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

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 2.4
Obtaining Community Support and Delivering Benefits

SECOND DRAFT (JULY 2025): SUMMARY OF CHANGES

- Feedback from stakeholders during the public review period indicated significant concerns with the two proposed IRMA requirements addressing "Broad Community Support" (BCS) (2.3.2.1 which asks that entities be able to demonstrate having obtained BCS through local democratic or other governance mechanism, and 2.3.2.2 which asks that entities demonstrate that they are maintaining BCS over time). Some of these concerns were that:
    1. Formal indications of support such as that envisioned by 2.3.2.1 are extremely rare in practice.
    2. If / where such processes do occur it is unlikely that auditors would have access to the full range of information required to assess if they meet 2.3.2.1 and / or these processes likely will not change to meet IRMA requirements.
    3. There is potential for wide inconsistency in terms of how auditors determine whether BCS was / has been obtained in a particular context.
    4. Where BCS already exists *de facto*, asking entities to go out and formalize it may provide perverse incentives to communities to suddenly 'withhold (formal / *de jure*) support' to obtain more benefits than those they had previously deemed sufficient.
    5. Where BCS already exists *de facto* and communities are willing to formalize this, then "obtaining BCS" becomes just an expensive and time-consuming 'check-box' process that doesn't substantively change the situation on the ground.
    6. If an ENTITY seeks to obtain *de jure* BCS and is unsuccessful (either because BCS does not *de facto* exist, or because of the situation indicated in #4 above, or because logistically is it simply not feasible), unless IRMA is also going to require that operations stop unless / until BCS is obtained, it is somewhat of an empty process.
    7. Given that the requirements for BCS are not critical, there are no consequences (besides receiving a low score on these two IRMA requirements), meaning entities may simply opt to take no action on this.
- Proposed to move away from the concept of obtaining and maintaining "BCS" to instead create an entirely new set of requirements that are not only auditable, but also hopefully lead to positive changes on the ground. Our proposed approach is based on the premise that all sites should demonstrate that they understand the level and causes of support (and opposition) in affected communities and that they use this information to make efforts to continuously improve relationships so that support is strengthened over time. These are reflected in the new proposed Section 2.4.2 below.
- Strengthened and clarified requirements related to procurement in Section 2.4.3, including a local content management plan (with targets/goals related to local employment and procurement), and also added a new requirement related to transparency around local hiring (2.4.6.3).
- Proposed one optional requirement (IRMA+) for additional data disaggregation re. to local content (2.4.6.4).
- Removed requirement for minimum standards for suppliers of goods and services, as this is now covered in Chapter 1.4–Upstream and Downstream Sustainability Due Diligence, requirement 1.4.2.1, however, included in this Chapter monitoring requirements related to the supplier Code of Conduct mentioned in 1.4.2 (2.4.4.2.c) and reporting on compliance in 2.4.6.2.c.
- Substantial structural changes to increase clarity and consistency with the rest of the Standard.

