



Initiative for Responsible  
Mining Assurance

# **EXCERPT FROM THE** **IRMA Standard**

for

Responsible Exploration, Extraction,  
and Processing of Minerals

→ **2<sup>nd</sup> DRAFT** ←

for public consultation

**CHAPTER 1.6 – Grievance Mechanism, Whistleblowers, and  
Access to Remedy**

**IRMA Standard v2.0 DRAFT 2**

**July 2025**

English Version

# Disclaimer and Context on this Draft

The 2<sup>nd</sup> DRAFT Version of the IRMA Standard for Responsible Exploration, Extraction, and Processing of Minerals V2.0 (hereafter referred to as the “2<sup>nd</sup> 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 2<sup>nd</sup> 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 1<sup>st</sup> 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 2<sup>nd</sup> 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 2<sup>nd</sup> 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 1<sup>st</sup> 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 2<sup>nd</sup> 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 1<sup>st</sup> 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.**

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# Objectives of this 2<sup>nd</sup> 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 2<sup>nd</sup> 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



The release of this 2<sup>nd</sup> 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 2<sup>nd</sup> 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 1.6

# Grievance Mechanism, Whistleblowers, and Access to Remedy

### SECOND DRAFT (JULY 2025): SUMMARY OF CHANGES

- Several requirements from the 2018 Standard have been combined to become the critical requirement in the chapter - this was done in response to feedback received on Consultation Question 1.4-01, and feedback stating that the previous approach - i.e. having as critical only the one requirement that simply required that a grievance mechanism exist - was insufficient.
- Offered clarity concerning the question of how "serious" human rights impacts should be addressed by removing the reference to serious and requiring instead that entities explain the process for handling grievances that involve allegations of impacts on human rights, including the potential for adjudication by an independent, third-party mediator or mechanism when dialogue does not lead to agreed remedies (1.6.1.1).
- Added additional sub-requirements to Section 1.6.1 to more clearly state a zero-tolerance approach to retaliation for utilizing grievance mechanism, and how the specific barriers to participation and needs of underserved and/or marginalized people should be addressed.
- Moved proposed whistleblower requirements from Chapter 3.1 (where they were in the October 2023 draft) to Chapter 1.6. See section 1.6.2.
- Added a Continuous Improvement section to be consistent with other Chapters in the Standard
- Other minor changes to language for consistency / clarity.

