in place, developed by competent professionals, to frame the ENTITY's engagement with <u>affected rights-holders and stakeholders</u>.[10] The plan:

    a.   Is informed by initial engagement with representatives of <u>affected rights-holders and stakeholders</u>, and other key local representatives;[11]

    b.   Identifies a timetable of engagement activities, and the purposes or goals for each engagement;

    c.   Identifies how engagements will capture input from a diversity of <u>affected rights-holders and stakeholders</u>;

    d.   It includes specific measures to facilitate inclusion of people of different genders, ages, ethnicities, and <mark>sensory issues</mark>; and

    e.   It includes specific measures to facilitate inclusion of any potentially underserved and/or marginalized people[12].

1.2.2.2   The stakeholder engagement plan:

    a.   <mark>Identifies how engagement processes will avoid or minimize conflicts within and between <u>affected rights-holders and stakeholders</u> that are being engaged.</mark>

    b.   <mark>Identifies how monitoring and evaluation of effectiveness of engagement with <u>affected rights-holders and stakeholders</u> will occur, and the qualitative and quantitative indicators to be used;</mark>

    c.   <mark>It includes documentation of a budget and staff responsibilities for effectively implementing the various engagement activities</mark>

1.2.3 Processes for Sharing Information

E2 E3 D M P

1.2.3.1 Building on 1.2.1, the stakeholder engagement plan that is in place (required in 1.2.2) identifies, in collaboration with affected rights-holders and stakeholders:

a. How, when and in what formats relevant information[13] will be shared with them to ensure that communications and information-sharing with affected rights-holders and stakeholders occurs in a manner that is deemed meaningful and usable by them, including to people who present sensory disabilities and/or sensory impairment[14];

b. Also in a manner that is deemed culturally appropriate and easily accessible by affected rights-holders and stakeholders[15]; and

c. Also in a manner that is deemed timely by affected rights-holders and stakeholders[16]. When information cannot be shared in a timely manner, the ENTITY systematically provides affected rights-holders and stakeholders with a documented justification or explanation for the delay.

E2 E3 D M P

1.2.3.2 The stakeholder engagement plan that is in place (required in 1.2.2) ensures that:

a. Any request from affected rights-holders and stakeholders to obtain information that relates to the site's performance against the IRMA Standard will be met in a timely and effective manner[17];

b. If requests are challenging to fulfill because of the large volume of information requested, the ENTITY will at least[18] provide affected rights-holders and stakeholders with summaries of requested information and a documented justification or explanation for why information is not being provided in full or according to the preferred timeline of the stakeholder[19]; and

c. If a request entails the sharing of document(s) that contain some confidential business information, or information that would violate applicable data privacy or data security laws, the ENTITY will redact only the confidential information, allowing for the release of all the non-confidential information.

1.2.4 Implementation of Stakeholder Engagement Processes

E2 E3 D M P

1.2.4.1 **Critical Requirement**
The ENTITY has a system in place to foster two-way dialogue and meaningful engagement with affected rights-holders and stakeholders. This system includes a process (or processes) to:

a. Provide affected rights-holders and stakeholders with opportunities to contribute to engagement agendas and add topics of concern into engagement planning[20];

b. Provide relevant information to affected rights-holders and stakeholders, including advance notice of proposed activities, in accordance with 1.2.3; and

c. Engage affected rights-holders and stakeholders in a manner that is free from manipulation, interference, coercion, or intimidation[21].

`E2` `E3` `D` `M` `P`

1.2.4.2   This system also includes a process (or processes) to:

a.   Clearly define decision-making structures and authorities amongst both ENTITY and affected rights-holders and stakeholders on key topics;

b.   Ensure participation of representatives of affected rights-holders and stakeholders if consultations with them indicate that this as an expectation;

c.   Engage and collaborate with a broad spectrum of affected rights-holders and stakeholders representing a diversity in genders, ages, ethnicities, and any potentially underserved and/or marginalized people[22];

d.   Regularly solicit feedback from affected rights-holders and stakeholders on issues relevant to them;

e.   Include participation by site management and subject-matter experts when addressing concerns of significance to affected rights-holders and stakeholders; and

f.   Engage affected rights-holders and stakeholders on an ongoing basis, from the earliest possible stage[23], and throughout the project/operation life cycle.