RESPONSE TO CONSULTATION QUESTIONS OUTLINED IN FIRST DRAFT

Question #	Question	Feedback Received and Proposed Decision
2.3-01	**Background:** 'Broad community support' neither requires nor implies 100% agreement in the community. Therefore, even if a democratic vote is taken or an agreement signed there will almost always be some community members who are supportive of a project or operation, and some who are opposed (see a similar discussion related to free, prior and informed consent (FPIC) in CONSULTATION QUESTION 2.2-01 in Chapter 2.2). Furthermore, even if agreements have been signed or there was at some point in time a community vote, etc., sentiments can change over time: opposition may emerge or increase if entities are not responsive to community concerns and/or do not manage social or environmental impacts well; or support may increase if efforts are made to create positive opportunities or benefits such as jobs or training programs. As a result, at one point in time there may be significant enough community-based opposition to say that a site has not obtained or maintained broad community support, and a few years later this situation could reverse. Ultimately, at every audit the auditors will need to determine about whether a project /operation has broad community support based on the weight of evidence that they have reviewed. Typically, auditors: • Carry out interviews with affected community members, local and regional non-governmental organizations, and local authorities to understand any processes, events, or outcomes that might indicate presence/absence or change in level of broad community support; and • Review current social and traditional media to ascertain community opinions and responses to the ENTITY/project. IRMA will continue to train auditors so that the narratives that accompany this requirement in the public audit report reflect the weight of evidence (i.e., any positive support and any opposition that may exist) that led to their conclusions. We will also develop additional guidance and training for auditors on how to assess/factor in the presence of some opposition (i.e., how much weight to give to a	**Feedback received**: Public feedback expressed concern with the idea of being able to consistently and objectively determine indicators to "assess" whether BCS had been 'obtained' or 'maintained', although feedback indicated that indicators to gauge level of support were possible, as distinct from attempting to establish a definitive indication of when and how support is widespread and consistent enough to constitute "broad" community support as a static concept. Feedback also suggested, as a result of the difficulties outlined above, that auditors should use their best judgment when accessing and be trained to appropriately weigh evidence. **Proposed Decision:** Based on stakeholder feedback received, IRMA proposes to move away from the concept of obtaining and maintaining "Broad Community Support" (BCS) to instead create an entirely new set of requirements that can be consistently and objectively audited, and also hopefully lead to positive changes on the ground. Our proposed approach is based on the premise that all sites demonstrate that they understand the level and reasons for support (and opposition) in affected communities, and that they use this information to make efforts to continuously improve relationships so that support is strengthened over time. These are reflected in the new proposed Section 2.4.2. We will no longer use the term "broad community support" in Chapter 2.4. Our decision is based on the concerns expressed with being able to objectively define and measure what constitutes BCS. Though directly taken from the language of the IFC Performance Standard, we have had to acknowledge the methodological impossibility (or inadequate pretention) of claiming that a site 'obtained broad community support'. As expressed in an Advisory Note[i] published in 2010 by the Office of the Compliance Advisor/Ombudsman (CAO) for the International

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[i] Review of IFC' s Policy and Performance Standards on Social and Environmental Sustainability and Policy on Disclosure of Information. https://www.cao-ombudsman.org/sites/default/files/2021-06/CAOAdvisoryNoteforIFCPolicyReview_May2010.pdf

	handful of negative articles, a few oppositional tweets, a group of unhappy community members, etc.). **Question:** Are there specific metrics that can consistently and objectively reflect whether or not broad community support is being maintained? Or is it enough that auditors weigh the evidence and are transparent about their findings?	Finance Corporation (IFC) Multilateral Investment Guarantee Agency (MIGA) Members of the World Bank Group: "*IFC's implementation of its Broad Community Support commitment has been highly restrictive and not transparent. As a result, IFC has missed the opportunity to play a leadership role in helping to advance the implementation of local approval processes. IFC's application of the Broad Community Support commitment has changed over time, yet these changes have not been clearly communicated.*" Determination of Broad Community Support in the most up-to-date version of the IFC Environmental & Social Review Procedures Manual (2016) remains a very opaque and subjective procedure. And IRMA has not been able to come up with agreed, clear metrics, and a weighting system, that would enable auditors to consistently make a determination of the achievement or non-achievement of broad community support.

BACKGROUND

There is widespread acknowledgement from extractive industries that efforts spent on building respectful relationships, responding to community and Indigenous Peoples' concerns, and minimizing and mitigating project-related impacts, can be beneficial to both companies and affected communities.

Mining companies typically contribute national and local economic benefits through payments in taxes and royalties. Mining and mineral processing companies can also contribute –often even more– by procuring goods and services from businesses owned and run by entrepreneurs located in the vicinity of the project/operation, or from the wider local area, or nationally in the country of operation. Leading companies also recognize the need for not only preventing harm, but also delivering additional benefits to affected communities, and that benefits are best defined by the communities themselves. When communities' needs and aspirations are not at the forefront of company investments, experience shows that efforts often fail to deliver long-lasting benefits. Increasingly, efforts are being made to ensure that community investments made by mining and mineral processing companies provide both immediate and ongoing benefits that last beyond the life of the mining operation. Measures and programs to support skills development and to maximize employment opportunities for local community members, including as consultants or contractors, have the potential to significantly contribute to the achievement of the United Nations Sustainable Development Goals (SDGs) that aims at preventing poverty and hunger, and at ensuring quality education, reduced inequalities, and good health and wellbeing, while also contributing to development and retention of talents for mining and mineral processing companies.