## RESPONSE TO CONSULTATION QUESTIONS OUTLINED IN FIRST DRAFT

Question #	Question	Feedback and Decision
1.4-01	<p><b>(1.4.1.1)</b></p> <p>Background: Requirement 1.4.1.1 was a critical requirement in the 2018 Mining Standard and is currently a critical requirement (for more on critical requirements see the note that accompanies 'Critical Requirements In This Chapter,' above).</p> <p>One of the issues that has arisen is that there may be a mechanism in place that allows grievances to be filed and addressed, but the mechanism may not be considered as entirely effective by some stakeholders.</p> <p><b>Question:</b> Should the critical element simply be that there is a mechanism that allows stakeholders to raise and seek remedy for their grievances, or should we add additional expectations to this critical requirement that speak to the quality and/or effectiveness of the mechanism? For example, we could add the content of (non-critical) requirement 1.4.2.1 to this (critical) requirement.</p>	<p><b>Feedback received:</b> Feedback on this consultation question overwhelmingly supported moving 'quality' related sub-requirements from former 1.4.2.1 and 1.4.3.1 to the critical requirement (now 1.6.1.1).</p> <p><b>Decision:</b> We propose that the critical requirement be a combination of two previous requirements related to "existence" and "quality/maturity" of the grievance mechanism (See requirement 1.6.1.1).</p>
1.4-02	<p><b>(1.4.1.1)</b></p> <p>Background: Chapter 1.4 - 'Complaints and Grievance Mechanism and Access to Remedy' includes a range of requirements surrounding the existence of an accessible and effective operational-level grievance mechanism. It is not possible to score well on Chapter 1.4 if the mechanism does not have certain quality-related characteristics. Other chapters (i.e., human rights, gender, resettlement, security, ASM) also have requirements relating to the existence of a grievance mechanism; however, the requirements in each of those chapters ask only that a mechanism is in place that allows grievances to be filed and addressed, but they do not speak to the overall quality of that mechanism. This is an approach proposed by IRMA to avoid too much repetition across chapters. However, this creates a situation in which an ENTITY could theoretically score 'fully meets' on the grievance-related requirement in an individual chapter (which in most cases only asks that stakeholders have "access to" a grievance mechanism), even if the grievance mechanism as a whole is not an effective one (as reflected in the overall score for Chapter 1.4).</p> <p><b>Question:</b> Should an ENTITY's score on grievance-related <b>requirements</b> within individual non-grievance-specific chapters be restrained or linked to the overall score that the ENTITY gets on the grievance chapter (Chapter 1.4) as a whole?</p>	<p><b>Feedback received:</b> Feedback largely supported putting a 'cap' on the ENTITY's score on grievance-related mechanisms in other chapters based on its performance on Chapter 1.6 (former 1.4).</p> <p><b>Decision:</b> Based on input, we are proposing to adjust the IRMA Assessment Scoring system such that an ENTITY's potential score on the grievance-related requirement in an individual chapter (which simply requires the existence of a grievance mechanism capable of receiving grievances relating to the particular issue, or in Chapter 2.2 that mechanism/s are specifically designed with, and for, Indigenous Peoples) is limited by their score on Chapter 1.6 (former 1.4) on Grievances (which addresses not just the existence but also the quality of a grievance mechanism). This means that, although an ENTITY may have otherwise received 'fully meets' on a grievance mechanism requirement in an issue-specific chapter, if the ENTITY does not receive a full score on Chapter 1.6 as a whole, then their score on the issue-specific grievance requirement cannot be higher than 'partially meets'. If the ENTITY has developed separate issue-specific grievance mechanism/s, it will be assessed separately against all relevant requirements of Chapter 1.6.</p>



	<p>For example, if a site scores 80% on Chapter 1.4, the most the site could receive for a <u>grievance</u> requirement in the other chapters would be a 'substantially meets,' but if a site scores 100% on Chapter 1.4 then, assuming the mechanism can handle <u>grievances</u> specific to the other chapters, they could possibly get a 'fully meets' rating on those <u>grievance</u> requirements.</p>	
1.4-03	<p><b>(1.4.2.1)</b> <b>Question:</b> Stakeholder feedback suggested that an independent third-party should be involved in the assessment of more <u>grievances</u> to ensure that resolutions are unbiased, impartial, and fair to all parties involved. Is this considered best practice and, if so, is it applicable to only the most serious <u>grievances</u> or to all <u>grievances</u>?</p>	<p><b>Feedback received:</b> Feedback was very split on this question - some said that third-party review was not necessary because there are enough checks and balances already built into IRMA on this topic, including stakeholder review of <u>grievance</u> processes; others said that regular review as part of the regular <u>grievance</u> resolution process would delay timely response to <u>grievances</u>; others said that review of the process could be done externally every 2-3 years; others still said that only human rights <u>grievances</u> or <u>grievances</u> where there is a potential conflict of interest with ENTITY personnel responsible for reviewing the <u>grievance</u> should be reviewed.</p> <p><b>Decision:</b> We are proposing a new sub-requirement for 1.6.1.1 (former 1.4.2.1) that requires the ENTITY to explain the process for handling <u>grievances</u> that involve allegations of impacts on human rights, including the potential for adjudication by an independent, third-party mediator or mechanism. This is in accordance with IRMA Chapter 1.3 (requirements 1.3.4.3 and 1.3.4.5). See 1.6.1.1.d.</p>



## BACKGROUND

Mining, mineral processing, and other large development projects inevitably raise concerns and complaints from community members and stakeholders affected by these projects. It is now expected practice for mining and mineral processing entities to have in place site-level procedures for systematically receiving, tracking, resolving, and communicating with stakeholders, including workers and local communities, about their complaints or grievances. Combined, these various procedures are referred to as an “operational-level grievance mechanism”.

