



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 3.5 – Artisanal and Small-Scale Mining (ASM)**

**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 3.5

# Artisanal and Small-Scale Mining (ASM)

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

- Moved Section on **Commercial relationships with ASM** to Chapter 1.4–Upstream and Downstream Sustainability Due Diligence. This is more consistent and ensures Chapter 3.5 can be marked non-applicable entirely when no ASM activities occur in the project/operation's area of influence (even though the ENTITY may be sourcing minerals from ASM that takes place elsewhere).
- Removed the requirement related to conflict-affected and high-risk areas, as this is redundant. Commercial relationships with ASM are now integrated into Chapter 1.4 that has a clear and dedicated linkage with Chapter 1.5 on CAHRAs (including requirements and clauses to assess/ascertain applicability of the CAHRA Chapter).
- Added on optional IRMA+ requirement to extend support and knowledge-transfer activities with ASM operations.
- Added two requirements to close the Plan-Do-Check-Act continuous improvement loop, and add consistency with the rest of the Standard (Section 3.5.4 and 3.5.5).
- Substantial structural changes to increase clarity and consistency with the rest of the Standard.

### RESPONSE TO CONSULTATION QUESTIONS OUTLINED IN FIRST DRAFT

No consultation question for this chapter

### BACKGROUND

In 2013, it was estimated that there were between 20 and 30 million men, women and children involved in artisanal and small-scale mining (ASM) worldwide, and that the ASM sector was responsible for 15 to 20 percent of the production of global minerals and metals.<sup>1</sup> As of 2024, those engaged directly and indirectly in the ASM's labor value chain make up more than 225 million people working across Latin and South America, Africa, and Asia. Studies estimate that women account for between 18 percent and 50 percent of the 45 million people who work directly in ASM.<sup>2</sup>

While there is no single definition of ASM, it is generally understood to encompass a range of activities, including prospecting, exploration, extraction, processing and transportation, of minerals, that use more simplified and labor-intensive technologies and practices than industrial or large-scale mining (LSM).

The ASM sector is complex and diverse. It includes individuals or families mining to earn or supplement their livings, as well as small-scale commercial operations that employ numerous workers. Much of ASM is informal, including entities operating in contravention to laws, or in the absence of an appropriate legal framework, although some ASM operators do have permits, pay taxes and abide by social and environmental regulations.<sup>3</sup> In some contexts, there may be a criminal element to ASM activities, such as smuggling, tax evasion, money laundering, trafficking in illegal chemicals, or financing of conflict.<sup>4</sup>

ASM sometimes occurs in areas close to, or on, LSM concessions. ASM miners may have traditionally operated in those areas, full-time or seasonally, or in other cases miners may have arrived during LSM exploration or after the development of the large-scale mine and any associated mineral processing facilities.

Given the diversity within the ASM sector, it is understandable that interactions between LSM and ASM entities can also take on a variety of forms. To maximize the opportunities for harmonious co-existence, and prevent the risk of conflict of violent confrontation,<sup>5</sup> companies can foster positive relationships with ASM entities and individuals, and support the development of ASM that provides positive livelihood opportunities and is protective of human rights, health, safety, and the environment.

ASM is playing a growing role in global supply chains (ranging from well-known minerals and metals such as gold, cobalt, copper, and semiprecious and precious gemstones to lesser-known materials such as salt, gravel, and quarry rock) and many national economies,<sup>6</sup> and holds the potential to provide decent livelihoods if conducted in an organized and responsible manner, and if afforded more secure access to capital and markets. Large-scale mines that operate in the same regions as ASM, or that purchase minerals produced by ASM, have the opportunity to contribute to positive transformations in the ASM sector.

### KEY REFERENCES

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

- OECD, Due Diligence Guidance for Responsible Business Conduct
- World Bank, EGPS, Achieving Sustainable and Inclusive Artisanal and Small-Scale Mining (ASM), 2024

OBJECTIVE OF THIS CHAPTER

To avoid conflict and, where possible within the scope of country of operation law, foster positive relationships between entities managing large-scale mining and mineral processing operations and artisanal and small-scale mining (ASM) entities, and support the development of ASM that provides positive livelihood opportunities and is protective of human rights, health, safety, and the environment.

SCOPE OF APPLICATION

This chapter is applicable to all exploration, mining and mineral processing projects and operations. However, when the stakeholders mapping process required in Chapter 1.2 demonstrates that no ASM activities is occurring in the project/operation’s area of influence (as per 1.2.1.1), this Chapter 3.5 will not be applicable.

Requirements related to the sourcing/purchase of minerals from ASM are included in Chapter 1.4 on Upstream and Downstream Sustainability Due Diligence.

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

### 3.5.1 Scoping

- 3.5.1.1** Building on 1.2.1.1, a scoping process (or equivalent) is undertaken and documented by competent professionals to understand the legal, social, and environmental context in which ASM activities are occurring in the site's area of influence.

### 3.5.2 Meaningful Engagement with ASM Entities and Communities

**3.5.2.1 Critical Requirement**

The ENTITY can demonstrate that a good faith effort is made to<sup>7</sup>:

- Engage with ASM entities and communities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (see Chapter 1.2);
- Consult with informal and formal ASM entities and communities during relevant risk and impact assessments and closure planning (see Chapters 2.1 and 2.7, as well as relevant social and environmental Chapters);
- Engage with communities that are or may be affected by ASM activities or by interactions between the ENTITY and ASM activities; and
- Proactively inform ASM entities and communities that there is an operational-level grievance mechanism available to raise their concerns and resolve conflicts related to the site and its associated facilities (see Chapter 1.6).