Benefit-sharing approaches can take many forms, according to the local context, and the needs and aspirations of affected communities. It is worth noting that benefit-sharing modalities may include co-ownership or co-management modalities with affected communities (which may also include Indigenous Peoples), as evidenced by recent examples in the sector. To maximize the meaningfulness and appropriateness of those models, as well as other benefit-sharing models, companies must understand barriers and enablers, to support communities' developmental aspirations and more broadly, to support a fairer distribution of benefits from mining and mineral processing operations with local communities. Those options may not be desired and pursued by all communities.

In addition to providing tangible benefits to affected communities, there is a growing need for companies to obtain and maintain a high level of community support for their projects and operations.[1] Steps taken by a company to obtain and expand community support can foster the development and maintenance of strong relationships with affected communities. And a high level of community support can provide reassurance to an ENTITY's shareholders and investors regarding the longer-term stability of its project/operation.

KEY REFERENCES

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

- IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts, 2012
- IFC Guidance Note 1: Assessment and Management of Environmental and Social Risks and Impacts, 2012 (updated 2021)
- IFC Community Development Resource Guide for Companies – Investing in People: Sustaining Communities through Improved Business Practice, 2001

OBJECTIVES OF THIS CHAPTER

To understand, measure, and take measures to increase support from affected communities; and produce tangible and equitable benefits to communities that are in alignment with their needs and aspirations and sustainable over the long term.

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 one (1) **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.

IRMA Requirements

2.4.1   Formalized Policy

2.4.1.1   The ENTITY has a formal policy in place that:

a.   Commits to improve, or at least maintain, the health, and social and economic wellbeing[2] of communities affected by the site and its associated facilities, and to operate with the highest possible level of community support for its projects/operations;

b.   Commits to maximize employment and procurement opportunities for local community members;

c.   Sets clear expectations for how personnel, contractors, and other relevant parties[3] linked to the site and its associated facilities shall adhere to this policy;

d.   Is approved at the top management level of the ENTITY;

e.   Is proactively communicated to personnel, contractors, and other relevant parties[4] linked to the site and its associated facilities;

f.   Is publicly accessible; and

g.   The ENTITY has allocated financial and staffing resources to implement this policy at the level of the site.

2.4.2   Understanding and Strengthening Community Support[5]

2.4.2.1   **Critical Requirement**
Building on the identification of affected rights-holders and stakeholders required in Chapters 1.2 and 1.3, a methodology to gauge the level and diversity of support for, and opposition to, the site and its associated facilities amongst affected communities, is developed by competent professionals, as follows:

a.   The methodology includes qualitative and quantitative performance indicators, linked to appropriate baseline data, to enable monitoring and evaluation of the level and diversity of support for, and opposition to, the site and its associated facilities amongst affected communities, as well as protocols and/or processes to collect the data necessary to measure performance against those indicators;

b.   It includes gender-disaggregated indicators, and other categories of disaggregated indicators where appropriate[6]; and

c.   It Is developed in collaboration with members and representatives of affected communities, in a manner that is inclusive of different genders, ages, and any potentially underserved and/or marginalized people.

E2 E3 D M P

2.4.2.2 The Entity has a system in place to ensure that:

a. The data necessary to measure performance against the indicators required in 2.4.2.1 is collected and updated at least every two years, or more frequently if requested by affected communities[7];

b. The data and results are proactively shared and discussed with affected communities, in accordance with Chapter 1.2;

c. It proactively seeks input from affected communities on measures that could strengthen the level and/or diversity of support for the project/operation amongst affected communities;

d. It proactively seeks input from affected communities on whether or not the methodology for gauging community support needs to be improved; and

e. When seeking input (c. and d.), it facilitates inclusion of affected rights-holders and stakeholders of different genders, ages, and any potentially underserved and/or marginalized people on these engagement activities;

E2 E3 D M P

2.4.2.3 Building on the data collected and the community input obtained as per 2.4.2.2, a community support plan (or equivalent) is developed by competent professionals, as follows:

a. The plan outlines specific measures to strengthen the level and diversity of community support for the project/operation;

b. If necessary[8], it outlines specific measures to improve the methodology for gauging community support;

c. It assigns implementation of measures to responsible staff with adequate skills and expertise;

d. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping[9];

e. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for affected rights-holders and stakeholders;

f. It maintains estimates of human resources and budget required; and

g. It includes a financing plan to ensure that funding is available for the effective implementation of the plan.