The words 'grievance' and 'complaint' are sometimes used interchangeably, but this is not always the case. Often a complaint is seen as an isolated or event-based concern, while a grievance is a more complex or accumulated sense of wrong. Similarly, complaints are often seen as concerns that can be addressed through informal means, while grievances require a more formal process. However, perceptions of this relationship can also be the reverse.<sup>1</sup> For the purposes of the IRMA Standard, a “grievance mechanism” is expected to be able to handle both complaints and grievances; however, for simplicity the term 'grievance' is used in the requirements of this Chapter, and throughout the Standard.<sup>2</sup>

Having accessible and trusted procedures in place to receive stakeholder complaints can lead to the quick resolution of many issues before they escalate into serious grievances or conflicts. Stakeholders are more likely to trust grievance procedures if they have some say in their design so that they are adapted to local expectations and needs.

Operational-level grievance mechanisms are an integral and essential component required from all business enterprises in order to comply with the UN Guiding Principles on Business and Human Rights, which also define a set of internationally-approved effectiveness criteria. Operational-level grievance mechanisms should be: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue. This Chapter ensures that all these dimensions are reflected and articulated through one or more requirements.

Importantly, grievance mechanisms should not be considered a substitute for community and stakeholder engagement processes that allow for airing of concerns. The two are complementary and should be mutually reinforcing.<sup>3</sup>

Additionally, operational-level grievance mechanisms are just one option for individuals to seek justice or remediation for damages that they believe have occurred as a result of ENTITY activities. For example, traditional authorities may have conflict or dispute resolution systems in place; countries may have legal frameworks, such as court systems, to provide recourse to aggrieved parties; workers may have access to project- or corporate-level whistle-blower procedures; and remedies may be sought through national or international human rights bodies, labor tribunals or other non-judicial mechanisms. Operational-level grievance mechanisms should neither be used to undermine the role of legitimate trade unions in addressing labor-related disputes, nor preclude any stakeholder from accessing judicial or other non-judicial grievance mechanisms.<sup>4</sup>

To ensure the promotion and protection of the fundamental right of opinion and expression, while ensuring ethical conduct, more companies have been establishing effective whistleblowing mechanisms (or similar procedures) that enable individuals from within or external to the company to raise concerns about unethical or unlawful conduct. Like grievance mechanisms, best practices and criteria for such whistleblowing mechanisms have been discussed and recommended at the international level, as well as at the national level (at least 170 States and territories have adopted some form of whistleblower protection as a part of their national laws, including 60 that have established comprehensive legal frameworks to protect whistleblowers in all employment sectors). Those should allow anonymous, confidential reporting, and prevent any form of retaliation against persons or groups who use them.

## 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
- OECD Due Diligence Guidance for Responsible Business Conduct, 2018
- IFC Guide to Designing and Implementing Grievance Mechanisms for Development Projects, 2008
- IFC Good Practice Note Addressing Grievances from Project-Affected Communities, 2009
- ILO Recommendation R130 on Examination of Grievances Recommendation, 1967
- ITUC Legal guide for setting up an operational-level grievance mechanism for the world of work in the context of business and human rights, 2022
- EBRD Performance Requirement 2: Labour and working conditions – Guidance note on employee grievance mechanisms, 2023

## OBJECTIVES OF THIS CHAPTER

To provide credible, effective, and accessible means for affected communities, individuals, and other stakeholders to raise and resolve grievances or concerns arising, while not limiting their ability to seek remedy through other mechanisms.

## 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

## ISSUE-SPECIFIC GRIEVANCE MECHANISMS ACROSS THE STANDARD

There are other Chapters in this Standard that require the ENTITY to ensure that stakeholders have access to, and are preemptively informed about, a rights-compatible grievance mechanism and/or other mechanisms through which they can raise, and seek resolution or remedy for, complaints and grievances related to specific topics. This applies to Human Rights (Chapter 1.3); Upstream and Downstream Business Partners (Chapter 1.4); Conflicts (in the context of conflict-affected and high-risk areas, Chapter 1.5); Gender (Chapter 2.3); Displacement and Resettlement (Chapter 2.5); Grievance Mechanism for Workers (Chapter 3.1); and Security Management (Chapter 3.4).