### 3.5.3 Foster Positive Relationships and Opportunities

- 3.5.3.1** Building on 3.5.1, to foster positive relationships and opportunities for ASM entities and communities, a management plan (or equivalent) is developed and documented by competent professionals. This plan:

- Includes regular training for the security personnel of the site and its associated facilities in respecting the human rights of individuals and communities engaged in ASM activities, and of members of communities affected by ASM activities or by the interactions between the ENTITY and ASM activities (see also Chapter 3.4);
- Includes specific support measures to improve the safety of ASM activities;
- Includes specific support measures to mitigate the adverse environmental and social impacts of ASM activities, and to maximize their positive impacts;
- Includes relevant performance indicators to evaluate the effectiveness of the ENTITY's engagement, training, and support measures; and
- Is developed in collaboration with ASM entities and communities to the extent possible.



### 3.5.3.2 IRMA+

The plan also includes the following specific support and knowledge transfer measures:

- a. Sharing of geological information;
- b. Skills and knowledge transfer on responsible closure and reclamation of mining areas (see Chapter 2.7); and
- c. Financial support to carry out independent assessment of the human rights, environmental, social, and governance performance of ASM activities; and
- d. Financial support to obtain third-party certification or assurance<sup>8</sup> on the human rights, environmental, social, and governance performance of ASM activities;

## 3.5.4 Monitoring and Evaluation



**3.5.4.1** To monitor and evaluate the implementation and effectiveness of its engagement, training, and support activities related to ASM entities and communities, at least annually, the ENTITY:

- a. Tracks and documents the implementation progress and effectiveness of its engagement activities with ASM entities and communities, over successive time periods, against the relevant performance indicators (see 3.5.3.1);
- b. Tracks and documents the implementation progress and effectiveness of its training and support activities related to ASM entities and communities, over successive time periods, against the relevant performance indicators (see 3.5.3.1); and
- c. Disaggregates the data according to gender-specific indicators, where appropriate.

## 3.5.5 Continuous Improvement



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

- a. Reviews the monitoring and evaluation results, and any ASM-related grievances (see Section 1.6.3);
- b. Reviews its effectiveness in supporting ASM entities and communities to improve the safety of ASM activities;
- c. Reviews its effectiveness in supporting ASM entities and communities to mitigate the adverse environmental and social impacts of ASM activities, and to maximize their positive impacts;
- d. Develops and implements time-bound corrective measures to update, if necessary<sup>9</sup>, its engagement, training, and support activities related to ASM entities and communities, in accordance with Sections 3.5.2 and 3.5.3.

### CROSS REFERENCES TO OTHER CHAPTERS

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

### CHAPTER ENDNOTES

<sup>1</sup> Buxton, A. 2013. Responding to the Challenge of Artisanal and Small-Scale Mining: How can knowledge networks help? Institute for Environment and Development (IIED), London. p. 3. <http://pubs.iied.org/16532IIED/>

<sup>2</sup> Sources: World Bank. 2024. "Achieving Sustainable and Inclusive Artisanal and Small-Scale Mining (ASM): A Renewed Framework for World Bank Engagement". <https://openknowledge.worldbank.org/server/api/core/bitstreams/cab95ce4-781f-42df-9c4d-912c55834c1b/content> ; and

IISD (International Institute for Sustainable Development). 2017. "Annual General Meeting Background Paper: ASM Global Trends." Prepared by the International Institute for Environment and Development (IIED). Winnipeg: IISD. <https://www.igfmining.org/wp-content/uploads/2018/09/ASM-ReportIGF-2017-AGM-Program.pdf>

<sup>3</sup> *ibid.* p. 4; Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF). 2017. IGF Guidance for Governments: Managing Artisanal and Small-Scale Mining. International Institute for Sustainable Development (IISD).p. 5. <https://www.igfmining.org/resource/guidance-for-governments-managing-artisanal-and-small-scale-mining/>

<sup>4</sup> IGF, 2017, p. 12; and Echavarria, C. 2014. 'What is legal?' Formalising Artisanal and Small-Scale Mining in Colombia. Institute for Environment and Development (IIED), London and Alliance for Responsible Mining (ARM), Columbia. P. 23. <http://pubs.iied.org/pdfs/16565IIED.pdf>

<sup>5</sup> Communities and Small-Scale Mining, World Bank/IFC Oil, Gas and Mining Sustainable Community Development Fund and ICMM. 2010. Working Together - How Large-Scale Mining Can Engage with Artisanal and Small-Scale Miners. p. 5. <https://www.commddev.org/publications/working-together-how-large-scale-mining-can-engage-with-artisanal-and-small-scale-miners/>

<sup>6</sup> Freudenberger, M., Ali, S., Fella, T. and Pennes, S. 2013. Property Rights and Artisanal Mining: Clarifying and Strengthening Rights: Options for Policymakers. USAID Issue Brief. p. 1. <https://www.land-links.org/wp-content/uploads/2016/09/Property-Rights-and-Artisanal-Mining.pdf>

<sup>7</sup> Recognizing that some outreach may be difficult in some situations that pose a material risk to the ENTITY's personnel.

<sup>8</sup> This can include certification against the CRAFT Code, and the ARM Fairmined Standard, where applicable.

<sup>9</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.

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