2.4.3   Management Plans to Deliver Community Benefits

2.4.3.1   Building on the identification of affected rights-holders and stakeholders required in Chapters 1.2 and 1.3, a **community benefit plan** (or equivalent[10]) is developed and documented by competent professionals, in collaboration with affected communities, as follows:

  a.   The plan includes community development and benefit measures/initiatives that benefit a broad spectrum of the community or that target specific groups[11] in ways that are accepted by the beneficiaries and the communities;

  b.   Those measures/initiatives include clear and agreed expected outcomes for the beneficiaries, aimed at improving, or at least maintaining, the social and economic wellbeing[12] of affected people;

  c.   The plan includes mechanisms that can be self-sustaining after closure of the operation, including through building community capacity to oversee and sustain any measures/initiatives agreed upon through negotiations;

  d.   The plan ensures that measures/initiatives are developed and documented in culturally appropriate and easily accessible manner, in accordance with Chapter 1.2;

  e.   It assigns implementation of measures to responsible staff with adequate skills and expertise;

  f.   It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping[13];

  g.   It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for affected rights-holders and stakeholders;

  h.   It maintains estimates of human resources and budget required; and

  i.   It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan.

2.4.3.2   In accordance with Chapter 1.2, the plan is informed by a participatory planning process with affected communities, that:

  a.   Facilitates participation by a broad spectrum of the communities, including different genders, ages, and ethnicities;

  b.   Include specific measures to facilitate the participation any potentially underserved and/or marginalized people[14];

  c.   Adheres to principles of **good governance**, through: 1) An agreed set of procedures to guide the process; and 2) An agreed set of criteria for how initiatives and beneficiaries will be selected;

  d.   Adheres to the principle of **transparency**, through ensuring that: 1) Information on the planning process and procedures are widely accessible and understood within the community; and 2) The planning process and any outcomes, decisions, and/or agreements are documented and made publicly accessible in languages and formats that are understandable to affected communities; and

  e.   If assistance by independent experts chosen by affected communities[15] is not provided by the appropriate public authorities, the ENTITY offers to cover, in full or in part, costs related to such external assistance, and a mutually-acceptable agreement for covering costs is developed.

E2 E3 D M P

2.4.3.3 To maximize procurement opportunities for local community members, a **local procurement management plan** (or equivalent) is developed by competent professionals, in collaboration with affected communities, as follows:

a. The plan includes quantitative targets and/or goals for sourcing from, and supporting, local suppliers and businesses (including gender-disaggregated indicators and other categories of disaggregated indicators where appropriate)[16];

b. It outlines processes for the transparent selection of local suppliers and the management of corruption risks in the selection process (see Chapter 1.7);

c. It is proactively shared with local suppliers, business-owners and entrepreneurs, along with the suppliers' Code of Conduct required in 1.4.2;[17]

d. It assigns implementation of measures to responsible staff with adequate skills and expertise;

e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping[18];

f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for local suppliers and businesses;

g. It maintains estimates of human resources and budget required; and

h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan.

E2 E3 D M P

2.4.3.4 To maximize employment opportunities for local community members, a **local employment management plan** (or equivalent) is developed by competent professionals, in collaboration with affected communities, as follows:

a. Outlines specific measures to address barriers to, and maximize enablers and opportunities to, employment of local community members, including as consultants or contractors;

b. Outlines specific measures to support skills development and career advancement of employees coming from local communities;

c. Includes appropriate time-bound performance indicators (including gender-disaggregated indicators and other categories of disaggregated indicators where appropriate)[19] to enable evaluation of the effectiveness of the local employment measures taken;

d. It assigns implementation of measures to responsible staff with adequate skills and expertise;

e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping[20];

f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected communities;

g. It maintains estimates of human resources and budget required; and

h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan.