The operational-level grievance mechanism developed as per this Chapter 1.6 may be used as the mechanism to receive and address those issue-specific grievances, or a separate mechanism (or mechanisms) may be created to handle those issue-specific grievances only.

Separately, and if Indigenous Peoples whose rights or interests may be directly or indirectly affected by the ENTITY's mining-related activities have been identified as per 1.2.1.1. and 1.3.2.3, Chapter 2.2 requires the ENTITY to collaborate with affected Indigenous Peoples "to develop and implement a rights-compatible grievance mechanism (or mechanisms), in line with all Sections of Chapter 1.6, through which affected Indigenous Peoples can raise, and seek resolution or remedy for, complaints and grievances related to the impacts of the project/operation and/or the ENTITY's actions on their rights and interests". Unlike all the issue-specific mechanism listed above, the grievance mechanism required in Chapter 2.2 cannot be simply addressed through the 'general' grievance mechanism required in Chapter 1.6. Indeed, as required in 2.2.4.8.b, "if the operational-level grievance mechanism required in Chapter 1.6 is to be used for this purpose, the ENTITY does so **only with the express and explicit approval of affected Indigenous Peoples**, and that mechanism's procedures are reviewed, revised if necessary, and agreed to by affected Indigenous Peoples".

## 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 are no (0) optional IRMA+ requirements 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.

# IRMA Requirements

## 1.6.1 Operational-Level Grievance Mechanism

### 1.6.1.1 Critical Requirement

The ENTITY has an operational-level grievance mechanism (or equivalent) in place that:

- Allows all affected rights-holders and stakeholders, and others (referred to collectively as “stakeholders”)<sup>5</sup> to raise, and seek resolution or remedy for, complaints and grievances (hereafter referred to collectively as “grievances”) related to the site, its associated facilities, and the ENTITY’s actions;
- Clearly defines how grievances and communications with those filing grievances are recorded, acknowledged, investigated, monitored, and equitably resolved or remedied, including with indicative timeframes for each stage of the procedure;
- Clearly defines how complainants can file grievances anonymously, and/or confidentially;
- Clearly defines the procedure for handling grievances that involve allegations of impacts on human rights, including the potential for adjudication by an independent, third-party mediator or mechanism, when dialogue does not lead to agreed remedies<sup>6</sup>;
- Explicitly states that participation in an operational level grievance mechanism does not preclude a complainant from seeking redress through administrative, judicial, or other non-judicial remedies, and that no remedy provided by an operational-level grievance mechanism requires or implies that complainants waive their right to seek recourse for the same grievance through other available mechanisms; and
- Clearly lists options for recourse if a complainant does not find the resolution of their grievance satisfactory and/or if the mechanism is deemed inadequate or inappropriate for handling grievances, especially relating to human rights abuses.

### 1.6.1.2 This grievance mechanism ensures that:

- Complainants are not the subject of retaliation or retribution, including by maintaining their confidentiality or anonymity (as per 1.6.1.1.c), and that complainants who are workers or workers’ representatives can use the grievance mechanism<sup>7</sup> without prejudice to applicable employment rights and social benefits as well as to any applicable collective agreements;
- Differentiated gender-sensitive procedures are in place to provide timely, appropriate, and effective remedies specifically for women, girls, and LGBTIQ+ complainants, particularly where they are survivors of discrimination and/or sexual- and gender-based violence;
- The ENTITY identifies potential barriers to using the operational-level grievance mechanism by people of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people<sup>8</sup>, and identifies support and facilitation measures; and
- The ENTITY clearly defines procedures for stakeholders of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people to request and benefit from such support and facilitation measures.