`E2` `E3` `D` `M` `P`

1.2.4.3   At least one permanent stakeholder engagement mechanism[24] is in place, as follows:

a.   Is designed to facilitate the participation of affected rights-holders and stakeholders in regular and ongoing review of, input on, and collaborative decision-making on the environmental and social performance of the site and its associated facilities, as well as on other issues relevant to those affected rights-holders and stakeholders [25];

b.   Is designed in collaboration with affected rights-holders and stakeholders;

c.   Is designed in collaboration with a diversity of members and representatives from affected communities[26];

d.   Includes specific mechanisms to facilitate the meaningful participation of potentially underserved and/or marginalized people; and

e.   Ensures that relevant information is preemptively shared with affected rights-holders and stakeholders, in accordance with 1.2.3, for them to make input and contribute to collaborative decision-making in an informed manner.

`E2` `E3` `D` `M` `P`

1.2.4.4   When stakeholder engagement processes depend substantially on community representatives speaking for the community:

a.   Efforts are made by the ENTITY to confirm whether or not such people represent the views and interests of diverse affected community members including underserved and/or marginalized people, and can be relied upon to reliably communicate relevant information between the community and the ENTITY[27];

b.   If either the representatives are not considered to represent the views of the community including underserved and/or marginalized people, or information from the engagement processes are not flowing back to the community, then the ENTITY implements additional engagement processes to enable more meaningful input from and information sharing with the broader community; and

c.   These additional engagement processes identify how their effectiveness will be monitored and evaluated.

E2 E3 D M P

1.2.4.5   Engagement processes are documented, including, at minimum:

a.   Names of participants, unless anonymity requested, <mark>and their affiliations[28] if relevant;</mark>

b.   Input received from rights-holders and stakeholders, <mark>dates of all interactions</mark>, and feedback provided by the ENTITY to them; and

c.   <mark>The documentation process includes safeguards to protect the security and privacy of collected personal data or characteristics of affected rights-holders and stakeholders.</mark>

1.2.5   Strengthening Capacity to Engage

E2 E3 D M P

1.2.5.1   The ENTITY has a system in place to ensure that competent professionals conduct and document consultations with affected rights-holders and stakeholders, at least annually and more frequently if requested by them, to:

a.   Assess their capacity to effectively engage with the ENTITY[29];

b.   Identify and understand potential barriers to participation in engagement processes that exist for different genders, ages, ethnicities, cultures, and linguistic groups; and

c.   Identify and understand potential barriers to participation in engagement processes that exist for any potentially underserved and/or marginalized people[30].

E2 E3 D M P

1.2.5.2   This system ensures that, where barriers to participation or capacity gaps[31] are identified:

a.   The ENTITY offers appropriate assistance to facilitate more effective engagement[32];

b.   The ENTITY and the relevant people or groups mutually agree on strategies to facilitate more effective engagement[33]; and

c.   They also jointly agree on the implementation schedule/s, how implementation and effectiveness will be monitored and evaluated, and a financing plan to ensure that funding is available for effective implementation of these strategies.

👁 1.2.6 Monitoring and Evaluation

E2 E3 D M P

1.2.6.1 To monitor and evaluate the implementation and effectiveness of the stakeholder engagement plan, the ENTITY collaborates with affected rights-holders and stakeholders to, at least annually or more frequently if requested by them:

a. Track and document the implementation progress and effectiveness of stakeholder engagement, over successive time periods, against the timetable, goals and indicators defined as par 1.2.2.1 and 1.2.2.2;

b. Track and document the effectiveness of the strategies implemented to remove barriers and build capacity as per 1.2.5; and

c. The monitoring and evaluation process includes safeguards to protect the security and privacy of collected personal data or characteristics of stakeholders.

E2 E3 D M P

1.2.6.2 The monitoring and evaluation process:

a. Encourages and facilitates joint tracking or joint fact-finding with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, and any potentially underserved and/or marginalized people;

b. Includes continuous stakeholder feedback on the design of engagement processes with regard to the scope of relevant issues covered; and

c. Includes continuous stakeholder feedback on the timeliness, accessibility, inclusiveness, and cultural appropriateness of information-sharing (see 1.2.3.1).