2.4.4   Monitoring and Evaluation

E2 E3 D M P

2.4.4.1   To monitor and evaluate the implementation and effectiveness of the **community benefit plan**, the ENTITY:

a.   Collaborates with affected communities to, at least annually, track and document the ENTITY's performance on improving, or at least maintaining, the social and economic wellbeing[21] of communities affected by its activities, over successive time periods, against the expected outcomes defined in 2.4.3.1, and the performance indicators developed and updated as per 2.4.2.1;

b.   Encourages and facilitates joint monitoring and joint tracking with affected communities, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2[22]; and

c.   Includes continuous feedback from internal and external sources to inform these monitoring and evaluation activities.

E2 E3 D M P

2.4.4.2   To monitor and evaluate the implementation and effectiveness of the **local procurement and employment management plans**, the ENTITY:

a.   Tracks and documents its performance on maximizing **procurement** opportunities for local community members, over successive time periods, against the local procurement targets and goals required in 2.4.3.3.a;

b.   Tracks and documents its performance on maximizing **employment** opportunities for local community members, over successive time periods, against the local employment performance indicators required in 2.4.3.4.c;

c.   Includes continuous feedback from internal and external sources to inform these monitoring and evaluation activities;

d.   Monitors its local suppliers for compliance with the human rights, social, labor, and environmental rules and principles defined in its Code of Conduct required in 1.4.2.

2.4.5   Continuous Improvement

E2 E3 D M P

2.4.5.1   At least annually, but without undue delay after a significant change, the ENTITY:

a.   Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 2.4.4;

b.   Reviews any grievances related to community support, community benefit, and local content, and the functioning of the relevant grievance mechanism/s (see also Section 1.6.4);

c.   Reviews is effectiveness in improving, or at least maintaining, the social and economic wellbeing[23] of communities affected by its activities as per 2.4.3, informed by the monitoring and evaluation required in 2.4.4.1;

d.   Reviews is effectiveness in maximizing local **procurement** and local **employment** opportunities as per 2.4.3, informed by the monitoring and evaluation required in 2.4.4.2;

e.   Develops and implements time-bound corrective measures to update, if necessary[24], its methodology to gauge the level, and diversity, of support for, and opposition to, the project/operation amongst affected communities in accordance with Section 2.4.2;

f.   Develops and implements time-bound corrective measures to update, if necessary[25], its community benefit plan in accordance with Section 2.4.3;

g.   Develops and implements time-bound corrective measures to update, if necessary[26], its local procurement and employment management plans in accordance with Section 2.4.3; and

h.   Develops and implements time-bound corrective measures to update, if necessary[27], its monitoring and evaluation process in accordance with Section 2.4.4.

2.4.6   Information-Sharing and Public Reporting

E2 E3 D M P

2.4.6.1   At the same frequency as in 2.4.2.2, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:

a.   The methodology used to gauge community support, required in 2.4.2;

b.   A summary of the data collected through, and the results of, all the protocols and/or processes implemented to gauge community support; and

c.   A summary of the measures taken to strengthen community support, and the extent to which they are being effective.

E2 E3 D M P

2.4.6.2   At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:

a.   A summary of its **local procurement** management plan, as required per 2.4.3.3;

b.   A summary of its **local employment** management plan, as required per 2.4.3.4; and

c.   A summary of the results of the local supplier compliance monitoring process required in 2.4.4.2.d, and the corrective measures taken in response (see 2.4.5.1);

E2 E3 D M P

2.4.6.3 At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:

a. The number of people from local communities who work as employees, disaggregated by gender, for the reporting period;

b. The number of people from local communities who work for its contractors, disaggregated by gender, for the reporting period; and

c. The number of people from local communities working as employees and for its contractors who have been promoted to more senior positions over the reporting period.

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2.4.6.4 **IRMA+**
The ENTITY also disaggregates the data required in 2.4.6.3 by:

a. Age group/range;

b. Disability[28];

c. Indigenous status, if relevant; and

d. Any potentially underserved and/or marginalized people.