## 1.6.2 Whistleblowing Mechanism

**1.6.2.1** The ENTITY has a formal and documented whistleblower mechanism in place that:

- a. Is overseen by a dedicated person or department;
- b. That enables and invites individuals and entities to submit notifications where they have information or concerns regarding: 1) Actual or potential adverse impacts with respect to the ENTITY's own operations; 2) Actual or potential adverse impacts with respect to the operations of the ENTITY's business direct and indirect business partners in its chain of activities; and 3) Unlawful or unethical activity or behavior<sup>9</sup> related to the site or its associated facilities<sup>10</sup>;
- c. Ensures that notifications can be made either anonymously or confidentially;
- d. Ensures that the ENTITY prevents any form of retaliation<sup>11</sup> against a whistleblower, including by ensuring that the identity of individuals or entities that submit notifications remains confidential (see c.), and when whistleblowers are workers or workers' representatives they can use the whistleblowing mechanism without prejudice to applicable employment rights and social benefits as well as to any applicable collective agreements; and
- e. Ensures that individuals or entities that submit notifications<sup>12</sup> are informed about how their notifications will be recorded, acknowledged, investigated, monitored, and acted upon where relevant, including with indicative timeframes for each stage of the procedure.

## 1.6.3 Implementation and Management

**1.6.3.1** The ENTITY has a system in place to ensure that affected rights-holders and stakeholders are proactively and preemptively informed, in accordance with Section 1.2.3, about:

- a. The existence of the operational-level grievance mechanism, of the whistleblowing mechanism, and their associated procedures;
- b. How to file a grievance and to submit whistleblowing notifications;
- c. The fact that using the operational-level grievance mechanism does not preclude them from seeking redress related to grievances through administrative, judicial, or non-judicial remedies;
- d. The ability of any complainant to request appropriate follow-up on the complaint from the ENTITY;
- e. The ability of any complainant to meet with the ENTITY's representatives at an appropriate management level to discuss actual or potential severe adverse impacts that are the subject matter of the complaint, and potential remediation; and
- f. The ability of any complainant to be provided by the ENTITY with the reasons a complaint has been considered founded or unfounded and, where considered founded, with information on the measures taken or to be taken.



E2 E3 D M P

**1.6.3.2** The ENTITY has a system in place to ensure that:

- a. Relevant personnel (including ENTITY's ~~employees and contractors~~) who interact with ~~affected rights-holders and stakeholders~~ are informed of, and understand, the proper procedures for handling stakeholder ~~grievances~~;
- b. Relevant personnel (including ENTITY's ~~employees and contractors~~) directly involved in the implementation and management of the operational-level ~~grievance~~ mechanism are trained on, and understand, the respectful and equitable handling of all ~~grievances~~, whether real or perceived; and
- c. All ~~grievances~~<sup>13</sup> are recorded, acknowledged, investigated, monitored, and equitably resolved or remedied, as per the procedures and indicative timeframes required in 1.6.1.1;
- d. All whistleblowing notifications are recorded, acknowledged, investigated, monitored, and acted upon where relevant, as per the procedures and indicative timeframes required in 1.6.2.1.

## 1.6.4 Monitoring and Evaluation

E2 E3 D M P

**1.6.4.1** To monitor and evaluate the effectiveness and appropriateness of the measures taken to manage ~~grievances~~ and whistleblowing notifications,<sup>14</sup> and to provide remedy, the ENTITY:

- a. Regularly tracks and documents, over successive time periods, the number and nature of ~~grievances~~ filed<sup>15</sup>, the measures taken in response, and how those are providing effective, equitable, and satisfactory resolution and/or remedy to complainants, against the indicative timeframes required in 1.6.1.1;
- b. Regularly tracks and documents, over successive time periods, the number and nature of whistleblowing notifications submitted, the measures developed in response, and how those are effectively addressing the adverse impacts and unlawful or unethical activity or behavior raised, against the indicative timeframes required in 1.6.2.1; and
- c. Disaggregates the data required in a. and b. according to gender-disaggregated indicators and other categories of disaggregated indicators where appropriate.