👁 1.2.7 Continuous Improvement

E2 E3 D M P

1.2.7.1 At least annually, or more frequently if requested by affected rights-holders and stakeholders, the ENTITY collaborates with them to:

a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 1.2.6;

b. Review any engagement-related grievances and the functioning of its relevant grievance mechanism/s required in Section 1.4.3;

c. Review the ENTITY's effectiveness in engaging and collaborating with a broad spectrum of affected rights-holders and stakeholders representing a diversity in genders, ages, ethnicities, and members of any potentially underserved and/or marginalized people, as per 1.2.4.2;

d. Develop and implement time-bound corrective measures to update, if necessary[34], the stakeholder mapping and analysis in accordance with Section 1.2.2,

e. Develop and implement time-bound corrective measures to update, if necessary[35], the processes and criteria for sharing information in accordance with Section 1.2.3;

f. Develop and implement time-bound corrective measures to update, if necessary[36], how, the ENTITY engage with stakeholders in accordance with Sections 1.2.2 and 1.2.4; and

g. Develop and implement time-bound corrective measures to update, if necessary[37], the monitoring and evaluation processes, in accordance with Section 1.2.6.

1.2.8   Information-Sharing

E2 E3 D M P

1.2.8.1   The ENTITY proactively shares with affected rights-holders and stakeholders, in accordance with Section 1.2.3, and with due regard for the safety and data privacy of affected rights-holders and stakeholders:

   a. Details about input received during stakeholder engagement processes;

   b. Details about how stakeholder input and concerns were taken into account and addressed by the ENTITY; and

   c. Details about how time-bound corrective measures required in 1.2.7.1 are effectively implemented.

CROSS REFERENCES TO OTHER CHAPTERS

This table will be added when the new content for all chapters is finalized and approved.

CHAPTER ENDNOTES

[1] Herbertson, K., Ballestaeros, A., Goodland, R. and Munilla, I. 2009. Breaking Ground: Engaging Communities In Extractive And Infrastructure Projects. (World Resources Institute). https://www.wri.org/research/breaking-ground

[2] For example, Principle 10 of the Rio Declaration of 1992 states that, "Environmental issues are best handled with the participation of all concerned citizens." (Source: United Nations. 1992. Report of the United Nations Conference on Environment and Development. Annex I. "Rio Declaration on Environment and Development." http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm)

[3] For Exploration projects at Stage 1, this should be done to the greatest extent possible (given the absence of on-site engagement and site visits). Note that in some jurisdictions, community engagement is expected well before the ENTITY can start on-site exploration activities (see also definition of Exploration – Stage 2).

[4] What may constitute 'underserved and/or marginalized people' requiring additional focus depends on the context and the matter at hand. Entities should draw on stakeholder mapping, stakeholder interviews, project documentation, as well as site observations to determine whether all relevant stakeholders have been identified and included. For this requirement, particular attention should be paid to those who are not able or willing to participate without particular considerations/accommodations; this often includes persons with disabilities, socially or geographically marginalized groups, those in a state of poverty, the illiterate, groups for whom local cultural practices deter participation, etc. Additional guidance will be provided in the IRMA Guidance Document.

[5] E.g. nation, population, etc.

[6] Area of Influence (AoI) is required to be determined in Chapter 2.1 – Environmental and Social Impact Assessment and Management (see requirement 2.1.4.1). If not done as required by Chapter 2.1, Entities would be expected to establish the AoI in order to fully meet this requirement.

[7] There are usually five different forms: "traditional, seasonal, permanent co-habitation, shock and influx ASM. Each of these can be legal or illegal or exist in the informal sector. In identifying how to engage with ASM miners, and which approaches and tools to apply, companies should first identify the general form of ASM activity they are engaging with." Source: ASM, CommDev, ICMM, IFC, World Bank (2010) *Working together: How large-scale mining can engage with artisanal and small-scale miners.*

[8] This includes, but is not limited to: DeafBlind, Blind, Deaf and Hard of hearing, chronic pain, mental differences, developmental, intellectual and mobility challenges. To ensure meaningful access to communication and information-sharing, Entities must focus on sensory challenges that require, for example, accessible websites and documents (see document accessibility in the Glossary), sign-language interpreting, real-time captioning.

[9] 'Pre-existing community dynamics' can include, if relevant, analysis of past responses to natural resource development projects, to the extent that they may be informing stakeholder responses to proposed projects and/or have created divisions or tensions in the communities which may be repeated if the Entity does not conduct engagement appropriately, with these tensions in mind.

[10] If Indigenous Peoples are affected by a project/operation, they may be included in an integrated engagement plan that includes all stakeholders and rights-holders and specifically addresses separate engagement with Indigenous Peoples, especially with regard to their specific individual and collective rights, or a standalone engagement plan may be developed for Indigenous Peoples. Either way, engagement with Indigenous Peoples is addressed and verified separately in Chapter 2.2.