CROSS REFERENCES TO OTHER CHAPTERS

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

CHAPTER ENDNOTES

[1] For example, ICMM members recognize that: "Successful mining and metals projects require the support of a range of interested and affected parties. This includes both the formal legal and regulatory approvals granted by governments and the broad support of a company's host communities." (ICMM. 2013. Indigenous Peoples and Mining. Position Statement. https://www.icmm.com/en-gb/members/member-commitments/position-statements/indigenous-peoples-and-mining-position-statement)

[2] **Economic wellbeing** can refer to material living conditions which determine people's consumption possibilities and command over resources (OECD Better Life Initiative 2011), whereas **social wellbeing** can refer to the degree to which individuals are functioning well in their social lives (perception of integration into society, acceptance of other people, coherence of society and social events, sense of contribution to society, potential and growth of society (Keyes, C. L. M. (1998). Social well-being. Social Psychology Quarterly, 61, 121-140.) Beyond offering these definitions, it is not feasible for IRMA to determine a checklist of 'wellbeing' indicators that entities need to commit to, because what constitutes wellbeing in each context will vary. IRMA's approach, rather, is to incorporate throughout the various chapters ample guidance for entities concerning determining, in conjunction with affected stakeholders, the needs and interests of those stakeholder themselves (many of which contribute to their economic and social well-being), and seeking to achieve those co-established goals.

[3] This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

[4] This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

[5] The requirements in 2.3.2 apply to non-Indigenous communities. If an affected community is an Indigenous Peoples' community, the ENTITY is required to respect all fundamental rights of Indigenous Peoples, including their right to free, prior and informed consent (FPIC) (as per Chapter 2.2).

[6] Other disaggregation may be by age, ethnicity, disability, vulnerability status, proximity to the operation, etc.

[7] IRMA recognizes that, ideally, this should be taking place on an ongoing basis. But the Standard is proposing flexibility in how entities choose to meet this requirement - depending on the relationship with the communities, agreements with communities as to how engagement should occur, presence of traditional structures influencing engagement processes, preferences of the communities, existing methodologies to gauge community support, and what is logistically feasible in the specific context, entities may choose to take a 'snapshot' of community support every three years, or they may choose to continually update such an understanding and simply commit to publishing findings at least every two years.

[8] As informed by 2.4.2.2.d. This plan will be reviewed and continuously improved, as necessary, as per Section 2.4.5.

[9] If work is carried out by third party contractors, then there needs to be a staff employee responsible for overseeing the quality of work, timelines, etc.

[10] E.g. These provisions could be integrated into (and evidenced through) a community benefit agreement (or agreements), if affected communities request, or are willing to, formally approve agreements.

[11] E.g. historically- or traditionally-underserved and/or marginalized people.

[12] Community health and safety is addressed in dedicated Chapter 3.3.

[13] If work is carried out by third party contractors, then there needs to be a staff employee responsible for overseeing the quality of work, timelines, etc.

[14] Note that the purpose of including a broad range of stakeholders is to ensure that benefits to communities are not confined to a few, but rather are shared throughout the community. This approach should also aid in reducing potential conflicts within communities that could arise if some groups or individuals are viewed as gaining benefits while others do not.

Which stakeholders must be included and what may constitute 'underserved and/or marginalized people' requiring additional focus depends on the context. 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 in planning processes 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 will be provided in the IRMA Guidance Document.

[15] E.g., as facilitators and/or community advisors of their own choosing, to support them in, for example: understanding, negotiating, navigating, monitoring and evaluating, measures/initiatives/opportunities led or co-led by the Entity to improve the social and economic wellbeing of affected people.

[16] Other disaggregation may be by age, ethnicity, disability, vulnerability status, proximity to the operation, etc.

[17] See MSV LPRM standard for additional details pertaining to best practice for local procurement.

[18] If work is carried out by third party contractors, then there needs to be a staff employee responsible for overseeing the quality of work, timelines, etc.

[19] Other disaggregation may be by age, ethnicity, disability, vulnerability status, proximity to the operation, etc.

[20] If work is carried out by third party contractors, then there needs to be a staff employee responsible for overseeing the quality of work, timelines, etc.

[21] Community health and safety is addressed in dedicated Chapter 3.3.

[22] 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.

[23] Community health and safety is addressed in dedicated Chapter 3.3.

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

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

[26] This will be informed by the monitoring and evaluation process required in the previous Section –including the monitoring of any non-compliance of local suppliers with the ENTITY's Code of Conduct (see 2.4.4.2.d)–, and on the review process required in a. to d.

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

[28] See all GRI - Disability reporting in sustainability reporting (2021) https://www.globalreporting.org/media/0zmnlesh/dhub_disability_reporting_guide.pdf

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