E2 E3 D M P

**1.6.4.2** The monitoring and evaluation process:

- a. Encourages and facilitates joint tracking or joint fact-finding with complainants, including about their level of satisfaction with the remedy process and its outcomes, and suggestions for improvements to the operational ~~grievance~~ mechanism<sup>16</sup>, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2<sup>17</sup>;
- b. Includes ~~continuous feedback~~ from internal and external sources, including from joint tracking and joint fact-finding with complainants; and
- c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of complainants and whistleblowers.<sup>18</sup>

## 1.6.5 Continuous Improvement

### 1.6.5.1 At least twice a year the ENTITY:

- Review monitoring and evaluation results, informed by internal and external feedback, as per Section 1.6.4;
- Review the functioning and uptake, including by people of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, of the operational-level grievance mechanism/s and the whistleblowing mechanism/s<sup>19</sup>;
- Reviews its effectiveness in providing effective, equitable, and satisfactory resolution and/or remedy to complainants, informed by the monitoring and evaluation required in 1.6.4.1 and 1.6.4.;
- Develops and implements time-bound corrective measures to update, if necessary<sup>20</sup>, its operational-level grievance mechanism/s<sup>21</sup> in accordance with Section 1.6.1, and/or its whistleblowing mechanism/s in accordance with Section 1.6.2, and their implementation and management in accordance with Section 1.6.3;
- Develops and implements time-bound corrective measures to update, if necessary<sup>22</sup>, the measures developed and taken to provide effective, equitable, and satisfactory resolution and/or remedy to complainants, and to avoid repetition of the same complaints/grievances; and
- Develops and implements time-bound corrective measures to update, if necessary<sup>23</sup>, its monitoring and evaluation processes in accordance with Section 1.6.4.

## 1.6.6 Information-Sharing and Public Reporting

### 1.6.6.1 Unless grievances are filed anonymously, complainants filing grievances are systematically informed by the ENTITY, either in writing or verbally with documentation of the exchange, and in accordance with Section 1.2.3, of:

- The reasons a complaint has been considered founded or unfounded and, where considered founded, with information on the measures taken or to be taken;
- How their grievances were investigated, monitored, and resolved or remedied, as per the procedures and indicative timeframes required in 1.6.1.1; and
- How their levels of satisfaction with the remedy process and its outcomes were assessed and documented, including through joint tracking or joint fact-finding with complainants as per 1.6.4.2.

### 1.6.6.2 At least annually, and with due regard for complainants' and whistleblowers' safety, data privacy, and for security concerns, the ENTITY makes and maintains<sup>24</sup> publicly accessible all updated and previous versions of:

- The total number and nature of grievances filed and whistleblowing notifications submitted during the reporting period<sup>25</sup>;
- The percentage of grievances that were addressed and resolved during the reporting period;
- The percentage of grievances remedied during the reporting period;
- These datapoints (a. to c.) are disaggregated by gender-disaggregated indicators and other categories of disaggregated indicators where appropriate;
- Key findings of the monitoring and evaluation process required in 1.6.4, including feedback from stakeholders for improving the mechanisms, and of the review process required in 1.6.5.1; and
- A list of the time-bound corrective measures identified as per 1.6.5.1.

## CROSS REFERENCES TO OTHER CHAPTERS

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

## CHAPTER ENDNOTES

This chapter does not pertain to grievances related to IRMA. However, IRMA has developed its own grievance mechanism specific to the IRMA system, and IRMA's procedures outline measures to take to raise concerns about IRMA audits, the IRMA assessment process, and the IRMA system more generally. The mechanism is available online (click [here to access](#)).

<sup>1</sup> John F. Kennedy School of Government, Harvard Univ. 2008. Rights-Compatible Grievance Mechanisms: A Guidance Tool for Companies and Their Stakeholders. p. 12. Available at: <https://unglobalcompact.org/library/57>

<sup>2</sup> It is also possible that other forms of stakeholder feedback such as solicitations and suggestions may also be managed through a centralized system to track stakeholder engagement that may be linked to or even constituent of the 'grievance mechanism'. These forms of stakeholder engagement are assessed under Chapter 1.2 (Community and Stakeholder Engagement). To the extent that there is overlap between the mechanisms utilized to receive grievances and those utilized to receive stakeholder feedback more broadly, auditors will consider the evidence as it applies to relevant requirements in both chapters.