[11] The Entity should conduct preliminary engagement with key stakeholder representatives and relevant authorities as appropriate to the context to develop the preliminary plan. Stakeholder engagement is a dynamic process which is required to be adjusted over time. See Sections 1.2.6 (Monitoring and Evaluation) and 1.2.7 (Continuous Improvement).

---

[12] What may constitute 'underserved and/or marginalized people' requiring additional focus depends on the context and the matter at hand. Entities should draw on stakeholder mapping, stakeholder interviews, project documentation, as well as site observations to determine whether all relevant stakeholders have been identified and included. For this requirement, particular attention should be paid to those who are not able or willing to participate without particular considerations/accommodations; this often includes persons with disabilities, socially or geographically marginalized groups, those in a state of poverty, the illiterate, groups for whom local cultural practices deter participation, etc. See also Sections 1.2.4 and 1.2.5 on the specific measures to identify and put in place to increase accessibility and ensure participation of all stakeholders and rights-holders including remote populations (could include translation, transportation, etc.).

[13] This includes information related to: Legal compliance (1.1.4); Stakeholder engagement processes (1.2.4, 1.2.6, 1.2.7, 1.2.8); Human rights due diligence (1.3.3, 1.3.4, 1.3.5, 1.3.6, 1.3.7); Conflict-affected and high-risk area due diligence (1.5.4, 1.5.8); Community grievances and whistleblowers (1.6.1, 1.6.2, 1.6.3, 1.6.4, 1.6.5, 1.6.6); Socio-environmental impact assessment process (2.1.3, 2.1.4, 2.1.6, 2.1.8, 2.1.9, 2.1.10, 2.1.11, 2.1.12); Gender equity, and sexual and gender-based violence (2.3.3, 2.3.4, 2.3.5, 2.3.6, 2.3.8); Community support and benefits (2.4.2, 2.4.3, 2.4.5, 2.4.6); Land acquisition and resettlement (2.5A.2, 2.5A.3, 2.5A.5, 2.5A.6, 2.5A.7, 2.5A.8, 2.5a.9, 2.5A.10, 2.5A.11, 2.5B.2, 2.5B.3, 2.5B.5, 2.5B.6, 2.5B.7, 2.5B.8, 2.5B.9); Emergency preparedness and response (2.6.1, 2.6.2, 2.6.3, 2.6.4, 2.6.7, 2.6.8); Reclamation and closure (2.7.1, 2.7.4, 2.7.5, 2.7.7); Community health and safety (3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6); Security forces (3.4.2, 3.4.3, 3.4.7, 3.4.8, 3.4.9, 3.4.11); Engagement with ASM (3.5.2, 3.5.3); Cultural heritage (3.6.1, 3.6.2, 3.6.3, 3.6.4, 3.6.6, 3.6.7, 3.6.8); Noise and vibration (3.7.3, 3.7.4); Waste and materials management (4.1.1, 4.1.5, 4.1.9, 4.1.10, 4.1.11); Tailings storage and mine waste storage management (4.2.7, 4.2.15, 4.2.16, 4.2.17); Water management (4.3.2, 4.3.3, 4.3.4, 4.3.6, 4.3.7, 4.3.8, 4.3.9); Biodiversity, ecosystem services and protected and conserved areas (4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.4.6, 4.4.7, 4.4.8, 4.4.9); Air quality and dust management (4.5.1, 4.5.3, 4.5.7, 4.5.8, 4.5.9); Climate action (4.6.2, 4.6.8, 4.6.11). Note that engagement and information-sharing with Indigenous Peoples are addressed specifically in Chapter 2.2 (see Section 2.2.4).

[14] These dimensions must be regularly reviewed and updated as per 1.2.6.2.

[15] As these will depend largely on a specific context, stakeholders will help define what is considered culturally appropriate and easily accessible. These dimensions must be collaboratively defined as per 1.2.3.1, and regularly reviewed and updated as per 1.2.7.1.

[16] "in a timely manner" will likely vary based on the ENTITY's resources and procedures (e.g., some companies may have due diligence procedures in place for releasing data publicly) and also the size/nature of the request. Generally, however, requests should be fulfilled within 1 to 3 months, although for particularly large requests or requests made to companies with limited capacity to fulfill information requests, some flexibility may be needed. Also, some companies have stringent quality assurance procedures that must be followed in order to share data publicly, and so may require more time to prepare materials for release. (See also 1.2.3.2 for requests that are not responded to in what seems like a "timely manner"). This dimension must be collaboratively defined as per 1.2.3.1, and regularly reviewed and updated as per 1.2.7.1.

[17] See requirement 1.2.3.1 for identification and mutual agreement on what timeliness and effectiveness mean for relevant stakeholders and rights-holders. Such timeliness and effectiveness will be regularly evaluated, reviewed, and improved, as per Sections 1.2.6 and 1.2.7.

[18] The Entity should first work with the party requesting information to identify/advise on how to refine the request to facilitate sharing of the relevant information in full.

[19] As these will depend largely on a specific context, stakeholders will help define what is considered culturally appropriate and easily accessible. These dimensions must be collaboratively defined as per 1.2.3.1, and regularly reviewed and updated as per 1.2.7.1.

[20] The Entity can agree upon appropriate timelines for modification to engagement agendas with stakeholders as part of its broader consultations with these stakeholders about how engagement should be carried out (see 1.2.3.1).

[21] Engaging in a manner 'free from manipulation, interference, coercion, or intimidation' means not only that the Entity does not put this pressure on stakeholders, but also that stakeholders are given mechanisms through which to participate freely and comfortably (including separate groups for women, youth, or other groups that may not feel free to speak out in a group setting, options to submit anonymous grievances, options to have a woman present to receive grievances / conduct engagement if required, etc.). See also related requirements within this chapter, including requirements in Sections 1.2.2, 1.2.3, 1.2.4, and 1.2.5.

[22] What may constitute 'underserved and/or marginalized people' requiring additional focus depends on the context and the matter at hand. Entities should draw on stakeholder mapping, stakeholder interviews, project documentation, as well as site observations to determine whether all relevant stakeholders have been identified and included. For this requirement, particular attention should be paid to those who are not able or willing to participate without particular considerations/accommodations; this often includes persons with disabilities, socially or geographically marginalized groups, those in a state of poverty, the illiterate, groups for whom local cultural practices deter participation, etc. Additional guidance will be provided in the IRMA Guidance Document.

[23] Where mines were unable to begin engagement planning and implementation prior to mine planning, they need to provide a rationale as to why it was not possible to do so (more details may be provided in Guidance).

[24] Common stakeholder engagement mechanisms include, but are not limited to, dialogue platforms, roundtables, citizen participation committees, advisory councils, participatory workshops, thematic working groups. There could be several engagement mechanisms, if required, based on interests and needs as identified in conjunction with the communities, rights-holders, and other stakeholders as required in several requirements of this chapter.

[25] This also includes grievances and how they are handled and resolved.

[26] Across different genders, ages, ethnicities, cultures, and linguistic groups, and including potentially underserved and/or marginalized people.

[27] The Entity must work with traditional structures to identify potential gaps in representation vis-a-vis IRMA requirements/criteria – if traditional leaders agree to adjust or allow for other engagement forms to meet these requirements/criteria, there would be no need to implement additional, separate, processes. In any case, the Entity needs to demonstrate that they made a good faith effort.

[28] E.g. group or organization.

[29] E.g., to engage in dialogue, consultations, studies, impact assessments, the development of mitigation plans, monitoring programs, community development strategies, etc.

[30] What may constitute 'underserved and/or marginalized people' requiring additional focus depends on the context and the matter at hand. Entities should draw on stakeholder mapping, stakeholder interviews, project documentation, as well as site observations to determine whether all relevant stakeholders have been identified and included. For this requirement, particular attention should be paid to those who are not able or willing to participate without particular considerations/accommodations; this often includes persons with disabilities, socially or geographically marginalized groups, those in a state of poverty, the illiterate, groups for whom local cultural practices deter participation, etc. Specific measures to increase accessibility and ensure participation of all stakeholders and rights-holders can include translation, transportation, material in formats adapted to persons with disabilities or sensory issues, etc (see 1.2.2.1 and Section 1.2.4).

[31] Capacity gaps or needs may be legal, technical, process-oriented (e.g., negotiation skills), logistical, or other. Different assessment and consultation processes may need to take place over time, as the stakeholders involved in the development of mitigation strategies may not be the same ones engaged in monitoring, for example.

[32] Depending on the circumstances, appropriate assistance may include, but is not limited to providing: access to training, financial and/or technical support to select and hire independent experts, capacity-building.

[33] This can include, but is not limited to: accepting the offer to receive access to training, financial and/or technical support to select and hire independent experts, capacity-building, or other facilitation strategies.

[34] This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

[35] This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

[36] This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

[37] This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

2025 – Initiative for Responsible Mining Assurance

www.responsiblemining.net

IRMA Initiative for Responsible Mining Assurance