<sup>3</sup> IFC. 2009. Good Practice Note: Addressing Grievances from Project-Affected Communities. p. 6. <https://www.ifc.org/en/types/insights-reports/2000/publications-gpn-grievances>

<sup>4</sup> Ruggie, J. 2011. Guiding Principles on Business and Human Rights. A/HRC/17/31. Commentary for Principle 29. Available at: [www.ohchr.org/Documents/Issues/Business/A-HRC-17-31\\_AEV.pdf](http://www.ohchr.org/Documents/Issues/Business/A-HRC-17-31_AEV.pdf)

<sup>5</sup> For workers, see specific requirement in Chapter 3.1; for Indigenous Peoples, see specific requirement in Chapter 2.2.

<sup>6</sup> This is in accordance with IRMA Chapter 1.3, which requires that any identified human rights impacts be managed by developing "timely ... mitigation strategies and remediation in collaboration with affected rights-holders. If mutually acceptable remedies cannot be found through dialogue, the ENTITY attempts to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights-holders." (See Chapter 1.3, requirement 1.3.4.3).

<sup>7</sup> Note that a specific worker grievance mechanism is required in Chapter 3.1 (which could be separate or combined with the general mechanism required in this Chapter).

<sup>8</sup> 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 or household duties deter participation (i.e., women, elderly, children), etc. Additional guidance is provided in the IRMA Guidance Document.

<sup>9</sup> E.g., bribery, corruption, willfully ignoring safety standards, etc...

<sup>10</sup> This includes activity or behavior of employees, contractors, suppliers, but also any ENTITY's corporate owner/s' administration or management bodies (such as Board of Directors, Board of Trustees, direct owners, shareholders, State-level governing individuals or departments)

<sup>11</sup> In particular, whistle-blowers must be protected against coercion or harassment of themselves or their families, discrimination, physical harm to a person or property, threats of retaliation, job loss, suspension or demotion, transfer or other hardship, disciplinary penalty, blacklisting or prosecution on grounds of breach of secrecy laws, libel or defamation. As identified in the 2015 UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression annual report to the General Assembly (A/70/361) <https://documents.un.org/doc/undoc/gen/n15/273/11/pdf/n1527311.pdf>

<sup>12</sup> For persons and entities who submit notification anonymously, internal or third-party mechanism are encouraged to allow for follow-up and tracking too (e.g. using unique identification numbers or credentials that can be reused by anonymous whistleblower, ensuring that their IP address or location when doing so is not determined or stored).

<sup>13</sup> Including those received verbally, anonymously, and/or any other manners. This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).

<sup>14</sup> This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).

<sup>15</sup> Including those received verbally, anonymously, and/or any other manners. This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).

<sup>16</sup> E.g., How to make grievance mechanism(s) more effective, trusted, and accessible to all stakeholders.

<sup>17</sup> This is especially relevant for contexts where your business and (potentially) affected rights-holders are in dispute about a particular (potential) adverse impact, and rights-holders are unlikely to accept the business' own tracking of the effectiveness of its response to it.

<sup>18</sup> Especially of rights-holders at heightened risk of vulnerability and marginalization, including children, or any other sensitive data.

<sup>19</sup> This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).





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<sup>20</sup> 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.

<sup>21</sup> This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).

<sup>22</sup> 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.

<sup>23</sup> 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.

<sup>24</sup> All material must remain publicly accessible at least until the completion of all post-closure activities (including any previous versions, iterations and revisions). Note that the intention is not that the reports should be removed from the public domain after that. Rather, where possible, it should be retained indefinitely as the information may be important for legal or other purposes.

<sup>25</sup> This should include also all topic-specific grievances (filed either through dedicated grievance mechanism/s or the general one).

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